

SUBJECT:
DATE:21 July 2024
ATTENTION:

Dear Sir/Madam

Submission on Draft National Urban Policy

Thank you for the opportunity to comment on the Draft National Urban Policy.

Support for infrastructure and data are welcome

Council welcomes the commitment to from the Commonwealth coordinate urban policy at a national level. We also welcome investment in infrastructure and urban spaces. Publishing a regular “State of the Cities” report is also pleasing as better data can help improve planning. It would be good if there was an opportunity to comment on what data will be published. We urge you to publish data that will help decision makers improve their planning policies and planning systems to implement meaningful change.

Support for the six objectives

We support the six objectives proposed by the policy. They are worthwhile and reflect the sort of cities and towns we all want to live in. It is how they will be implemented that we would like to be made clearer.

Concern about lack of firm commitments/implementation plan

Our principal concern with the policy is that it lacks any specific commitments or any kind of implementation plan. While the State of the Cities report will be published “regularly”, we would like to see a mechanism, either in that report, or elsewhere, that reports on the progress of actions associated with each objective. The inclusion of targets with measurable outcomes help everyone understand if the nation’s urban areas are improving (or not) during the life of the policy. Such knowledge will help the many players involved in urban policy see whether their policies, plans and strategies are making a difference or whether other initiatives and interventions are needed.

The policy needs firmer funding commitments for specific projects that are tied to the objectives. Funding commitments should also be responsive to the State of the Cities report.

Ongoing consultation with local government needed

We note that there has been consultation with other levels of government through the Planning Ministers' Meeting, Heads of Planning and an urban interjurisdictional working group. There has also been consultation with the Australian Local Government Association and capital city Lord Mayors. As strong advocates of public engagement, we would like the policy to commit to ongoing engagement with local government.

Role of the Commonwealth in urban policy needs to be clearer

It is difficult to distinguish large parts of this document from various state and local planning policies. State and local governments are responsible for setting planning policy and controls as well as managing the planning system. The objectives of this policy support planning policies at state and local level, but the Commonwealth plays a different role in urban policy and this document doesn't explain that well enough. The policy says the Commonwealth has a role to play in partnerships, better coordination, and publishing data.

While Council does not disagree with that, you also have responsibilities for such things as immigration policy, tax policy, as well as the ability to fund transformative infrastructure and affordable housing. The policy touches on these matters, but these levers have the ability to make a genuine difference to urban areas. This policy is disappointingly unclear about how exactly you will use them to meet your objectives. The policy needs a greater emphasis on what distinguishes your role from that of state and local government.

Moreover, there is a need for this policy to provide greater clarity around the proposed reforms at both a federal and state level. In Victoria, state government reforms are currently underway that will deliver significant changes to planning in urban areas. It is important this policy gives due attention to state reforms to eliminate duplication and provide clarity on its role in urban policy.

Conclusion

In conclusion, we think that the policy reads as a list of aspirations the Commonwealth has for better urban areas, rather than the concrete commitments needed from the federal government that will be genuinely transformative. We understand policy needs to be high level and should also be aspirational to an extent, but this policy is almost indistinguishable from existing state and local planning policy, yet the Commonwealth plays a different role from the states and

local government. The policy clearly wants our towns and cities to be better, but it lacks any real commitment to doing so and avoids any measurements that will allow people to see whether our urban areas are improving.

I confirm our submission can be made public.

If you have any questions, please contact Amanda Haycox, Coordinator, City Strategy and Place Planning on [REDACTED]

Yours sincerely

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Rosa Zouzoulas
Director, Planning and Place