

Draft National Urban Policy submission

4 July 2024

Curiosity Co welcomes the Australian Government's championing of a National Urban Policy and the opportunity to attend the community workshop in Melbourne on 24 June 2024 and submit comments on the draft policy document.

The return of the Australian Government to this space rightly elevates the urban condition of our cities to one of national significance. Indeed, the shape, state and future of Australian cities requires ever greater levels of coordination to ensure that they meet the challenges of growth, global competitiveness, climate change and resource scarcity while trying to embody a uniquely Australian response to being urban.

Whilst supportive of the intent draft National Urban Policy, Curiosity Co proposes that the document:

- must be bolder and describe a compelling national urban narrative
- establishes a strategic context for the future of our cities
- structurally differentiates between the needs of cities, regions, towns and suburbs
- outlines the leadership role of the Australian Government
- defines the expectations of the Commonwealth, States and local government in the realisation of the policy
- sets clear expectations for the goals and objectives
- outlines how cities can and should change to accommodate growth, increase productivity and enhance liveability
- describes an urban form
- emphasises design, place and biodiversity as solutions to urban challenges.
- uses clear unequivocal language and defines the terms it uses
- includes an implementation plan.

It is time for the Australian Government to say we will grow up and within our existing cities, rather than to endlessly sprawl outwards.

VISION

The decision to not include a vision statement is understandable given the complexity of negotiating agreement with State governments and across agencies, however, it is also true that the draft policy is written from a set of assumptions that are reflected in the document but not made explicitly clear. This does create ambiguity in the policy about what Government expectations.

The vision needs to be aspirational and not simply a consensus position of the States. It needs to be clear what the Australian Government expects our cities to become and an Australian urbanism to be.



STRATEGIC NARRATIVE

In support of the vision, the draft National Urban Policy needs a compelling national urban and spatial narrative to describe what an Australian urbanism looks like or could be and how our cities need to respond to changing geopolitical, growth and economic realities.

The draft policy fails to mention any Australian city by name – towns seem to have disappeared entirely - and you must do some sleuth work to find the list of the top 20 cities that it refers to (these could be included in appendices for ease of reference). Of these 20 cities, there is no framework that captures the different development patterns, growth aspirations, infrastructure requirements and regional roles that our cities play now and into the future.

The lack of this in the draft policy, its language and the way key challenges are described, makes it seem that the top 20 cities are all somehow treated equally. This is particularly apparent in the key challenges which have no weighting or prioritisation and treat multimodal freight the same as inclusivity in public spaces for example. This equanimity may be fine across some lifestyle measures but fails to recognise the different spatial, economic and productivity capabilities of our urban areas, nor does it provide a rationale for governments' investment prioritisation.

A National Urban Policy is an appropriate place to address the issue of the hierarchy of Australian cities, and we recommend the Government consider strengthening this aspect of the document. We note and support the suggestion of Better Streets that the draft policy refer to Infrastructure Australia's 2021 Australian Infrastructure Plan and its categorisation of Australian cities.

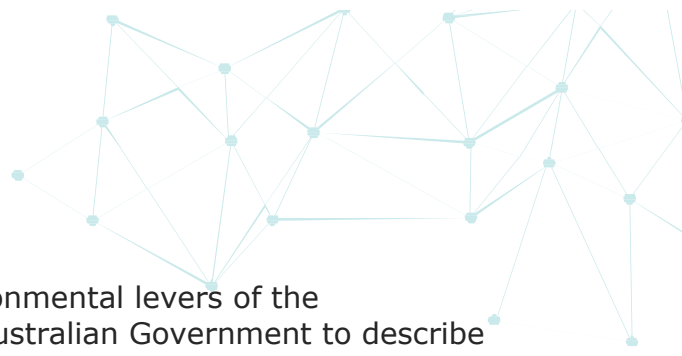
The refreshed State of Australian Cities reports should be integral to the National Urban Policy. They can provide the currently lacking background, geopolitical and strategic context for the policy as well as an evaluative framework to describe the differing relationships and needs of our cities to one another.

Strengthening the State of Australian Cities Reports and linking them more explicitly to the National Urban Policy would allow the policy to better articulate a national vision for coordinating their future growth and liveability.

LEADERSHIP AND THE ROLE OF AUSTRALIAN GOVERNMENTS

As the national government, the Australian Government has a clear responsibility to frame a national urban position for our cities so that they respond to the challenges our nation faces.

Counter to the view that the Commonwealth's constitutional role limits its agency in this space, the Australian Government is not mired in the complexities of the differing state planning and infrastructure systems, and the partisan competition between cities.



The foreign policy, taxation, budget and environmental levers of the Commonwealth, amongst others, allows the Australian Government to describe a national future for our cities ensuring coordination of economic activity and infrastructure delivery, as well as outlining clear performance expectations against key strategic, environmental and lifestyle indicators. The Commonwealth should use these levers and performance requirements to ensure coordination across state and local government planning, policy and infrastructure to achieve its national agenda.

This is an opportunity to be bold and assume a leadership position. Rework the language in the policy with this in mind and be clearer about the role of each level of government ie Federal – strategic; State – planning and delivery; Local – operational. And it is time for the Australian Government to say it will use its levers to support this change and transition.

GOALS, OBJECTIVES AND PRINCIPLES

The five key goals and their definitions are sound, though arguably if our urban areas are not 'sustainable' then the other goals are moot. They reflect the lack of a described vision and strategic narrative in the policy. Similarly, the explanatory series of determining factors lack a clear government position. Without a clear strategic frame they are at best nice generalities. And nowhere does it offer how each goal will be achieved, what constitutes a good outcome or what would be a poor one.

Similarly, with the objectives there is nowhere that tells us how they will be achieved. The lengthy discussion pieces provide interesting context but only lead to a set of "possible outcomes" rather than more definitive actions. Consequently, it's unclear how the policy and proposed actions are given weight across government jurisdictions.

And using the language of 'focus areas' along with the objectives is confusing. Objectives have outcomes, focus areas are a less clear area of study. Hopefully post consultation these tighten into more definite actions. Interestingly, the principles developed by the Urban Forum have a clear coherence and detail, and are the strongest element in the policy document. They are the only part of the document that begins to articulate an urban form and character for our cities, something we think is essential to an Urban Policy. Their more precise language is at odds with the more government language of the rest of the policy. It is also unclear what real role they have when they sit in the appendices. If they are part of the policy's decision making 'principles' as touted, then this needs to be more clearly articulated.

Lastly the document doesn't define some key terms, like what the Australian Government means by 'urban,' 'urban place,' or 'urban areas.' A glossary could be easily included in the appendices to assist this. As a result, the document seems to mix up what are urban issues with sustainability and social issues that are best dealt with in their own relevant policy.



Set a clearer aspiration for each of the goals, with objectives supported by clearer actions. Define key terms and be careful of passive government language.

*The Canadian Task Force for Housing & Climate website and report does this very clearly for each level of government.
<https://housingandclimate.ca/blueprint/>*

IMPLEMENTATION

Critical to a document of this nature is an implementation plan. Without it, it is unclear what government will do and by when, and how it will track its progress (and others) against the delivery of each goal. The list of current federal programs attached to the draft policy does not constitute an implementation plan given that these are programs already underway and whose framing is unaffected by this policy.

Include an implementation plan that is linked to the goals and objectives of the policy and has clear timelines and reporting expectations included. This could articulate expectations for other levels of government.

CONCLUSION

In the current environment of high growth, housing cost and supply issues, climate uncertainty and a less certain geopolitical environment, the draft National Urban Policy is an opportunity to achieve a transformation of our cities and nation. This draft policy is an important first step and we commend the government for its development. We encourage the government to meet the challenge with a bold agenda.