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The Department of Infrastructure, Transport, Regional
Development, Communications and the Arts

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RE: Individual Submission on the Draft National Urban Policy

Dear National Urban Policy Team

Thank you for the opportunity to make a submission on the draft National Urban Policy. Australian cities face several common challenges and I commend the Australian Government for this initiative. I have a professional and research background in digital technology, data analytics and urban planning and will focus my comments on these areas of the document.

1) More holistic consideration of digital technology

Digital technology does not belong to a singular policy topic, but rather underlies all the Australian Government Goals and Australian Government Objectives outlined in the document. Whilst I support the inclusion of references to improving data and analytical capabilities in “No-one and no place left behind” and “Our urban areas promote productivity” I recommend further consideration of how investment in digital capabilities may assist in achieving each goal.

For example, as relevant to “Our areas are sustainable” goal, the supply of sustainable building materials is one example where investment in better data and modelling is needed. With the assistance of a collaborative grant from the John Monash Foundation, I recently undertook a small research project with Dr Joe Gattas from the University of Queensland to determine whether Australia’s timber supply was sufficient to meet our future housing needs (see <https://timbertracker.uqcloud.net/>). Timber is one of the only readily available carbon-negative building materials, but trees take a long time to grow, and denser forms of urban development need more timber to support greater structural loads. Our modelling based on the Queensland dwelling projections shows that the demand for timber is likely to outstrip supply. Despite this being critical information to meet our carbon-reduction responsibilities by 2050, we found that not all states and territories publish dwelling projections, and few published projections that further defined the density of development type.

2) Need for deeper and more strategic investment in civic data infrastructures for planning

I applaud the document's recognition of the need to improve data collection capabilities, and the role of the Australian Government in improving information and data about Australian cities. I nevertheless recommend that this role should extend beyond the production of the "State of the Cities" report to facilitating more fundamental reform of planning data and analytics infrastructure. Whilst great strides have been made by planning authorities across Australia to making zoning data publicly available, most professionals and academics involved in planning, yet alone the public, lack access to fundamental information including (but not limited to):

- Development approvals and completions data
- Fine-grained land use data
- LGA-specific population and dwelling projections

Despite its relevance across many facets of business, government and civil society, answering simple questions such as of "how much [housing/retail floorspace/parkland] do we have?" is still difficult. To realise the full benefits across the hundreds and thousands of organisations and individuals involved in planning Australia data to answer these fundamental questions should be provided as a public resource or platform. Federal and state governments are best placed to invest in building these underlying data capabilities. Additionally, Australian government organisations could also explore where regulatory intervention is required to ensure public value in urban data collection as seen in some international cities like Barcelona¹. Examples include requiring aggregated and anonymised data from relevant proprietary platforms as a condition of operation (e.g. micromobility providers, Uber, Airbnb) and where data is collected in public spaces and/or extracted from citizens (e.g. mobile phone tracking).

3) Planning Institute of Australia's PlanTech Principles

References to digital technology and data capabilities should be aligned with the Planning Institute of Australia's PlanTech Principles, and reference them accordingly

(<https://www.planning.org.au/planningresourcesnew/plantech-pages/pia-plantech-principles>).

4) Digitalisation of planning systems – need for a roadmap

Whilst not relevant to a specific topic area, digitalisation of the various planning systems across Australia's States and Territories should be addressed by the National Urban Policy or associated initiatives. Many common challenges are faced relevant to the policy' goals and principles, including:

- How to implement AI into development approvals processes to improve efficiency whilst ensuring the integrity and transparency of regulatory systems is maintained, and good planning outcomes are achieved.
- Ensuring digitalisation produces data that is fit for purpose. This includes monitoring the effectiveness of planning policies in the achievement of social and environmental outcomes.

¹ See example "[Reclaiming data for improved city governance: Barcelona's New Data Deal](#)" by Fernandez-Monge et al. (2023)

- Ensuring any use of AI in consultation builds rather than damages trust between government and communities.
- Ensuring planners have access to, and are trained in, using digital tools and resources they need to do their best work.

Whilst each state has a different planning system and will require freedom to develop their own approach, these common challenges indicate that there is significant value to be gained in dedicating resources to national information sharing forums, guidelines and standards. Early work by the Planning Institute of Australia includes [AI in Development Assessment Guidance Note](#) and the [PlanTech Best Practice Guidelines](#).

Data Sovereignty and Measures to Protect Other Minority or Vulnerable Populations

I support the recognition of indigenous cultural and intellectual property in section “All people belong and are welcome”. In relation to data and digital technology, related concepts of data sovereignty are also explored and recognised.

In addition, it is important to recognise and take steps to mitigate the harms that can occur relating to information asymmetries between powerful organisations and vulnerable groups. Rental platforms are a particularly egregious example relevant to the goals of the National Urban Policy. Here we see large amounts of personal data extracted from anyone seeking a rental property, exacerbating imbalances in the relationship between renters and landlords, with the effect of increasing housing precarity². Additionally, accumulation of real estate information more generally by proprietary technology platforms may have harmful effects on property markets³. Government open data is not immune to this problem. With few individuals having access to the time and skills required to undertake complex data analysis, active investment must be made in providing relevant information in accessible formats to reduce potential harms to communities when it comes to property and rental markets.

Thank you again for providing this opportunity to comment. I am happy to be contacted to provide additional information on any of the above.

Warm Regards,

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² For an illustration of this issue see University of Sydney’s “Know Your Landlord” Initiative:
<https://knowyourlandlord.app/>

³ See recent comments by the NSW Productivity Commission regarding PEXA’s monopoly on eConveyancing
<https://www.afr.com/companies/financial-services/nsw-productivity-agency-says-pexa-s-dominance-must-end-20240630-p5jpu5>