

Thursday 4 July 2024

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

To whom it may concern,



Re: Draft National Urban Policy Submission

Thank you for inviting submissions on the Draft National Urban Policy. I would like to submit my support for this much-needed policy development. I also suggest that it be strengthened so that it clearly asserts the transformational changes that we need in our urban neighbourhoods for the common good.

My point of view is as an Australian citizen, a professional urban designer, and as a researcher currently working on a NSW Byera Hadley Travelling Scholarship on designing streets for children to walk to primary school. I am concerned about multiple crises in climate and biodiversity, widening inequality, and an epidemic of physical inactivity amongst a 'backseat generation' of children who currently have very little independent access to the public realm. These challenges can be addressed in our urban environments (as well as elsewhere) if we make substantive changes that also improve our quality of life. We have a responsibility to act in the interests of our local urban communities, our nation, and for our future generations.

Please accept these recommendations to help ensure that this Policy is suited to the scale of the challenges facing Australians in our cities and towns.

Citizen participation in national urban policy making

It is excellent that The Policy recognises the importance of community participation in city-making. (We should note that this activity involves not only planning but also design, and urban design in particular).

"Community participation in the [design and] planning and development of our cities and suburbs is critical to ensure [design and] planning outcomes reflect the needs and aspirations of the individuals affected. This involvement in the [design and] planning of our cities and suburbs can bring together diverse knowledge, mutual learnings and a sense of ownership of results."

However, this "critical" need for people's participation is, in this particular policy development context, contradicted by The Policy's apparently closed vision-making process:

"In February 2024 an inter-jurisdictional working group was established to support drafting the shared vision for sustainable urban growth, and for the Commonwealth to consult in developing the Policy and State of the Cities Report."

Why not invite Australian citizens to inform our national urban policy?

Perhaps the current draft Policy's shortcomings in regards to a lack of specific and substantive changes may be somewhat due to its limited basis on which it can form clear and effective recommendations for actions? If so, inviting citizens to deliberate upon the vision for our urban policy will provide significantly more secure foundations for this Policy, enabling it to recommend actions that are truly targeted to address our urban communities' specific needs because it has heard directly from people what their priorities are.

I recommend:

1. Call a national Citizens Assembly to deliberate on urban policy and to report to the Australian Parliament and the Australian people on their recommendations. (Note that it would be important to express that 'urban' inclusively applies to metropolitan, provincial, and regional cities and towns – 'urban' is not an antonym of 'regional', and regional people should not feel left out.)

Transformational change is required for healthy streets and healthy communities

The Policy contains many excellent considerations, but needs to extend into recommending clear and specific actions for the Australian Government to implement. Robert Freestone and Bob Webb expressed this well in *The Conversation*, "*The most troubling gap [in the Draft National Urban Policy] relates to specifics on how the desired urban transformation will be achieved in practice.*"

Health and wellbeing are frequently raised in The Policy, which is most appropriate. Health and wellbeing should be elevated to an overarching aim that is applied in the Policy vision and in every goal, objective, and principle. A precedent for this is London's wholehearted implementation of the [Healthy Streets Approach](#) throughout many policy areas, and this has helped create significant improvement in their city's ability to support healthy activities everyday.

The Policy recognises the health and safety challenges that people face on the street, but it would be constructive to identify and prioritise methods to retrofit existing streets so that they better serve people's health, safety, comfort, and enjoyment. National leadership in this domain is required to align any physical changes we make in streets with social changes throughout local communities. In this process, it is essential for governments at all levels to reach out and provide practical help people to enjoy more healthy and sustainable activities everyday.

Active travel should be recognised in particular as supporting every goal, objective, and principle in The Policy. It is an incredibly healthy activity, but it is currently substantially under-represented. This is due in large part to the car dependency of our urban environments, which is appropriately called out. What is concerning, however, are the statistics provided in the front of The Policy on road transport and road freight. These are anathematic to healthy urban areas, and in the absence of an explicit policy for 'vision and validate', there is a clear risk that this framing may support highly regressive 'predict and provide' developments for more urban roads in the future.

It is right to recognise the sustainability potential of active travel, and this is perhaps somewhat underappreciated in The Policy. However, in the urban context, it is government standards, policies, and actions that are most important in enhancing sustainability. Equivocating with the role of industry, as in, "*However, coordinated leadership from government and industry on emissions reduction actions will be key to achieving effective climate action in our major cities*" does not take adequate responsibility for the role of national leadership in urban sustainability.

Children's rights and health in the urban realm requires greater expression in The Policy. For example, children are only mentioned in the context of supervised environments (schools, childcare, housing), so their right of access to the public realm is not mentioned. In practice, they require safe, healthy, comfortable, and enjoyable access to all local destinations including schools, public open spaces, and community facilities.

Lastly, productivity considerations should recognise the incredible potential for healthy active travel as an economic opportunity. Evidence from London should be called upon where they have experienced greater than 1:100 scale returns on their investments in active neighbourhoods (Aldred et al. 2024). We should also note that political leaders there who have steadfastly supported healthy streets and active neighbourhoods have enjoyed increased support from their constituents at election time. In Australia, active travel has the potential to provide similarly strong results, however federal and state leadership and funding is required to achieve these affects at scale.

I recommend:

2. The Policy explicitly endorses the [Healthy Streets Approach](#), and requires that all urban policy, funding, design and planning practice, and outcomes are genuinely aligned and consistent with human health and wellbeing.
3. The Policy should set clear targets for health and wellbeing, and these should be measured and published in the national 'wellbeing budget' and Measuring What Matters report.
4. The Policy should address all federal policy and regulatory domains that interact with urbanism.
5. Active travel is an essential opportunity for people to enjoy regular physical activity and social interactions, and I support the City of Sydney's recommendation to *"Require only urban development and transport patterns that support active transport and consequently health outcomes as a condition of funding."*
6. I also support the City of Sydney's recommendation to *"significantly increase funding for active and public transport infrastructure and stop funding road projects in urban areas."*
7. The Policy must explicitly take a 'vision and validate' approach to design and planning, particularly in shaping urban streets.
8. The Policy needs to recognise the right of children to enjoy independent access to the urban realm. This should be expressed in every objective.
9. In practical terms, The Policy should recommend a network of active streets in every town and city. These are streets where both walking and cycling are prioritised and where the speed and volume of car traffic is moderated and restricted to local access only. This is needed to provide equitable access to active travel opportunities in every neighbourhood.
10. Recognise the productivity potential of investments in active travel.
11. Invest substantively in active travel.

Health and safety need to be considered together

Safety is rightly considered highly important in The Policy, which is excellent.

“Safe road environments are important for encouraging active transport. The high number of private vehicles in our cities and suburbs heightens road safety risks, especially for vulnerable road users, pedestrians and cyclists. Addressing this challenge requires a shift from traditional road design to a focus on designing streets to maximise safe access for shared use. Core to urban safety and mobility are safe and appropriate speed limits and roads designed to safely support multiple modes of travel, including walking and cycling.”

A minor but necessary improvement to this discussion, and to incorporate throughout The Policy, is to address the differences between streets and roads in urban contexts, and to prioritise urban policy-making for streets. The importance of roads in an urban policy context is limited to main roads and motorways, otherwise other roads lie outside the urban realm.

In contrast, this possible action; *“utilise road safety programs to make travel safer for all road users by improving safety standards and road design”*, appears misguided. Safe standards and designs are important, but the action we need to address people’s safety in streets is to substantially reduce or remove car traffic dangers in local street environments. One particular demographic who must be referenced in the street safety context is children.

The Policy risks framing safety in risk-averse approaches that fail to serve the interests of health, community, and society. It is essential that this is updated with holistic approaches to ensure that increasing safety does not come at the expense of health and wellbeing. For example, when it comes to walking to school, we need to consider not only car traffic dangers but also children’s health and wellness, since policies that effectively encourage all parents to drive their children right to the school gate for their children’s safety increase the risk of childhood obesity and other problems.

Another concerning aspect is in equivocal prioritisation; *“Safety in movement: Australia’s cities should be safe to travel in, whether in a private vehicle, on public transport or walking and cycling.”* This may be part of a concerning tendency to regard street safety starting with a vehicular-based consideration, and it risks contradicting state policies such as the TfNSW Order of Consideration for Road Users. The role of national policy is to ensure that an explicitly people-first prioritisation is established at federal level and then genuinely and effectively carried out in all urban streets.

I recommend:

12. Identify the differences between streets and roads, and prioritise policy-making for streets.
13. Prioritise safety on streets by acting to substantially reduce or remove car traffic dangers.
14. Specifically mention children amongst the *“individuals and communities experience higher risks to safety”*, and ensure safety is considered holistically with health and wellbeing.
15. Implement the urbanism practice standard modal hierarchy and require all policy-making for streets to be consistent with this; *Walking and staying activities first, then cycling, public transport, freight, shared vehicles, then private vehicles.*

Recognise the role of urban design in urban policy and practice

I support Caroline Stalker's expression of the importance of design:

"Design integrates. It makes a whole from parts. Design is the difference between a road and a street, a plan and a place, a leftover space and a place people love. Urban design is instrumental in offering more people better access to transport, jobs, urban culture, participation in city life. In supporting health and wellbeing in cities. In helping meet our emissions reductions targets."

I recommend:

16. I endorse Caroline Stalker's recommendation:

"I am proposing that the document establishes the national principle that urban design is a core part of every major urban project, be it a neighbourhood plan, a transport project, a major building, a community space, a city strategy. Because currently it's not. And the delivery of this policy will flounder without it."

17. The Policy should also recognise and prioritise the importance of high quality tertiary education in both urban design and urban planning in delivering better urban outcomes.

Summary

This Draft National Urban Policy is welcomed, and I hope that these recommendations can assist with its further strengthening and development. The final policy must address why and how substantive changes can be made – to address our major challenges, to improve people's health and wellbeing in urban environments, and to serve the particular needs of our nation's children.

Please contact me via email if you would like to discuss any of these suggestions.

Yours sincerely,

Peter Murray
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Sydney