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## Submission on Draft National Urban Policy

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I am Professor of City Planning and an Associate Director of City Futures Research Centre in the Faculty of Arts, Design and Architecture, UNSW Sydney. I was Program Director for the UNSW Planning Program 2013-2017 and 2021-2023, and hold primary teaching responsibilities in strategic planning in the School of Built Environment. I have undertaken research, and published widely, on matters related to metropolitan planning, housing market dynamics, incremental forms of urban renewal, and suburban regeneration. I welcome this opportunity to provide comment and offer observations on the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' draft National Urban Policy.

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Urban policy traditionally struggles to negotiate the gulf between the aspiration captured in its visions, and the complexity inherent in its delivery on the ground. We are good at writing compelling goals and objectives, but frequently fall far short when it comes to implementing those plans or evaluating whether they have the impact intended. We are also well versed in what sustainable urban growth, best practice design and built form, and quality of urban life looks like, but the barriers and challenges in delivering those outcomes are all-too-often weighed down by a myriad funding, governance and political factors. Urban policy interventions often involve considerable expenditure commitments and take a lot of time: two things that our short political cycles do not easily accommodate.

The draft National Urban Policy acts as an important guiding document in terms of providing a 'line of sight' for national policies and priorities through an urban lens, mapping necessary synergies and coordination across different tiers of government, and a framework for interjurisdictional working groups. The principles outlined, and the goals and objectives which follow from those principles, are hard to argue with. Collectively, they offer a sound, aspirational wish list to guiding urban thinking over the next 30-50 years, capturing both the urgency of current heightened concerns including housing supply and affordability, but also signalling significant structural challenges – notably transitioning to net zero – that will increasingly underpin urban thinking moving forward.

However, given its inclusive breadth, the opportunity for a more focused justification and articulation of Australian Government involvement in urban policy issues from a national perspective gets a little lost. Furthermore, it does not really provide the 'plan of settlement' inferred in its initial aspirations: what should be the most spatially informed and literate of all public policy – urban policy – is engaged with, and outlined, in broadly aspatial terms. Although the importance of 'place' is clearly adopted throughout, this should not be conflated with the scalar, spatial and territorial considerations that would underpin a more proactive role for the Commonwealth in a national urban policy.

In that spirit, this submission makes the case for a national urban policy that extends its ambition beyond acting as a vision and 'urban lens' framework for government policy and recognises the centrality of cities and regional cities to Australian Government interests. This is not to advocate for a national urban policy to stretch itself into a detailed delivery and implementation proposition focused on process, but rather to focus in on the levers that Canberra can pull at the national level to catalyse a step change and building capabilities and involvement where required. In support of this call, a set of observations in relation to the draft National Urban Policy's remit, strengths and potential limitations are unpacked below:

1. The need for a clearer understanding of what a national urban policy is for.
2. A national urban policy should engage with spatial connectivity and relationships between city-regions, regional cities and towns, and 'nation-building' infrastructure.
3. A need to accommodate and respond to the different spatial and contextual imperatives defining our cities, suburbs, towns and regions
4. An opportunity to provide a more meaningful commitment to strategic planning, and support for mechanisms required to negotiate and deliver those plans.
5. The need for a framework which is resilient and to social, economic and environmental shifts, including the lifecycles of buildings, suburbs and cities

## 1. A clearer understanding and statement of what a *national* urban policy is for

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Torn between the urgency of providing solutions to problems that often become suddenly visible and explosive, despite being structural and omnipresent, and the wider need for reforms that are able to tackle more structurally the failures of public action, the ultimate design and purpose of national urban policies is an open question (Zimmermann and Fedeli, 2021, 331)

...Australia has sustained more than a decade of urban policy at the national level. Though the substance of policy remains inadequate to the needs of an urban nation, this change is an important shift in the history of the federation (Dodson, 2024, 56)

Many countries have a national urban policy; however, their remit and reach vary greatly. At their most comprehensive, they may act as an overarching spatial or territorial strategy, guiding population and economic growth, related infrastructure expenditure, and coordination of public policy at the national level. More commonly – and particularly so in federated constitutions such as Australia – that degree of centralised direction is less well-formed.

Notwithstanding Dodson's observation of more sustained interest by the Commonwealth in recent years, constitutional constraints have limited that engagement in national urban matters more to a 'prod and nudge' rather than leadership and direction. This is seen for example through the steer of Productivity Commission reports, intergovernmental/COAG arrangements, and seeking commitment from states and territories to contribute 'their share' to national targets – notably around housing supply and affordability as seen in the current National Housing Accord. And while those mechanisms are not insignificant, they essentially remain tied to, and act to reproduce, existing urban dynamics and outcomes. As such, the relationship between Canberra and the states and territories has essentially positioned urban policy as an integrating lens across the extensive gamut of policymaking impacting on urban areas: a mechanism to provide a line of sight to key national level plans, and a coordination tool across a range of policy portfolios. The relationship can be considered largely contributory and transactional, in the form of targeted funding contributions, 'deals' and 'compacts' with city-focused initiatives, rather than strategic. Although framed ambitiously, the draft National Urban Policy arguably continues this pragmatic tradition.

Commonwealth policy objectives, expenditure, public acceptance and evaluation reach into all aspects of our lives – and into our homes, neighbourhoods and cities. The draft policy captures this remit in its overarching principles and goals, and the framing of those goals (liveable, equitable, productive, sustainable resilient) aligns with much of the terminology well-versed in current strategic planning and urban debate. There is a welcome emphasis on and acknowledgement of First Nations perspectives and interests, transitions towards decarbonisation, net zero, and climate change adaptation, and equity considerations related to both people and place.

The breadth of issues raised is understandable, although tends to limit the draft policy to rather generic statements and reaffirms what we know to be a longstanding deficit in urban policy making: easy to say what we would like to see, but a reluctance to unpack and engage with the difficulties inherent in translating those policies into practice. Simply put, 'doing' urban policy is hard and contested work. A national urban policy presents an opportunity to have a more honest conversation of the trade-offs, costs and challenges which accompany the route map to its guiding aims and vision. A national urban policy can help bridge that policy-practice gap to some extent through concentrating on where Canberra can make a difference and where the Commonwealth has the resources, levers and responsibility to assist the states and territories take transformative action. What are the issues where Australian Government involvement provides the most additionality?

Providing a detailed 'how to' implementation framework is not the role of a national urban policy. However, in order to move beyond the motherhood statements there is a need to more objectively unpack questions of governance, financing and delivery. Although such matters inevitably largely fall upon state and local governments, it is fair to ask when setting those aspirations: 'what are the responsibilities, settings and levers at the national level that can help better facilitate/avoid hindering the ability of those goals to be met on the ground?'

Honing-in on the crucial levers that will shape Australia's urban transitions where a line of sight with national policy is most pressing, substantive and dependent would provide a more focused set of goals and objectives to a national urban policy. This suggests a deepened emphasis on those fundamental policy imperatives shaping cities dependent upon national as well as other scales of governance: social and affordable housing, equity and inclusion, productivity, and climate and net zero transitions. This is not to signal lesser importance to the extensive consideration given to, for example, cultural facilities or urban design imperatives, but rather suggest that engagement at the national level might be secondary to state and local policy strategies and directions in those spheres.

## **2. A national urban policy should engage with spatial connectivity and relationships between city-regions, regional cities and towns, and 'nation-building' infrastructure**

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What is particularly striking is that state actors still seem to look at cities through the lens of instruments and discourses of state modernization (fiscal federalism, decentralization, deal-making, managerialism) but are not able to grasp cities as socio-spatial configurations of actors, milieux, territories and the relationships between them (Zimmermann and Fedeli, 2021, 326)

What should constitute a *national*, as opposed to overarching generic, vision for Australia's urban futures? Do we need to talk about the relationship between, for example, Sydney, Melbourne and Brisbane? look at the spatial dimensions of long-term interstate movement and migration patterns? urban networks and forms of connectivity which will better serve wider societal goals for Australia over the next 50 years? Since the New Cities Program in the early 1970s of the Whitlam Government, we have not seen meaningful national engagement with the spatial distribution of Australian settlement, or the balance between cities and regions in managing growth and guiding economic development, including proposals for decentralisation.

This is not to pit prospective 'winners' against 'losers' in accommodating growth, but to consider how to better coordinate wider objectives, and think about the relationship between cities, regional towns and beyond. At present we have a national urban structure which encourages primacy around the eight capital cities in each of the states and territories. While this has produced many social and economic outcomes which are positive and indeed enviable in international comparison studies of liveability, it has also engendered constraints across all five of the draft policy's 'what we want our cities to be' goals.

Do these existing settings provide the most effective response to current urban challenges, let alone those that will need to continue to adapt to shifting and evolving global trends and drivers? In responding to forward looking goals and objectives, do we need a different approach that moves away from concentration and more deliberately supports growth in secondary and regional centres? Do we need to be building new cities, or more distributed urban networks, which capture and counter the needs/demands of growth which have both benefitted but also placed great strains on our major urban areas?

This submission does not advocate for a full nationwide spatial or territorial strategy for urban and regional Australia. Beyond the political minefield such a strategy would entail, pragmatism dictates that there is neither broader public support nor willingness to support the step-change in infrastructure expenditure needed for more transformative policy intervention at the current time: the prospects for a Department of Urban and Regional Development (DURD) 2.0 are thin.

However, the Australian Government clearly has sufficient skin in the game to have a wider strategic interest in those broader, state- and city-region-spanning considerations, and to engage more progressively with these bigger spatial and connectivity questions. This extends far beyond a place-based interest defined through current Commonwealth initiatives (the *Urban Precincts and Partnerships Program*, the *Thriving Suburbs Program*, and *City and Regional Deals*) to a strategic, spatial appreciation of urban and regional systems across the country, and how those dynamics are shifting and evolving over time. The draft National Urban Policy highlights synergies and integration with the Regional Investment Framework, but arguably a more structured, spatially informed relationship, is required here.

- Does the Australian Government have a strategic position on the roles of capital cities, suburban hinterlands, regional cities and smaller centres in accommodating nationwide growth in sustainable, equitable and efficient ways?
- Are we looking to understand, influence and sustain current Australian settlement patterns, or position the Commonwealth's role in helping transition those dynamics to best meet changing social, economic, environment, climate resilience and national security imperatives?
- What priority is placed on intra- city-/city-region connectivity, on links between major cities and their surrounding urban networks, and connectivity between major cities? How do those prioritisations reflect broader economic and nation-building opportunities and attendant policies?

If Canberra is interested in high-speed rail, climate change adaptation and mitigation, regional economic development, addressing regional inequities, and the impacts of interstate mobility and household movement (which it is), then it is entitled to contribute a national perspective to those discussions and their spatial policy implications. An Australian National Urban Policy has licence to engage with the spatial and scalar dimensions of the key principles, goals and objectives which guide it.

### **3. An encompassing national urban policy can and should accommodate and respond to the different spatial and contextual imperatives defining our cities, suburbs, towns and regions**

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In bridging the gap between generic, motherhood statements and enactment of those policies on the ground, a national urban policy should support and underpin implementation frameworks that acknowledge that different priorities, approaches and solutions will be required in different urban contexts. Many of the challenges and opportunities our urban environments and communities face in the coming decades, and recognised in the draft National Urban Policy, are universal. There are a set of foundational principles that can be shared, and likewise the desired outcomes, in those fundamental terms can be shared. But the policies and processes that translate those policies in order to achieve those outcomes need to be flexible and reflect spatial context.

For example, our central city, suburban and regional localities are not all at the same starting point in the journey towards net zero: neighbourhood retrofit initiatives will look different in Bondi, Bankstown and Bathurst. Transport mode share transitions will likewise look different, present different challenges and opportunities. In the central city, it may be all about restricting car parking, bike lanes and active transport. In the outer suburbs it may be more about EV infrastructure and hub and spoke remodelling of transport routes and facilitating mode shift.

A national urban policy, by definition, needs to be all encompassing, but it needs to signal that detailed policy and programs are necessarily spatially nimble and responsive. Cities, suburbs and regional towns can share overarching urban principles and objectives and have similar shared outcomes – but we need to have the confidence, and the resources, to recognise that different initiatives and different delivery models need to be encouraged and supported.

### **4. A national urban policy presents an opportunity to offer more meaningful commitment to strategic planning, and support for mechanisms required to deliver those plans.**

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The draft policy gives considerable mention to the importance of strategic planning, although relegates its most compelling support for its role in enabling effective urban policy to the appendices (Appendix A, principles). Under Principle 1, clear recognition is given to the need for city planning and governance to be collaborative and proactive, and that there should be 'a shared government vision for sustainable growth, informed by local communities and delivered with all levels of government' (p. 40). This is further supported through a set of progressive and ambitious claims tied to its remit in relation to compact city prioritisation, taking a place-based and co-created approach, and prioritising housing affordability, social equity, circular economy transitions and sustainability. There is acknowledgment that 'we cannot achieve sustainable urban development through business-as-usual approaches' and that 'we need transformational change' (ibid.).

Strategic planning – and, crucially, strategic planning which is supported, appropriately resourced and valued – is the vital translation tool that all levels of government have in order to bring about the inclusive, balanced and deliverable transformative change called for above. The key imperatives driving the *National Planning Reform Blueprint* in relation to zoning, land release and 'other measures to improve housing supply' are critical and front-of-mind, but risks

reinforcing the limitations of political expediency which tends to guide and shape discourses around planning, the planning system and what it is there to do, and not do.

The value of strategic planning is easy to voice, as here in the draft policy. But, by nature, strategic plans are long-term, are looking to juggle complex issues, and seek to do so in ways which take communities and stakeholders with them. It provides the vehicle for evolving 'business-as-usual' approaches in a sustainable way, and a lever for enabling 'transformational change'. Yet in more short- and mid-term cycles, strategic planning (and planning more generally) becomes an easy target of blame. A housing crisis becomes a crisis in supply, which becomes a crisis in planning, rather than a more balanced conversation about affordability, supply and demand, development viability and the market. We continue to lack holistic engagement with the structural challenges expressed through our land policy and housing systems, and mature discussion on what needs to change.

We also too often see commitment to strategic planning wane when powerful lobby pressures mount. In NSW, for example, the strategic planning trajectory of Greater Sydney (and more recently the greater city-region) of the last 8 years led by the Greater Sydney/Cities Commission appears to have been summarily demoted – with some urgency – last year and usurped by an advocacy coalition of interests headed by the NSW Productivity Commission and Urban Taskforce. While the new NSW Government has rapidly pushed through significant planning reforms to address the housing crisis, there is little sign (as at late June 2024) of a refreshed metropolitan/strategic plan for the city-region which should have been delivered by end 2023.

Said reforms – including the Transport Oriented Development (TOD) Program – need to be grounded, evidenced and understood in the context of their strategic planning context. In a vacuum, and without the mechanisms avoided by strategic planning to negotiate neighbourhood change with communities and stakeholders, we may see an uptick in supply numbers (the market, development feasibilities and land assembly willing), but it is rather less clear whether the processes involved in stewarding those changes have been fully 'priced in' and all dimensions of desired outcomes given the appropriate weight. The mechanisms providing a line of sight for national interests to manifest in what gets delivered on the ground also become less transparent.

Data and evidence which unpacks the complexity of delivering urban policies (the process) should inform design and development of those policy frameworks as much as (taking TODs as an example) modelling exercises of possible supply increases resulting from upzoning (the desired policy outcome). City Futures Research Centre here at UNSW has recently completed a 3-year ARC-funded project exploring the drivers, issues, and challenges tied to collective sales activity – where neighbours cooperate to sell their properties together, assisting land assembly – in Sydney (and an international comparator city, Vancouver). This analysis highlights the often long and contorted journeys that underpin processes of neighbourhood change: renewal is an intensely peopled-process, and simply drawing a circle around a metro station and upzoning the land does not immediately translate into an idealised high-density district.

As such, the narrative around the importance of strategic planning in the draft policy is welcomed, but there is a need for the Australian Government to follow that narrative through by demonstrating that it understands the value and role of planning beyond it being something that can be deemed problematic and kicked about when politically expedient. So yes! to planning reform, but reform in order to provide the transformative change called for and act as the key lever to enable all aspects of a national urban policy, rather than for headlines suggesting 'cutting red tape' is the magic wand to addressing housing supply and affordability concerns.

## **5. A national urban policy should provide a framework which is adaptive and resilient to social, economic and environmental shifts, including the life cycle of buildings, suburbs and cities**

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The draft National Urban Policy outlines important commitments to sustainability and environmental imperatives, and a framework within which national policies such as net zero can be linked. Important signals are also provided in terms of encouraging a shift towards a more circular economy. These transitions have scalar and spatial implications and will demand an evolving set of built form and planning guidelines – for example at the subregional and neighbourhood scale ensuring provision of last mile delivery infrastructure, local waste and energy hubs, and rightful urban space allocation to active transport uses. It is also important that policy settings help guide decisions regarding compact city development and the construction of high density-built form.

Cities which have a much longer trajectory of densification, such as Hong Kong, are now facing the contemporary challenge duality of ageing dwelling stock/ageing population, and the renewal tool kit and feasibilities for inherently complex structures cannot always turn to even further upzoning as a solution. The strong support given to the compact

city in the draft policy is supported, but that steer needs to ensure that we know what we are building – not only to avoid the myriad defects which often become apparent in the short term and have led to dented purchaser confidence, but to design and build knowing that major adaptation, renewal and refit will be required as with all buildings down the track.

Urban policy settings put in place today thus need to take a life-cycle perspective regarding their impact on future generations of urban residents and indeed for policymakers tasked with addressing the challenges of their age in 30-50 years' time. This places an emphasis on moving towards a more holistic understanding of building lifecycles, embedded carbon, the recyclability of materials, the capacity and feasibility for retrofitting, and so forth. Our current expression of urban intensification in Australia's major cities – up to 30-40 storey towers, concrete and steel construction, requiring significant building infrastructure and services, will – while bright and shiny now – inevitably need major rounds of maintenance, renewal and ultimately redevelopment in the decades to come.

The need for forward awareness and commensurate policy interest extends to the legal and governance structures which accompany the compact city. While we typically focus on the built form, sustainability, equity and affordability arguments given in support of compact city form, a fundamental element of high-density living remains essentially silent in debates about the future of Australian cities. That future is, in ever greater proportion of our total residential stock, a strata future. The joys and tribulations of strata ownership typically become fully apparent over time, particularly so when they intersect with the challenges tied to life-cycle management and maintenance of apartment buildings. Strata title raises a wealth of questions tied to property rights and negotiation of those rights as an amalgam of individual and shared property interests. As research over the last decade by City Futures Research Centre has evidenced, the intersect between strata renewal and compact city redevelopment sees the collision of property, planning and practical logics played out at the micro-scale of building governance.

Put more simply, we are building-in more complex legal, governance and financial straightjackets with our preferred residential typologies: we are making home ownership more fraught, and our ability to deal with issues that will inevitably have to be dealt with in the coming decades, all the harder. This is not to argue against compactness, or strata, but we need to acknowledge the hard work ahead, and for policy to be thinking now what we'll need to do, and how we'll do it.

## Endnote

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A National Urban Policy is something to be supported. Even if – ultimately – it acts as little more than an aspirational statement demonstrating acknowledgement and interest in the importance of cities and all urban settlement at the Commonwealth level, that is better than simple disengagement accompanied by a policy vacuum. However, the *national* of a National Urban Policy needs to be more clearly articulated. This will help provide a more focused set of principles and goals guided by the key priorities for the Australian Government: those which are vital for negotiating national level outcomes in their urban contexts; those where the additionality provided by Canberra's involvement is transparent, demonstrable and comes with the necessary resourcing and capability; and those which allow full accountability.

Underpinning this nationwide remit, a vital task – and opportunity – for a National Urban Policy is engagement with the spatial imperatives that guide the drivers, challenges and outcomes of our cities and regions and the connectivity between them. Recognition of place, and the importance of place-based policy, is key, but this should not be conflated with an encompassing spatial policy. Constitutional responsibilities between states, territories and the Commonwealth make a national settlement strategy difficult, but the Australian Government has clear interest in understanding the dynamics, connections and synergies between and across our urban systems and how they will adapt, respond and thrive in the face of known and emerging social, economic and environmental imperatives. The National Urban Policy should provide Canberra with a greater voice in that discussion.

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