

To whom it may concern,

Thank you for the opportunity to provide feedback on the Draft National Urban Policy. Please see below for feedback and recommendations for the policy.

### Overarching comments and recommendations

1. The Draft National Urban Policy (NUP) is a positive step, but unambitious. The NUP is an opportunity to set a bold vision for the future of Australian towns and cities. Australian urban areas are currently experiencing housing shortages leading to high housing costs, increasing impacts from flooding and fire, and struggling traffic networks. A more ambitious NUP is an opportunity for a centralised, bold vision for how the country addresses these issues.
2. Crucial to achieving this, is a clear implementation mechanism. This is currently lacking in the draft NUP. Part 2 articulates the roles of each arm of the public and private sectors in facilitating urban development, but does not identify how the Australian Government will drive implementation of the policy.
3. This could be through explicitly tying state funding to benchmarks within the NUP, standardising national approaches to planning, or through establishing a working group / committee. It also doesn't identify how the NUP will be implemented across other Australian Government departments (e.g. treasury, health).
4. Vital to implementation are targets and indicators for the health of cities. While these will be included in the State of Cities reports, they are missing from the NUP. This makes it difficult to understand what the Australian Government would consider a "successful" implementation of the NUP. As a point of comparison, New Zealand's *Government Policy Statement on Housing and Urban Development (GPS-HUD)* identifies several indicators and benchmarks for each theme<sup>1</sup>.
5. There is an opportunity for the NUP metrics to be associated with other national evaluation frameworks; such as the Australian Treasury's *Measuring What Matters* framework. This may also be achieved by consolidating indicators or outcomes from the related strategies in initiatives outlined in Appendix B of the draft NUP.
6. The NUP also doesn't adequately identify the governance issues involved in managing Australian urban places. Metropolitan areas have highly fragmented governance, particularly in Sydney and Melbourne. As the footprints and socio-econo-environmental catchments of cities become larger, there is an opportunity for the NUP to facilitate new forms of managing urban places intended to overcome barriers to achieving housing goals and infrastructure provision.
7. First Nations groups need to be part of the governance solution to Australian urban places. The perspectives of First Nations peoples is missing from the governance of our towns and cities. These perspectives should be amplified and more thoughtfully integrated through the Policy.

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<sup>1</sup> See Appendix 3:

[https://www.hud.govt.nz/assets/Uploads/Documents/HUD-GPS\\_Cabinet-Paper-CMYK-5\\_3b2-web-3.pdf](https://www.hud.govt.nz/assets/Uploads/Documents/HUD-GPS_Cabinet-Paper-CMYK-5_3b2-web-3.pdf)

8. The NUP needs to support States and LGAs to more effectively engage with communities and make more ambitious plans. The NUP is a license for authorities and regulators to try new ways of Planning and engaging with communities. Authorities are often challenged by limited resources and communities with limited understanding of urban challenges. The Australian Government could and should do more to support authorities and communities to navigate urban change by providing resources, access to information, and funding for innovative techniques.
9. Ultimately, this NUP does not adequately recognise the scale of change that is required if Australia is to reach its climate, reconciliation, health and educational goals. There will need to be significant changes in the way Australians live and the way Australian towns and cities are managed - this document is an opportunity to begin these conversations.

### Australian government goals

1. The goals are relatively baseline and do not reflect an ambitious target for what Australian cities should “be”. While these are good minimums, we should be aiming for more than ‘liveable’.
2. Two additional goals should be added:
  - a. Indigenous: acknowledging that Australian cities were built on stolen land, and that part of national reconciliation involves re-indigenising urban places.
  - b. Affordable: recognising that equity and affordability are different concepts - refer to London as a city which has social equity but is not affordable versus Detroit as a city which is affordable but not equitable.
3. Sustainable should be renamed to Regenerative. This acknowledges that there are extremely damaged parts of our towns and cities that need repair and restoration of the habitat. We need to move beyond ‘sustainability’ as there are some areas that we should not sustain in their current form.

### Feedback on objectives

#### **Objective 1: No one and no place left behind**

1. This Objective needs to more directly promote the building of more houses. While the housing shortage is recognised as a key urban challenge, requiring authorities to build and enable more houses is not listed as an action.
2. Directives could be given to State or Local governments to upzone significant areas of their cities. This would set a new precedent in Australia, but the scale of the crisis requires this intervention. Upzoning leads to more construction, leading to more housing, leading to lower prices through filtering. There is evidence from Auckland, New Zealand that the Unitary Plan significantly moderated housing cost growth in the late 2010s-early 2020s<sup>2</sup>.

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<sup>2</sup> See Greenaway-Mcgrevy, 2023 [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4560296](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4560296)

3. The Australian Government could also do more to facilitate public housing construction, following a similar model used by Kāinga Ora in New Zealand. Combining public housing and land development functions, Kāinga Ora has added around 20,000 public, transitional, and market affordable homes since 2017, as well as innovative building techniques. This model shows that a unified organisation given powers to procure and rezone land can have immediate positive effects
4. Objective One identifies the need to build more homes in 'well-located' areas, which is positive. It should also identify the need to make more areas 'well-located.' Many Australian suburbs are not well-located, due to poor infrastructure and historical planning mistakes. Part of making Australian cities more Productive, Equitable, Resilient, Liveable, Sustainable (and Affordable and Indigenous) is the need to retrofit suburbs which are currently experiencing poor outcomes. This can be done through transit policy, housing policy, urban design initiatives, and infrastructure policy.

### **Objective 2: All people are welcome**

1. This objective should do more to recognise the role of land-use policies in creating thriving night-time economies. Ensuring that people live nearby to night time economic areas, and that these areas are not severed by hostile infrastructure is key to ensuring that people will spend time and money in night time hotspots.
2. There are no actions relating to migrant communities in this objective. Our cities are highly cosmopolitan, and part of our urban future will be to ensure that the diverse cultures in this country are reflected in urban places.
3. This objective needs to address safety and dignity in public spaces. Over-surveillance and privatisation of urban spaces reduces the amount of people who feel welcome in certain spaces, and reduces opportunities for cultural sharing. The management of space to ensure that it is not exclusionary is important to this objective.

### **Objective 3: Our cities are safe**

1. Related to road safety, there needs to be actions relating to reducing speed limits and limiting passenger vehicle size / weight.

### **Objective 5: Our urban environments and communities promote health and wellbeing**

1. Heat resilience actions require shade and water as well as 'cool paints'. Highlight the importance of street trees and hard shade.
2. Initiatives are needed to support building design to suit tropical and desert environments, especially denser housing typologies. Currently our design is informed largely by European or American climates which are not always suitable for Australian climates.

3. Removal of polluting industries and infrastructure needs to be seriously considered as an initiative. The impacts of living near, for example, urban highways are found in lower health and educational outcomes, linked to noise, light, and air pollution<sup>3</sup>.
4. This objective should more directly refer to Wellbeing domains, and does not clearly identify the importance of cultural and economic wellbeing to people's overall health. The domains of wellbeing are all interconnected, urban places which are specifically designed to ensure wellbeing across several domains are likely to be more 'liveable'.
  - a. This is an opportunity to directly refer to the *Measuring What Matters* framework.

### **Objective 6: Our urban areas promote productivity**

1. The actions related to this objective could do more to support States and LGAs to combat traffic congestion. Recognising that traffic congestion is a huge inhibition to productivity, the NUP should more directly call-out measures such as congestion charging as measures to resolve this, and indicate support for states or LGAs which aim to implement such measures.
2. It should also note the concept of induced demand, that road building has diminishing returns, and that moving this demand to public transport or active transport is more likely to be successful.
3. Agglomeration is not mentioned in this Objective. Compact cities with agglomeration economies are more productive. The NUP should encourage urban areas to pursue a compact urban form which can more adequately support agglomeration of industries who can share, learn, and work together closely.

Thank you for the opportunity to share feedback on this exciting document. I attended the NUP Community Workshop in Brisbane on 2 July. In the room there were many passionate people who had great ideas and visions for the future of Australia's urban places. Continuing to work with and engage with people who are passionate about bringing positive change, and showing that the Australian Government is serious about solving our urban challenges will be crucial to the success of the NUP.

Yours faithfully,  
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