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Department of Infrastructure, Transport,  
Regional Development, Communications  
and the Arts  
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Canberra ACT 2601

via email: [urbanpolicyinput@infrastructure.gov.au](mailto:urbanpolicyinput@infrastructure.gov.au)

Dear Sir / Madam

### **Submission on the National Urban Policy**

Thank you for the opportunity to review and provide comments on the National Urban Policy (NUP). This submission is provided from the perspective of communities that are outside of the Greater Metropolitan areas. The primary grounds of this submission are that the NUP:

1. Is not clearly or deliberately inclusive of areas outside of the greater metropolitan areas and larger cities.
2. Is inconsistent in the application of the terms urban areas, cities, towns and suburbs, as such it is not clear if the NUP does apply to smaller urban areas.
3. The monitoring and review of the NUP should include - but extend beyond - the State of Australian Cities reporting – to report on the achievement of outcomes derived from the goals and objectives. It should have a review cycle.
4. Would be made clearer for all users - including elected representatives and funding administrators by the inclusion of definitions, of Cities, Towns, Urban Areas.
5. Would be strengthened by the inclusion of an implementation section, as it is unclear where the NUP will sit in the prioritisation of Government funding.

### **Timeframe for feedback**

The draft NUP submission period was just six weeks from 23 May to 3 July. A six week submission period, at the end of the financial year is insufficient to allow for a robust review of the document and approval at an executive / board level.

It is requested that a further review period be provided, once the NUP has been updated following this round of consultation. This further consultation could include targeted consultation with regional organisations and submitters from regional places. At this point the document has a strong emphasis on major cities, and does not adequately reflect a regional perspective.

We look forward to the opportunity to provide further comment.

## **Context**

Approximately 18 Million of Australia's 26.5 Million people live in the Greater Metropolitan areas. The remaining 8.5 million (33%) of people live in urban areas - cities, towns and villages ranging in size from a few hundred people to 150,000 people.

The draft NUP, is not clearly or deliberately inclusive of areas outside the Greater Metropolitan areas and larger cities. The Shared Vision states "in order to respond to the challenges facing our cities, a strong vision is needed to better incorporate urban policy across out nation and better integrate and guide future decision-making, investment and policy".

We applaud the NUP "goals and objectives to enable our urban areas to be liveable, equitable, sustainable and resilient" (page 9), however the NUP is inconsistent in how it refers to urban areas - and particularly how this relates to urban areas outside of cities for example, Cairns, Cardwell, Ingham, Innisfail, Bundaberg, Gladstone, Mount Isa, Ballarat, Bendigo, Mildura, Katherine, Alice Springs, Launceston, Charters Towers, Bamaga, Weipa, Yarrabah and Palm Island.

Many smaller cities and towns are now at a critical juncture where where growth cannot easily be absorbed into exisiting infrastructure and now require a duplication of the existing services and infrastructure to be able to absorb the growing population. These places have been off the State and National radar as they have traditionally had capacity to absorb growth within existing infrastructure. Likewise, many of these cities and towns have not had the need or capacity to plan are now finding an increasing imperative to plan for more roads, sporting precincts, arts facilities, schools, suburbs, shops etc. These places are also at increasing risk of loss of identity and character. They will potentially benefit greatly from the NUP, however it is not clear if or how the NUP would apply.

## **Monitoring and Review**

The monitoring and review of the NUP should include - but extend beyond - the State of Australian Cities reporting – to report on the achievement of outcomes derived from the goals and objectives. It should have a review cycle.

This will provide information on the success or otherwise of policy, funding and intervention measures and ensure that the right funding is given to the right needs for any given urban area, city, town or suburb.

## **Need for definitions**

The NUP would be clearer for all users - including politicians and funding administrators with the inclusion of definitions, for example:

- Urban - places with 200 people or more
- Town - places with 5000 people or more
- Cities - places with 100,000 people or more

Without a definition of 'Urban Areas' or 'Urban Settlements' it is unclear what size urban areas are intended to be included. The lack of clarity is reinforced by the inconsistent use of the words City and Urban. The NUP would provide more certainty, by referring to cities, towns and suburbs.

The terminology should align with the Australian Statistical Geography Standard (ASGS). While they don't need to align in this section - there should be a definition that goes into further detail. This is important because the further allocation of funding is likely to rely on this standard. It should also be acknowledged that Remote areas have an urban role for the purpose of the NUP. As it is written, the Role of Local Government is again inconsistent with the wording across the rest of the document, and these inconsistencies create uncertainty of the application of the policy.

The ASGS Remoteness Structure defines 5 classes of relative geographic remoteness across Australia. These 5 classes are:

- Major Cities of Australia
- Inner Regional Australia
- Outer Regional Australia
- Remote Australia
- Very Remote Australia

Relative geographic remoteness is measured in an objective way using the Accessibility/Remoteness Index of Australia Plus (ARIA+).

ARIA+ is derived by measuring road distance from various populated locations to five categories of service centre, using population as a proxy measure for service availability. ARIA+ uses ASGS Edition 3 Urban Centres and Localities and 2021 Census of Population and Housing data to reflect different levels of service availability based on five defined population ranges

#### **Need for consistent and inclusive references to urban areas, cities, towns and suburbs**

The NUP is inconsistent in how it refers to urban areas, cities, towns and suburbs. Our urban areas are more than the Greater Metropolitan areas or the 20 largest cities that formed part of the Smart Cities Plan, and the NUP needs to be clear on this. Examples are as follows:

1. The Overview (page 9) refers to:-
  - a. "... national urban policy goals and objectives to enable our urban areas to be liveable, equitable, sustainable and resilient. The policy includes a shared vision for sustainable growth in our cities and suburbs. The NUP would be more inclusive by consistently referring to cities, towns and suburbs."
  - b. A more inclusive, and clearer statement would refer to "...a shared vision for sustainable growth in our cities, towns and suburbs."
  - c. "The policy aims to provide a national lift in the quality of life in our cities and urban areas". The NUP seems to be unclear about the application of the policy. Is there a need to distinguish between cities and urban areas.
2. The Shared Vision (page 13) refers to the "challenges facing our cities".

#### **Objectives and Area of Focus**

The Objectives and Areas of Focus (page 6) section is possibly missing some matters:

- a. No-one and no place left behind: the areas of focus under this heading could be expanded to include Housing mix and housing that is suitable to the climate.

- b. All people belong and are welcome: refers to investment in sport infrastructure, yet for arts and culture it is access to rather than investment in and for natural and culturally important heritage it is protected. Ideally a National Urban Policy seeks to invest and grow arts and culture, natural and culturally important sites and landmarks as well as sport.  
This section could also be expanded to recognise urban areas are diverse and they are not just cities, they are outer suburbs and they are the cities, towns and villages that range in size across the nation.
- c. Our urban areas are suitable: There is an opportunity to expand this section to refer to all pillars of sustainability. It seems to be repetitive on the emissions side and then light on the economy and culture side.
- d. Our urban environments and communities promote health and wellbeing: could be expanded to include recognition of, definition of and promotion of urban character, particularly as populations grow - and the focus on developing neighbourhoods with character (especially as our populations grow).

There is limited reference to public transport, cycling and pedestrian networks, multimodal access, movement in place or other accessibility and movement matters that make cities function, nor a distinction for nationally important freight routes, which may include routes that are located between smaller urban centres and towns.

## **The Principles**

The Principles state that “city planning and governance must be....” This would read better if it simply says “planning and governance must be”, in this way the Principle is inclusive of Urban areas, cities and towns.

## **How does the NUP fit with the Regional Investment Framework?**

From the section about Regional Investment (page 14) it is not clear if the NUP is intended to include Regions or not, as it says that regional places and large regional cities:

- will benefit from the new Regional Investment Framework.
- together, the Regional Investment Framework and the National Urban Policy will seek to support the sustainable growth of cities and regions across Australia.

This section introduces new terminology of regional places and large regional cities and regions.

It is important that the NUP is clear on where it will apply – as funding will be linked to it.

## **Goals**

It is the second Goal of - Equity “Where everyone has fair access to resources, opportunities and amenities, no matter where they live or their socio-economic status” that implies that Urban Areas, Cities, Towns and suburbs are included in the NUP, however the The use of the terms city, urban area, town and suburbs are not consistent in the Goals:

1. Liveable: Where people can live in a place of their choosing, within their means, suitable to their needs. This is a safe, well designed, well-built city that promotes active, independent living, quality of life and connections within the community.

2. Productive: Where cities foster shared prosperity and provide economic opportunities by enabling goods and services to move efficiently, and providing people with access to employment, services and infrastructure.
3. Resilient: Where our cities are economically, socially and environmentally resilient to the impacts of change, including changing climate and increasing exposure to climate-related hazards

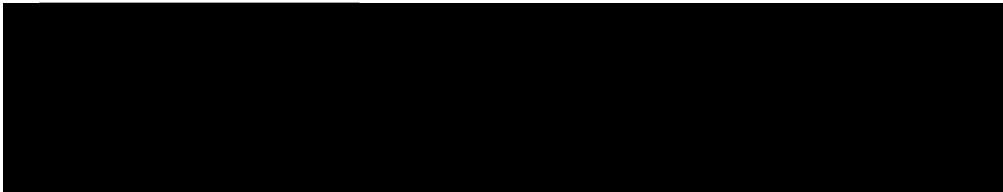
### **Governance and Implementation**

The NUP does not have an implementation section, and it is unclear where the NUP will sit in the prioritisation of Government funding.

Governance and implementation would be strengthened by improved regional representation and input as the NUP evolves.

Thank you again for the opportunity to provide comment on the NUP. We look forward to the opportunity for further involvement in the future.

Yours sincerely,



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