



# Submission by the HEAL Network on the National Urban Policy for Australia consultation draft

Rebecca Bentley, Xiaoqi Feng, Adelle Mansour, Kate Mason, Paul Fleckney, Erika Martino, Ang Li, Craig Williams, Shilpi Tewari, Jason Byrne, Pooja Shah, Nicola Willand, Nanthi Bolan, Aditya Vyas, on behalf of the NHMRC Healthy Environments and Lives (HEAL) National Research Network.

## About the HEAL Network

The vision of the Healthy Environments and Lives (HEAL) Network is to catalyse research, knowledge exchange and translation into policy and practice that will bring measurable improvements to our health, the Australian health system, and the environment.

The HEAL Network is a broad coalition of 100 investigators and more than 30 organisations from across Australia that aims to bridge the gap between knowledge and action by bringing together Aboriginal and Torres Strait Islander wisdom, sustainable development, epidemiology, and data science and communication to address environmental and climate change, and its impacts on health across all Australian states and territories.

The HEAL Network focuses on participatory solutions-driven research that provides robust scientific evidence to underpin structural policy and practice changes. To meet this need, our collaboration includes Government health and environmental authorities; health sector organisations; Indigenous organisations; and data providers to integrate a complex social, environmental, economic and institutional ecosystem into a cohesive, multidisciplinary research network.

The HEAL National Research Network has a strong capacity to provide strategic advice on policy for the health impacts of environmental and climate change, and we welcome the opportunity to provide this submission on the consultation draft of the National Urban Policy. The issues identified and recommendations below come from a number of HEAL Network investigators.

We would welcome the opportunity for further engagement with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to provide assistance on the development of the National Urban Policy.

## Overarching recommendations from the HEAL Network

- We strongly recommend aligning the National Urban Policy directly with other key government policies that intersect with urban environments including:
  - National Housing Accord
  - National Health and Climate Strategy
  - National Preventive Health Strategy 2021-2030
  - The State of Diabetes Mellitus in Australia
  - National Agreement on Closing the Gap
  - Australia's Strategy for Nature
  - Victorian Fair Access Policy Roadmap.

- The “possible actions” under each of the six objectives in Part 4 of the draft Policy should identify specific next steps and provide timeframes for achieving these actions.
- We applaud efforts on First Nations engagement in the development of the draft Policy (described on page 11). We recommend that the final Policy clearly identifies the mechanism for working ongoingly with First Nations people to leverage their knowledge of creating urban spaces that nurture a sense of belonging and connectedness to Country.
- Australian evidence should be further prioritised in developing actions to achieve the Policy’s ambitions. Some examples are provided below.
- While urban migration has been referenced 16 times in the draft Policy, more clarity is required on how the Policy will meet challenges related to urban migration, particularly those outlined by international guidance (United Nations Human Settlements Programme (UN-Habitat), 2024).
- Further quantitative and qualitative assessment of the Policy’s directions in the context of a rapidly growing population and changing demographics would strengthen the existing content.
- We recommend further articulation of how multisectoral planning and implementation strategies would be developed, involving transport, engineering, health, irrigation, green spaces and more.
- We recommend a review of the language used throughout the document, in order to move away from a deficit discourse, and towards empowering or strengths-based language (e.g., page 38 states “providing targeted support for vulnerable Australians, including people with disability...”).

## **Recommendations against the Australian Government objectives in Part 4 of the draft Policy**

### **No-one and no place left behind**

- Identify and describe the government organisations necessary to enable alignment across institutions and stakeholders. We note that coordination is a critical ingredient for addressing the challenges identified in the Policy that involve more than one sector (e.g., housing, health, social services, and infrastructure).
- We note that actions and pathways to achieve high-quality housing have not been identified. Consider relating development of this Policy to rental minimum standards and retrofit programs currently supported by State governments.
- People who experience family and domestic violence or mental health issues make up a large proportion of homeless populations. Consequently, the delivery of homelessness services should have “wrap around” support from health and social services. This should be considered more strongly in the Policy.
- The Policy identifies market forces, supply and demand, that drive the housing affordability crisis. This current framing neglects the institutional arrangements that influence the level of supply and demand, and are potential leverage points. For example, tax policies currently incentivise high demand from investors and crowd out first-home buyers. The Policy should acknowledge the complexity and effects of institutional rules (Pawson, Milligan and Yates, 2020).

## Our urban areas are safe

- Bushfires and wildfires are increasingly becoming a serious issue in peri-urban areas where the built environment meets or intermixes with the natural wildland environment. In addition, wildfires are becoming larger and more destructive as they burn in the wildland urban interface – where human development meets or intermixes with undeveloped wildland fuel. Wildfires are increasing in both frequency and severity due to climate change, the expansion of interface communities, and historical land management practices. The Policy is currently lacking a discussion of possible actions and the responsible government organisations for ensuring that housing is located in areas that do not face a high risk of natural hazards (such as building on flood and bushfire zones).
- The Policy would benefit from further discussion of the interaction between emergency response services and the safety of urban environments. For example, the Policy could address the role of advanced planning for safe havens, evacuation centres, clean air shelters, and cooling centres in response to climate-related events such as bushfires and floods.
- The Policy would benefit from further discussion of short-term and long-term responses to the release of contaminants into urban environments following natural disasters related to climate change (Bolan *et al.*, 2024), as well as ubiquitous exposure to hazards such as air pollution in the urban environment, secondary to point sources such as wood heater smoke (Vardoulakis *et al.*, 2024).

## Our urban areas are sustainable

- The Policy would benefit from further discussion of addressing urban issues related to building energy efficiency (e.g., roof colour, structure and design, heating and cooling), ventilation, and indoor air quality.
- Similarly, a discussion of prevention and mitigation strategies to address food, water and energy insecurity in urban areas would strengthen the document.
- While Appendix B lists out national initiatives underway, clearer linkages to issues identified in Part 4 would strengthen the government's policy direction.

## Our urban environments and communities promote health and wellbeing

- The Policy should more explicitly address urban environments as healthy food environments and obesogenic environments (Astell-Burt and Feng, 2015; Feng *et al.*, 2018). The recent parliamentary inquiry on the state of diabetes mellitus in Australia recommended that the Australian Government, in consultation and cooperation with state and territory governments, develops a best practice framework to tackle the problem of obesogenic environments, including through better urban planning and the development of physical activity initiatives, and support efforts to increase access to regular exercise in schools and neighbourhoods as a matter of urgency (Parliament of Australia Standing Committee on Health, Aged Care and Sport, 2024). These findings should be incorporated into the Policy.
- The Policy should more explicitly address urban environments in relation to access to nature including:
  - Green space: the draft Policy recognises the importance of urban green space for many facets of human health and wellbeing. It could go further to recognise the need not just access nature but to connect with it, which is an

objective of Australia's Strategy for Nature 2019-2030 (Commonwealth of Australia, 2019). This is particularly important for children growing up in urban areas, as experiences at this age shape connection to nature, and its benefits for wellbeing and stewardship behaviours, throughout life. Ensuring that greening initiatives are inclusive to different population groups is also an important feature which should be emphasised in the Policy.

- Light pollution: the National Environmental Science Program has identified that light pollution is an important factor for healthy urban environments (Flies *et al.*, 2023). Mechanisms for management of this facet of the urban environment should be further emphasised in the Policy.
- The aspiration to make urban green and blue spaces of sufficient quality and accessible in an equitable fashion expressed in the Policy must be supported with State or national level agreed standards for green space provision, sufficient financial incentivisation at a national scale, and decision-support framework and tools that consider all benefits of green space to ensure equity of access. Health economics methods could be used to quantify the economic benefits of healthy urban environments and design incentives.
- We support the Policy's focus on investments in sports infrastructure, as sporting facilities can promote community values and foster a sense of belonging and pride in local communities. We recommend the Policy highlights the importance of making these spaces inclusive and welcome to groups that historically have been excluded from these facilities, especially girls and women, and people from culturally and linguistically diverse (CALD) backgrounds. The Victorian Fair Access Policy Roadmap could be a useful model as a starting point (Office for Women in Sport and Recreation, Sport and Recreation Victoria and Victorian Health Promotion Foundation (VicHealth), 2024).
- The Policy does well to emphasise the importance of physical activity and social cohesion as contributors to positive health. We recommend further discussion and acknowledgment that parks, recreational facilities and public spaces can support passive, reflective and restorative activities which can aid mental health, in addition to active sporting physical activity.
- Mental health is only mentioned once in the draft Policy. We recommend greater emphasis on mental health, especially youth mental health in this Policy. There are several actions that can be taken at an urban policy level to address this issue, including making our public and community spaces places where youth feel welcome, and they feel a sense of belonging. Public space is critical for young people as a site of interaction and retreat, and it needs to fulfil both these purposes.

## References

- Astell-Burt, T. and Feng, X. (2015) 'Geographic inequity in healthy food environment and type 2 diabetes: can we please turn off the tap?', *Medical Journal of Australia*, 203(6). Available at: <https://www.mja.com.au/journal/2015/203/6/geographic-inequity-healthy-food-environment-and-type-2-diabetes-can-we-please>.
- Bolan, S. *et al.* (2024) 'Impacts of climate change on the fate of contaminants through extreme weather events', *Science of The Total Environment*, 909, p. 168388. Available at: <https://doi.org/10.1016/j.scitotenv.2023.168388>.
- Commonwealth of Australia (2019) *Australia's Strategy for Nature 2019-2030*. Canberra: Commonwealth of Australia. Available at: <https://www.australiasnaturehub.gov.au/national-strategy>.
- Feng, X. *et al.* (2018) 'Modest ratios of fast food outlets to supermarkets and green grocers are associated with higher body mass index: Longitudinal analysis of a sample of 15,229 Australians aged 45 years and older in the Australian National Liveability Study', *Health & Place*, 49, pp. 101–110. Available at: <https://doi.org/10.1016/j.healthplace.2017.10.004>.
- Flies, Emily; Allegretto, Gabriella; Kendal, Dave; Somerville, Adele; Anderson, Sharolyn; Ogg, Marnie; *et al.* (2023) *The human values of dark skies: Light pollution as an emerging justice issue*. Hobart: Sustainable Communities and Waste Hub: Sustainable People Environment Interactions (IP1). Available at: <https://doi.org/10.25959/24797043>.
- Office for Women in Sport and Recreation, Sport and Recreation Victoria and Victorian Health Promotion Foundation (VicHealth) (2024) *Fair Access Policy Roadmap*. Melbourne: State of Victoria. Available at: <https://changeourgame.vic.gov.au/leadership-centre/fair-access>.
- Parliament of Australia Standing Committee on Health, Aged Care and Sport (2024) *The State of Diabetes Mellitus in Australia in 2024*. Canberra: Commonwealth of Australia. Available at: [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Health\\_Aged\\_Care\\_and\\_Sport/Inquiry\\_into\\_Diabetes/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Health_Aged_Care_and_Sport/Inquiry_into_Diabetes/Report).
- Pawson, H., Milligan, V. and Yates, J. (2020) *Housing Policy in Australia: A Case for System Reform*. Singapore: Springer Nature. Available at: <https://doi.org/10.1007/978-981-15-0780-9>.
- United Nations Human Settlements Programme (UN-Habitat) (2024) *Urban Migration*. Available at: <https://unhabitat.org/topic/urban-migration> (Accessed: 18 July 2024).
- Vardoulakis, S. *et al.* (2024) 'Wood heater smoke and mortality in the Australian Capital Territory: a rapid health impact assessment', *Medical Journal of Australia*, 220(1), pp. 29–34. Available at: <https://doi.org/10.5694/mja2.52176>.