

# The Government Architects Network of Australia

**PROJECT:** NATIONAL URBAN POLICY 2024  
**RE:** DRAFT 1 FEEDBACK

04 July 2024

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

This review has been undertaken by GANA (Government Architects Network of Australia). [GANA](#) is a formalised national collaborative of Government Architects and Associate Government Architects from each Australian state and territory. It provides a *united endorsement of relevant state and national policies, standards and guidelines*. GANA commends the Federal government's approach to developing a National Urban Policy, particularly the following aspects of the Policy:

- alignment with the United Nations Sustainable Development Goals
- The Goals – particularly the inclusion of the two new goals of resilience and equitability
- Intent for inclusion of a Vision Statement endorsed by all states and territories.
- Preamble acknowledging First Nations connection to Country and expertise – in terms of both long-term stewardship as well as the enduring identity and bond with Country
- [Urban Policy Forum](#) - the establishment of this advisory group which has strong cross disciplinary expertise and representation, including architectural, First Nations and urban policy
- Basic structure of the draft Policy – including a line of sight from problem statement and context through to suggested initiatives / solutions (except as noted)
- The statistical 'snapshot' sets the tone clearly and graphically (with some exceptions as noted)
- References throughout the document acknowledging First Nations 'knowledge and experience' and 'Insights' as key factors in sustainability and innovative problem solving
- The principles outlined in Appendix A, which are highly relevant, well framed and a strong foundation for this Policy.

There is great potential for the National Urban Policy to support positive improvements to the processes and practices that shape Australia's urban

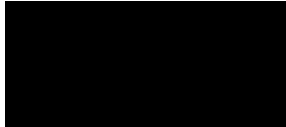
environments and advance discussion around suitable models for future urbanisation in Australia.

Acknowledging that the draft policy addresses a diverse range of issues and challenges facing Australian cities today, it will require further refinement to set a purposeful and aspirational vision, supported by clear principles and implementable strategies that can inform all scales of development - from national enabling infrastructure to local micro initiatives.

The National Urban Policy will be a valuable resource that assists GANA members in providing guidance that shapes future development in their respective state and territory jurisdictions. GANA supports the development of a shared Vision for sustainable growth in Cities and would welcome the ongoing involvement of the vision and policy as it develops.

More detailed commentary is provided on the following pages, for your further consideration.

Sincerely,



Abbie Galvin LFRAIA  
Executive Director Government Architect NSW

on behalf of GANA members

ISSUE		RECOMMENDATIONS
<b>PURPOSE / INTENT OF THE DRAFT POLICY</b>		
1.	The previous <b>2011 National Urban Policy</b> is mentioned. It includes a 3 stage, 10-year rollout but there's no information on how it performed or the expected timeframe of the current draft policy.	<ul style="list-style-type: none"> <li>• <i>Include a wrap up of the previous policy – including what was learnt</i></li> <li>• <i>provide a program for roll out of the current draft policy, and</i></li> <li>• <i>include provisions for regular review and update (assuming that this will be an ongoing Federal policy).</i></li> </ul>
2.	The scale of urban settlement that this draft policy applies to is unclear – use of term <i>urban</i> could exclude smaller cities and towns.	<ul style="list-style-type: none"> <li>• <i>Clarify that the draft policy refers to all Australian settlements – including cities, towns and villages.</i></li> </ul>
3.	Who is this policy for – other government agencies, the development industry, the consulting sector, or the general community?	<ul style="list-style-type: none"> <li>• <i>Clarify audience at the beginning of the policy</i></li> </ul>
4.	The intent to 'reinstate' a vision through collaboration with State and Territory governments is commended.  However, there are numerous references to 'place' and 'diverse places' but no acknowledgement of the unique <b>natural environments of Australia</b> - as a basis for strengthening / building <b>urban identity</b> . This is a vast country and despite the widely varying environmental conditions, towns and cities are increasingly generic and indistinguishable.	<ul style="list-style-type: none"> <li>• <i>Ensure the Vision Statement acknowledges the unique landscapes of Australia and promotes settlements that are 'of their place'.</i></li> </ul>
<b>DOCUMENT STRUCTURE</b>		
5.	The <b>statistical snapshot</b> identifies a range of useful population and economic indicators and sets the tone for the policy generally. But there are no statistics around <b>natural environment indicators</b> eg extinction rates or habitat loss due to urbanisation (20,212ha reduction of urban threatened species habitat from 2000 to 2017).	<p><i>Include indicators around:</i></p> <ul style="list-style-type: none"> <li>• <i>natural environment / habitat health</i></li> <li>• <i>correlation between loss of tree canopy and temperature increase</i></li> <li>• <i>impact of other phenomena such as flood, fire and weather events</i></li> </ul>
6.	The format of Goals and Objectives in the main document and principles at Appendix A lacks clarity – it is unclear how the principles are intended to be used. However, the principles at Appendix A are clear and well-articulated.	<ul style="list-style-type: none"> <li>• <i>The Goals, Objectives and Principles should have a clear line of sight and hierarchy</i></li> <li>• <i>relocate the higher-level principles into the body of the document.</i></li> </ul>
7.	The 'discussion' for each of the Objectives in part 4 – is inconsistent in terms of content, tone, level of detail and structure. It does not effectively set up the 'possible actions' that follow.	<ul style="list-style-type: none"> <li>• <i>Review the discussion text to ensure consistent and clear commentary that supports the recommendations that follow.</i></li> </ul>
8.	Further to item 8, the term 'possible actions' is unambitious for a National Urban Policy.	<ul style="list-style-type: none"> <li>• <i>Reframe these actions into a purposeful and targeted statements of intent.</i></li> </ul>

<b>FIRST NATIONS CULTURAL KNOWLEDGE AND CONSIDERATIONS</b>		
9.	Use of Singapore and Scotland alone as comparable international urban policy precedents – unclear how these are comparable to Australian conditions, as neither have First Nations presence.	<ul style="list-style-type: none"> <li>• <i>Include countries with a First Nations presence in the background research eg Canada, USA and New Zealand (Te Aranga Māori Design Principles)</i></li> </ul>
10.	<p>The references to First Nations perspectives are acknowledged but there is no clear position around a <b>national approach</b> to understanding and connecting with Country.</p> <p>The 31 topics identified by Murawin are summarised into 3 generic principles, which don't clearly convey what was learnt through consultation.</p>	<ul style="list-style-type: none"> <li>• <i>First Nations cultural knowledge of Country can / should inform strategies around placemaking</i></li> <li>• <i>the recommendations arising from Murawin's research and consultation should be more specifically acknowledged in the draft policy.</i></li> </ul>
<b>WELLBEING</b>		
11.	The link between better urban environments and <b>better health outcomes</b> is weak – particularly given that densification is noted as a key requirement to accommodating future growth.	<ul style="list-style-type: none"> <li>• <i>Include a link to the Federal policy and continued commitment to the "National Preventive Health Strategy 2021–2030" to complement the purpose of the proposal (Part 1 Purpose).</i></li> <li>• <i>specific strategies to strengthen urban health outcomes would be beneficial.</i></li> </ul>
12.	Document approach to public open space puts primary focus on open space for active uses and sport.	<ul style="list-style-type: none"> <li>• <i>The critical importance of public open space should be more strongly stated and should specifically include passive open space and diverse high quality open space</i></li> <li>• <i>include tree canopy and biodiversity targets.</i></li> </ul>
13.	Factors identified for the LIVABLE goal are very broad and exclude 'choice' and 'identity' as factors.	<ul style="list-style-type: none"> <li>• <i>Elaborate on the Liveable factors eg housing choice, transport choice, local character, Identity or 'Sense of Place'.</i></li> </ul>
<b>DESIGN and INNOVATION</b>		
14.	<p>There are numerous references to design, good design and <b>design quality outcomes</b> throughout the draft document – without any strategies as to how this can be achieved.</p> <p>Design quality is generally the exception rather than the rule in Australia today – often eclipsed by other issues or seen as 'optional extras' when it is actually the crucial 'connective tissue' between policy and delivery.</p>	<p><i>Include a stronger statement on the importance of the 'design lens' at every stage of urban development to create efficient and well resolved places that are not just fit for purpose, but which bring meaning and foster pride and wellbeing in their communities.</i></p>
15.	Part 2 sets out clearly the different levels of governance and responsibility for urban policy. This needs to be matched with the different	<p><i>The '<a href="#">Urban Design Protocol – Creating Places for People</a>' referenced at Appendix A, illustrates how urban policy needs to be applied to all scales of</i></p>

	scales of urban design that are affected by those levels of governance.	<i>urban design and should be a primary reference supporting this policy.</i>
16.	Principles in Appendix A stop short of committing to <b>Urban Design</b> to achieve outcomes, stopping at urban planning. To date, urban planning alone has not been able to provide the urban outcomes needed to address the inequity and lack of quality in current urban environments.	<i>Elevate Urban Design to be included in the overall commitment of Principles - integrating it into each Principle as a key to shifting the approach to urban form.</i>
17.	The importance of <b>innovation</b> generally should be more widely discussed – including the need for R+D, incentivising, opportunities for pilot programs, funding and risk sharing (particularly where there is strong reliance on private sector funding and public / private funding partnerships).	<ul style="list-style-type: none"> <li>• <i>Recognise and promote the role of industry and business sectors in research and development, pilot programs / projects etc.</i></li> <li>• <i>Consider incentives for industry and business to undertake R+D and pilot testing</i></li> <li>• <i>Establish a national depository of open-source data on previous pilot programs, initiatives and policy outcomes, ie a body of knowledge that supports future innovation initiatives.</i></li> </ul>
18.	There is a notable scarcity of suitably qualified design professionals in <b>regional locations</b> . In these areas, access to specialist design skills is often limited and sometimes entirely absent in both the consulting sector as well as in regional councils and agencies.  This is not only problematic from a development perspective, it also affects the level of general community awareness and debate around environmental quality issues.	<p><i>Ensure that there is adequate capacity and expertise in regional areas to effectively carry out the work and implement the programs. A strategy that enables this would include:</i></p> <ul style="list-style-type: none"> <li>• <i>Identifying the necessary capacity and expertise required in regional areas to implement programs effectively.</i></li> <li>• <i>Developing urban and environmental design capabilities in regional areas, including within local and regional councils.</i></li> </ul>
19.	The critical role of the <b>design professions</b> to bring fresh, innovative thinking to many of the challenges noted, has been overlooked.  The initiative to ‘ <i>support education . . . and future workforce skills in sustainable design . . .</i> ’ is supported as this will reduce reliance on outsourcing these skills internationally. However, there are no strong initiatives for <b>expanding capability</b> in sustainable design – particularly given the role of Federal Government in tertiary training as well as R&D in the tertiary sector.	<ul style="list-style-type: none"> <li>• <i>Include initiatives that support growth of ‘home grown’ capabilities in sustainable design and construction – including professional and vocational training, research and development etc</i></li> </ul>
<b>IMPLEMENTATION and GOVERNANCE</b>		
20.	It is difficult to understand the draft document in the overall <b>Federal policy context</b> eg Which other Federal agencies influence urban policy? Which agencies will administer / implement the initiatives in this policy?	<ul style="list-style-type: none"> <li>• <i>Amend <b>Urban Roles and Responsibilities</b> to include a reference to Appendix B.</i></li> <li>• <i>Amend Appendix B as noted below, including Federal agencies / portfolios tasked with</i></li> </ul>

	There is also a lack of clarity in relationship to state and local governments.	<p><i>delivering current and future initiatives, noting the following:</i></p> <ul style="list-style-type: none"> <li>○ <i>table is excessively long where initiatives are repeated for each objective. Reformat into a table or matrix that communicates where initiatives support several objectives.</i></li> <li>○ <i>clarify whether initiatives are proposed or already in place – include expected timing.</i></li> <li>○ <i>provide embedded links to the initiatives listed – for further reference.</i></li> </ul>
21.	<b>Implementation and timeframes</b> – Part 4 identifies ‘possible actions’ to address the 6 objectives identified, but no indication as to responsibilities, resourcing or timeframes within the life of this Policy.	<ul style="list-style-type: none"> <li>● <i>Include timeframes and responsibilities for initiatives – into the table outlined above.</i></li> </ul>
22.	Need for <b>seamless collaborations</b> – across all levels of government, across the public / private sectors and across the environmental design disciplines – is not strongly emphasised in the body of the document.	<i>This is referenced in Principle 1 <b>City planning and governance must be collaborative and adaptive</b> in Appendix A. Principles should be at the beginning of the document, preceding Goals and Objectives (as noted at item 7)</i>