Draft National Urban Policy

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First, I should say having a National Urban Policy is, in principle, a good thing and the consultative approach taken to date by the Cities and Suburbs Unit has been commendable. As you have heard, no doubt, during the policy development and consultation processes, what turns something that is good in principle into something good in practice is a reasonable degree of definition of key terms, objectives, responsibilities, timelines, resources and bringing them all together — a robust implementation strategy.

My comments and suggestions touch on some of these.

1. Traditions

Apart from three earlier episodes, Commonwealth governments have traditionally avoided any explicit intervention in the planning of particular cities or in the national pattern of city development. Usually, this is based on an assumption that the Commonwealth has no constitutional right to intervene in this way, whereas while it might not have an obligation to do so, it is not prohibited from doing so. Clearly, political judgements are also made about the merits of intervening strongly and provoking hostility from the States and Territories.

It can be useful to distinguish between initiatives/programs designed specifically to meet some sort of national urban policy objectives and those that have a significant urban/spatial impact but are not explicitly linked to a national urban policy. Commonwealth governments intervene and invest in myriad ways that have a significant impact on cities or urban areas, without being part of a national urban policy, but this risks a degree of disconnect and discontinuity when investing scare public resources.

A new and plausible National Urban Policy needs to be built on a clear statement of why a more explicit and specific approach is necessary and how it will be better than the typical status quo. This requires a reasonably precise and clear definition of what is meant in this context by 'national' and 'urban', recognising the political attractiveness of maintaining a degree of ambiguity in these definitions.

2. Definitions and terminology

Various terms and phrases are used in the draft NUP to describe the focus or target of policy, including:

- Cities
- Suburbs
- Urban areas
- Major cities
- Metropolitan regions

- Regions
- Largest cities
- Regional urban centres
- Rapidly urbanising areas
- Other areas facing urban challenges

Some of these have been formally defined (eg by the ABS), while others are used in different ways by different people and entities. There is merit in seeing and defining some of these terms as part of a

hierarchy of settlements, while recognising that any such hierarchy can have both positive and negative associations (eg there may be economies of scale and beneficial agglomeration effects but the scale and complexity of problems may also grow with size). Some have argued, often without strong evidence, that there is an optimum size of towns or cities, above which these places become increasingly dysfunctional and unliveable.

Two combinations seem especially ambiguous: cities and suburbs, and urban and regional. In my view cities represent a combination of suburbs, some of which will might be near the historic centre of a city while other are on the peri-urban fringe, not something distinct from suburbs. Region is also used variably - in some cases to describe rural and remote places and in other cases refers to metropolitan-scale conurbations, consisting of a number of cities (SEQ for example). In both cases, greater clarity would be welcome, although perhaps not by everyone.

3. Spatial dimension

Most local governments in Australia have some form of planning scheme (the terminology might vary) that provides a spatial application of other preferences and priorities. Land use maps, zones and overlays all serve to ground these preferences and priorities: the protection of heritage buildings or landscapes; the preservation of high quality agricultural land; the minimisation of risk from flooding or bushfires and so on. They also, typically, identify areas where growth (housing, jobs, critical infrastructure, social, community and health services, shops, recreational facilities etc) is encouraged and either discouraged or prohibited. These local spatial plans are, typically, endorsed by and indeed produced at the behest of State and Territory governments, perhaps via an intermediate scale regional plan (such as Queensland's SEQRP).

There is, therefore, an established case for having spatial plans at the local, regional and state level. This raises the question of whether the Commonwealth should also have a spatial plan or strategy that reflects its national ambitions for how growth might be managed around the country as a whole, and if not, why not?

4. City Deals and Area-Based Initiatives

If it is sensible to spend most of whatever Commonwealth money is allocated to the NUP directly in pursuit of its objectives (in contrast to indirect but important expenditure supporting the work of the Cities and Suburbs Unit, or producing a periodic State of the Cities report, or supporting ongoing engagement with First Nations people and organisations), then in my view, some form of Area-Based-Initiative (ABI) is the best way to do so. It allows scarce resources to be targeted to priority areas, it allows experimentation and learning, and it can stimulate innovative inter-governmental partnerships. The success of ABIs developed as part of national urban policy programs in other similar countries and at other times has been mixed, but the potential to learn from the most successful remains.

City Deals have been in existence in Australia for some years and demonstrate significant variation in terms of their scope, approach and success. A redefined (and possibly renamed) City Deals program could serve as the foundation for a more successful ABI as the main delivery vehicle for the NUP. Experience from elsewhere suggests that more comprehensive, clear and rigorous selection criteria should be developed and applied in a transparent manner. However, this reinforces the case for the Commonwealth developing a spatial strategy that gives underlying coherence to these more specific selection criteria.

5. National leadership but partnership in governance

It is sometimes said that it would be unconstitutional for the Commonwealth to develop an explicit national urban policy: it would have exceeded its powers which would, in turn provoke unproductive conflict with the States and Territories. One can imagine a *dirigiste* approach that would justify these fears and responses, but it is also possible to imagine a much more collaborative approach in which the Commonwealth plans **with** the States and Territories and other relevant bodies (perhaps as COAG did in its better moments). Indeed, the principles that underpin the current process of develop a NUP appear to be value collaboration. Collaborative governance mechanisms between different levels of government are not new and lessons can be learned from other instances and applied in this case.

6. Continuity and coherence

Because cities (or urban areas, towns or suburbs) are where most of us live, work, study, shop and recreate they represent an extremely important locus for many ostensibly different policies and programs of all levels of government. It is where we experience the housing crisis, traffic congestion, cultural enrichment, education and economic opportunities. If we are not willing and able to think carefully about how policy initiatives designed to address these challenges and promote these opportunities come together in actual places (towns, cities, suburbs, metro-regions) then we risk them pulling in different directions and undermining each other. Local growth management strategies, regional strategic plans and neighbourhood plans all try to do this at different spatial scales, with varying degrees of success. I see no compelling case for the Commonwealth government avoiding this planning challenge and a National Urban Policy, with a clear spatial dimension represents a sensible and bold intervention.

The success of any spatial plan or strategy depends on many factors, but having as sensible timeframe is one of the most important. Complex urban challenges (like the current housing crisis) are years in the making and will take years to solve or ameliorate. Of course, immediate steps can and should be taken, but they should be (and be seen to be) part of a longer term, coherent plan. While it is impossible to anticipate in detail the stance taken by future governments, experience from elsewhere suggests that investment in building a multi-party consensus to reduces the likelihood of dramatic changes in policy direction is worthwhile (but not easy).

This suggests that a national spatial strategy that recognises the existence and significance of all types and sizes of settlement might avoid some of the unhelpful polarisation between towns and cities, urban and rural areas, and between growing and declining areas that have bedevilled urban policy debates in the past.

7. Monitoring and evaluation

In order to keep track of the impact and effectiveness of all types of policy intervention and program, robust frameworks for monitoring and evaluation are essential. They enable learning from mistakes as well as successes and allow informed adjustments to be made over time, again increasing the prospect of broad-scale policy continuity and cross-party support.

Elsewhere, monitoring and evaluation programs are often under-resourced and commenced sometime after a program has started. Establishing robust and reliable baseline data sets, and allocating sufficient expertise and funding to monitoring and evaluation regimes would lay a solid foundation to the development of a long-lasting and effective National Urban Policy.