31 July 2024

Mr Jim Betts
Secretary
Department of Infrastructure, Transport,
Regional Development, Communications and the Arts
Jim.betts@infrastructure.gov.au

Dear Mr Betts

Thank you for releasing the draft National Urban Policy (draft policy) for consultation. I recognise the agreement of the National Cabinet to work together on a coordinated approach to Australia's cities and regions and appreciate the opportunity to provide feedback on the draft policy and its proposed actions.

Queensland supports the broad goals and objectives of the policy as they are aligned with the *Homes for Queenslanders* plan released in February 2024, and our State Planning Policy, being the overarching policy document that helps guides land use planning in Queensland. The Queensland Government is committed to delivering more homes, faster and ensuring that new development provides a diverse range of housing types for its communities. The government is also committed to enhancing the sustainability, productivity, public and active transport provision, social cohesion, disaster resilience and climate action of our urban areas.

Notwithstanding, the government sees some opportunities to enhance the draft policy with the inclusion of some key policy areas, such as:
- the critical importance of a compact urban form should be elevated as core objective to achieve all other sustainability objectives including by:
  - embedding affordable living principles including greater emphasis on public and active transport provision due to its multipurpose benefits for better environmental, social and economic outcomes
  - articulate the significant public savings in prioritising infill development on underutilised land with access to existing services and infrastructure
  - draw closer links to the 'well-located' criteria that states and territories are working towards under the Housing Accord
- placemaking should be further recognised as critical considerations for creating places and spaces that people value and that promote health and wellbeing
- the need to incentivise innovative approaches to policy development through pilot projects and funding arrangements.

Critically, can I request more clarity and transparency on how the Australian Government would use the draft policy when making policy or investment decisions, how progress against the objectives would be measured over time, and how further engagement with states and territories would be undertaken in its finalisation.
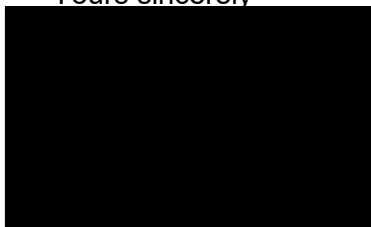
Further, it is requested that any actions proposed for the final policy remain aspirational and avoid any misconception of state support prior to states and territories undertaking detailed assessment and consideration.

The proposed actions come with increased workloads, resourcing needs, additional reporting and monitoring requirements. We need to ensure we are clear on the priorities and ensure focused effort is placed by all levels of government in the same direction. Careful consideration and clear prioritisation must be given to any new actions to support the policy as there are already multiple action plans relating to national planning reform.

I look forward to continuing to work together to deliver a coordinated approach to urban areas and to finalise the National Urban Policy. Enclosed with this letter is some more specific feedback on the draft policy for your consideration.

If you require further information or assistance in relation to this matter, Ms Tess Pickering, Deputy Director-General, Planning Group, Department of Housing, Local Government, Planning and Public Works can be contacted on (07) 3452 7909 or by email at tess.pickering@dsdilgp.qld.gov.au.

Yours sincerely

Mark Cridland
Director-General

Encl.

Attachment 1 – Specific feedback on draft National Urban Policy

Detailed comments for consideration		
Page/s	**Heading**	**Comments** *Note:* proposed ~~deletions~~ <u>additions</u>
4	*State of the Cities snapshot*	States that 51.6% of First Nations people in Australia live in the 20 largest cities. Is there value in in including a comparative percentage of overall population of Australia that lives in the 20 largest cities.
4	*State of the Cities snapshot*	Note it is worth acknowledging building approvals in 2020 were also impacted by the Australian Government's Home Builder program. This may not be considered a 'typical' year to use as base for comparing building approvals data.
4	*State of the Cities snapshot*	Is there more recent data than 2021 for rental and mortgage expenditure? Please clarify if this is limited to urban areas or national data?
5	*State of the Cities snapshot*	Under 'Cultural attendance' notes this would also affect/impact sports infrastructure and therefore could be misleading (as it does not reflect the current (post-Covid) attendance / venue usage). Can this be updated with more current/relevant data and/or trends.
5	*State of the Cities snapshot*	The snapshot does not include information relating to persons with disabilities. Accessibility and accessibility features are key elements of delivering diverse housing that is inclusive of people with disability and contributes to their social and economic participation. Consideration of utilising recent data released by the ABS from the Survey of Disability, Ageing and Carers.
6	*NUP Infographic Our urban areas are safe*	Please clarify what dot point 4 'resilience' refers to (e.g. in relation to climate change, natural disasters) as noted later in document.
6	*NUP Infographic Our urban environments and communities promote health and wellbeing*	An additional dot point can be added to say: <u>Access to clean, safe, reliable drinking water</u>.
6	*NUP Infographic Our urban areas promote productivity*	Should the dot point 'income inequality' be 'income equality'?
9	Purpose	The term 'sustainable' is not defined specifically to mean environmental sustainability although it is clear it is intended as such. The United Nations' definition of sustainability is *"meeting the needs of the present without compromising the ability of future generations to meet their own needs"*.

Detailed comments for consideration

Page/s	Heading	Comments *Note:* proposed ~~deletions~~ <u>additions</u>
		Consider inclusion of 'environmental' and/or 'environmentally' prior to 'sustainability' and/or 'sustainable' to ensure alignment of the National Urban Policy with the United Nations Sustainable Development Goals.
14	Urban roles and responsibilities	The responsibilities of the State and Territories and local government should also reference the management of and recovery from disaster events.
14	*State and territory governments*	We also request that the section on state and territory government responsibilities acknowledge the leading role that states and territories play in the provision of housing and related services – including the funding and delivery of social and affordable housing, private rental assistance and homelessness services.
15	*Local governments*	This section would benefit from a note regarding the difference of Aboriginal and Torres Strait Islander Local Councils <u>that</u> do not have a rates base and have a different role to other regional, shire and local councils. These differences contextualised in their history of being located on DOGIT / Mission / Reserve lands have an impact on their operations today.
17/18	*Equitable*	Consideration be given to including culturally and linguistically diverse communities as one of the cohorts in the final draft dot point under the Equitable heading which refers to the provision of target services.
19	*Resilient*	The dot points under 'factors that can determine our resilience' could also reflect factors that promote economic resilience and wellbeing – e.g. access to employment opportunities. The draft dot points have a strong environment focus and are light on social and economic factors, although there are interdependencies.
21	Objective 1 No-one and no place left behind	Need to also consider the cost of delivering services and ultimately how these could impact on housing affordability.
21	Objective 1: No-one and no place left behind	Recommend the following amendment: "Addressing these problems requires initiatives to increase housing supply, improve access to housing that is affordable <u>as well as access to well-located jobs and employment</u>, and invest in <u>well planned</u> transport and social infrastructure."
21	Objective 2: All people belong and are welcome	The description of this objective does not articulate the desired outcome. Also note arts and culture do not only occur in facilities, but in the wider community (e.g. public art and placemaking). Suggest adapting the statement under 'All people belong and are welcome' (p.25) to improve the narrative and content of this section.

Detailed comments for consideration

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21	Objective 3: Our urban areas are safe	Need to consider impact of natural disasters more broadly, such as cyclone and bush fire risks and role of appropriate building codes.
21	Objective 4: Our urban areas are sustainable	Need to clarify that net zero emissions is a national whole of economy target, and not explicitly for individual cities. The current wording implies cities have a net zero emissions by 2050 target. Further, consideration needs to be given to the cost of transitioning to circular economy for various cities. Suggest including the word 'cost effective transition'.
21	Objective 6: Our urban areas promote productivity	Need to recognise the shift towards a blended work arrangement where individuals working from home are less dependent on public transport or physical mobility to take jobs or connect to services digitally.
22	*No-one and no place left behind: Discussion*	Request that people with disability be specifically mentioned in the discussion on homelessness in the Draft Policy, noting the Disability Royal Commission's recommendation is that people with disability be prioritised in national homelessness approaches.
22-23	Discussion	Recommends the following amendment: "Housing should be in close proximity to ~~where~~ employment opportunities ~~are~~ <u>and</u> located~~, as well as close~~ to transport and other services, <u>particularly active and public transport to optimise community health and wellbeing. Housing needs to be proximal to social infrastructure, adequate green and blue spaces to ensure community wellbeing</u>. Housing also needs to be located in areas that do not face a high risk of natural hazards, or where development is predicated on design and investment which reduces disaster risk, informed by future climate scenarios."
24	*No-one and no place left behind: Possible actions*	Invest in supporting infrastructure. Add a dot point under this section – <u>essential utilities such as electricity and water and sewage</u>.
24	*No-one and no place left behind : Possible actions*	'Incentives for private rental developments, particularly in the inner and middle rings of cities' – need to include appropriate caveat that states are not committing to additional support through this process. Queensland has a build to rent tax concession scheme in place.
26 - 27	*All people belong and are welcome*	Suggest the discussion on sport include reference to sport's benefits for <u>mental</u> as well as physical health. In addition, suggest this section highlight the importance of ensuring investment in sporting facilities that are accessible, as access and cost often present barriers to participation. Suggest a possible new action as follows: • <u>Work with states and territories to better demonstrate and communicate to communities the benefits of investing in sport and cultural infrastructure.</u>

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		This action is suggested due to potential challenges in achieving community support for investments in sporting infrastructure, particularly for stadiums.
30	*Our urban areas are safe*	Recommend edit to "implement measures to mitigate the impacts of rising sea levels, coastal erosion, flooding, bushfire and heat hazards in our planning and infrastructure frameworks" dot point. Suggest include reference to climate change and mechanism '<u>such as through</u> green infrastructure <u>such as shading</u>'.
31 - 32	*Our urban areas are sustainable*	The policy identifies transport as a major emitter, and issue to be addressed. The policy should also consider travel *between* urban centres and its related emissions – many workers commute from major centre to major centre as affordability worsens in capital cities and people are forced to move further out.
31-32	*Our urban areas are sustainable*	There is a lot of talk about circular economy and improving energy efficiency. This could also include improving water efficiency.
32	*Our urban areas are sustainable*	The importance of green and blue spaces on page 32 could also reference their benefits for population mental health and wellbeing.
34-35	Our urban environments and communities promote health and wellbeing	Recommend expanding this section to include/consider: • placemaking, urban design and value of places • utilising social infrastructure amenities (e.g. sporting fields) to maximise the use of these spaces for community activity, health and wellbeing in denser urban spaces.
34-35	Our urban environments and communities promote health and wellbeing	The strong emphasis on public and active transport in the draft policy is particularly welcome. Suggest the draft policy include a broader recognition of the importance of creating environments conducive to physical activity (which is an overarching concept that includes sport, active transport and other forms of movement throughout people's day). This could be included within the discussion on pages 34-35. An increase in Australians' physical activity is vital for maintaining a healthy weight, preventing and managing chronic illness, improving mental health outcomes, and to meet the targets set in the *National Preventive Health Strategy 2021–2030*, which includes a 15 per cent relative reduction in the global prevalence of physical inactivity in adults and in adolescents by 2030. Evidence shows when access to physical activity opportunities is convenient, affordable and safe, people are more likely to be active in their everyday lives.
36	Key urban challenges	Recommend the inclusion of "<u>A projected shortfall of industrial land in some regions and developing connecting/enabling infrastructure</u>" as a challenge.

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38	Possible actions	Recommend the following amendment: "improve strategic planning at all levels and consultation between governments and industry to ensure better coordination between freight infrastructure and networks, <u>industrial</u> land use planning <u>(including improved government collaboration in facilitating infrastructure development to underpin industrial land use)</u> and urban development.
40	*Appendix A*	Appendix A (from page 40) would benefit from principles reflecting gender, culture and intersectionality.
52	*Our urban areas are sustainable*	• Under Appendix B: 'National Initiatives Underway' (p52): • Query if 'National Construction Code – proposed changes' could be updated to reflect outcomes from the Building Ministers Meeting <u>June 2024 Communiqué</u>: ▪ Agreement on voluntary pathway in NCC 2025 for commercial buildings to measure and report on embodied carbon. ▪ Agreement that climate resilience be a specific objective of the Australian Building Codes Board from 2025, giving mandate for consideration in future NCC. • Query if 'Under consideration by Building Ministers in 2023-24' is to be updated to '2024-25' to reflect ongoing consultation in 2024?
54	*Appendix B Objective 6: Our urban areas promote productivity*	The row on Closing the Gap refers to Target 7 incorrectly as an outcome. 'By 2031, increase the proportion of Aboriginal and Torres Strait Islander youth (15-24 years) who are in employment, education or training to 67%. This should be amended to read Target 7 rather than outcome.
54	*Appendix B*	The NUP could be clearer in how it supports the National Agreement on Closing the Gap (CtG) and clearly detail which targets the policy supports, specifically the following CtG targets be noted within the document: • Page 46, 48, 49 – CtG boxes include 'Target 1 – Close the gap in life expectancy within a generation, by 2031'. Improving nationally, but not on track to be met. • Page 46 and 49 – CtG boxes – include 'Target 9A – By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88 per cent, and 9B By 2031, all Aboriginal and Torres Strait Islander households: i) within discrete Aboriginal or Torres Strait Islander communities receive essential services that meet or exceed the relevant jurisdictional standard, ii) in or near to a

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		town receive essential services that meet or exceed the same standard as applies generally within the town (including if the household might be classified for other purposes as a part of a discrete settlement such as a "town camp" or "town based reserve"). Improving nationally, but not on track to be met. • Page 46 and 49 – CtG boxes – include 'Target 6 – By 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25–34 years who have completed a tertiary qualification (Certificate III and above) to 70%'. Improving nationally, but not on track to be met. • Page 49 – CtG box – include 'Target 10 – By 2031, reduce the rate of Aboriginal and Torres Strait Islander adults held in incarceration by at least 15%'. Worsening nationally. 'Target 11 - By 2031, reduce the rate of Aboriginal and Torres Strait Islander young people (10–17 years) in detention by at least 30%'. No change nationally. • Page 48 – CtG box – include reference to 'Target 16 - By 2031, there is a sustained increase in number and strength of Aboriginal and Torres Strait Islander languages being spoken.' No assessment available but baseline data available. • Page 54 – CtG box – include 'Target 6 - By 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25–34 years who have completed a tertiary qualification (Certificate III and above) to 70%'. Improving nationally, but not on track to be met. 'Target 8 – Bv 2031, increase the proportion of Aboriginal and Torres Strait Islander people aged 25-64 who are employed to 62 per cent. Good improvement and on target to be met. 'Target 17 - By 2026, Aboriginal and Torres Strait Islander people have equal levels of digital inclusion'. No assessment available but baseline data available.
Various	Appendix B: National Initiatives Underway"	Note that measures under "Appendix B: National Initiatives Underway" may no longer be current. For example, the Energy Price Relief Plan has evolved since its original endorsement by National Cabinet in late-2022 (e.g. coal price caps concluded on 30 June 2024).
	Appendix B: National Initiatives Underway"	Suggest the National Urban Policy could acknowledge relevant activities and deliverables being driven at a national level, such as the Australia-New Zealand Emergency Management Committee (ANZEMC) 2024 Work Plan. For example, Deliverable 2.1: By 2028, develop a nationwide position on the critical resilience and risk reduction considerations that should be incorporated into planning and building decisions from a natural hazards perspective, including a working definition of resilience, to inform the Australian Building Codes Board 2028 update to the National Construction Code. For Example:

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		○ The <u>Disaster Recovery Funding Arrangements</u> 2018 (DRFA) is the means through which the Australian Government provides funding to states and territories to share the financial burden of responding to and recovering from natural disasters, and supports the provision of urgent financial assistance to disaster affected communities. ○ <u>Resilient Homes Fund</u> - is jointly funded (50:50) by the Queensland and Australian Governments under Category D of the DRFA to assist eligible flood-impacted homeowners to repair (enhancing resilience), retrofit, raise or demolish and rebuild or relocate flood-affected homes. This includes the <u>Voluntary Home Buy-Back program</u> which was available for the most severely impacted homes and those at the greatest risk of future flooding. The NSW equivalent of this is the <u>Resilient Homes Program</u>, and its Home Buyback and Home Relocation programs. ○ <u>Disaster Ready Fund</u> (DRF) - The Australian Government's flagship disaster risk reduction initiative which will fund a diverse set of projects in partnership with states and territories to deliver medium-term and long-term national outcomes, investing up to $1 billion over the next five years.