



## Submission to the National Urban Policy consultation

[Sweltering Cities](#) is a Non-Profit Organisation that works directly with communities in hot suburbs and homes to advocate and campaign for more liveable, equitable and sustainable cities. Our work is at the intersection of health, inequality and climate. We are a registered health-promotion charity with the ACNC and have been working in Victoria since 2020.

Extreme heat is a public health crisis. According to the Australian Institute of Health and Welfare, heatwaves are Australia's most deadly environmental disaster. Climate change is leading to longer, hotter summers and more frequent, deadly heat waves, with devastating consequences for the health and wellbeing of our community. It is clear that we need urgent action to address the impacts of extreme heat and to create more resilient communities that can withstand the challenges of a changing climate.

Strengthening resilience to climate disasters requires leadership from all levels of government, including how we plan our cities, homes, transport and healthcare. Cities face growing vulnerability to extreme heat impacts, influenced by urban design and planning. Vulnerabilities range from health risks and infrastructure strain to impacts on energy and agriculture. Integrating heat resilience into urban planning is crucial, involving strategies including green and blue infrastructure, thermally efficient buildings, cool roofs, shaded paths, and accessible public transport.

We acknowledge the National Urban Policy as the key framework to drive the goals for creating sustainable, liveable, and equitable cities resilient to future stressors. We welcome the opportunity to comment and are pleased to see that information about the challenges and opportunities is detailed and backed by data on chronic stressors, reflecting how cities are changing in social, economic, cultural, and environmental ways. We also welcome the emphasis on inclusivity and fairness, especially in relation to marginalised communities, multicultural populations, and disadvantaged groups. We must recognise the crucial role these communities play and their unique knowledge in creating cities that are resilient, fair, and sustainable.

Over the past 4 years Sweltering Cities have worked collaboratively with community, leading research centres, industry experts, and policy makers on identifying what matters to the community and what changes they are looking for to achieve more liveable, sustainable, and equitable homes and cities.

When considering the Policy, we have used the following principles to guide our response:

1. Placing equitability, resilience, and liveability firmly alongside other planning objectives like sustainability, productivity, and safety.



2. Invest in systems, standards, processes and capacity building today for a resilient and sustainable tomorrow;
3. Acknowledge the challenges and leverage the collective advantages resulting from the intersections among various sectors, disciplines, and governmental levels of cities;
4. Working for and with communities that are disproportionately affected by the effects of climate change to help them adapt and rise above social inequalities and climate injustice ensuring no one is left behind;
5. Through this process building strong partnerships with them, building their capacities and capabilities to drive locally-led impacts and create community-centric cities;
6. Supporting transformative and innovative ways to achieve these goals acknowledging that urban spaces are complex, cross-sectoral systems that require fresh ways of thinking about their problems and solutions.

## Recommendations:

### **Provide Implementation Pathways and a Clear Action Plan**

While the policy outlines clear objectives backed by evidence, it lacks specific plans for achieving them. Given the complexity of cities involving different systems, stakeholders, and levels of government, coordinated actions are crucial.

Clear and strategic roadmaps are needed to translate policy goals into actionable steps, with defined procedures, responsibilities, measurable targets, and flexible timelines. These roadmaps should be adaptable and remain flexible documents. Additional detail may include:

- Guides for effective and strategic partnerships between the Commonwealth and other government levels, industry, community, and businesses. This will build on the strengths of existing partnerships to better involve states and territories. It aims to make them more responsible, utilising their specific skills and avoiding duplication of efforts, such as community programs that can be managed more effectively at local government levels. Where possible the Policy should address the ongoing issue of shifting responsibilities between state and local governments, ensuring that local governments and communities are not burdened with tasks beyond their capabilities or budgets. This is particularly important for managing extreme heat risk and climate adaptation, where local government is currently tackling many of the urgent challenges without sufficient support from state or federal agencies or funding.
- Measurable indicators for land use, active and public transport, housing developments, and social infrastructure. There will be both quantitative and qualitative indicators and their benchmarks drawn from successful case studies. These indicators should reflect a comprehensive view of systems-thinking and may include the following:



- a. Cross-sectoral indicators to better capture the interconnectedness of different sectors and systems
  - b. People-centred indicators, like "quality of access," to measure factors such as access to transport, healthcare, and social infrastructure, focusing on how they enhance community resilience to heat and safety.
  - c. These indicators may be derived from reports like the State of the Cities, which is regularly updated and reviewed.
- It is important to recognise the importance of achieving short-term successes alongside long-term strategies. Quick wins for communities are not only cost-effective and achievable but also bring significant, measurable improvements over time while underpinning cross-sectoral goals of climate resilience, environmental sustainability, equity, and liveability. For instance, Sweltering Cities has been [advocating for shaded and accessible bus shelters](#) in the hottest suburbs of Sydney, where 70% of bus stops lack shelter or shade. Our Summer Surveys that reach thousands of respondents around the country consistently highlight accessible transport as a critical issue that requires real change, which is crucially tied to the liveability, sustainability, and equity of these suburbs.

### **Cross-sectoral dependencies and stronger links with other policy frameworks**

The Policy addresses numerous issues through its principles, goals, and objectives; however, it doesn't organise the interactions among various sectors, disciplines, and government levels that are the hallmark of creating urban spaces. Although it mentions connecting with other national agendas, we recommend stronger integration. For example, we would appreciate clarity on how the National Health and Climate Strategy, the National Adaptation Plan, and the National Climate Risk Assessment will relate to the National Urban Policy. Specifically considering how the National Health and Climate Strategy relates to the National Urban Policy will assist in planning cities and urban areas that support human health now and into the future.

### **Stronger policies around climate change adaptation, particularly extreme heat**

Extreme heat, as shown in the The State of the Cities indicators, caused 7,104 injuries and 293 deaths from 2012 to 2022. While the Policy emphasises the importance of incorporating disaster and climate risks into land use planning at a national level, we urge for minimum, mandatory requirements for climate adaptation and resilience to be put in place for significant projects.

Specifically, this means requiring a Climate Mitigation and Adaptation Plans for all new urban developments. This plan should identify medium and high-risk areas based on climate zones and propose design solutions to address these risks. We recommend plugging-in established



urban planning rating tools such as Green Star Communities, or the forthcoming tool Cool Suburbs within this requirement.

We recommend that the department prioritises heat safety when referring to safe urban spaces. This is crucial given the Policy's findings that certain groups such as First Nations people, individuals with disabilities, migrants, refugees, and the LGBTIQ+ community are disproportionately affected by heat-related risks. Ideally, the Policy would state explicitly that good urban policy promoting walkability, cyclability, equal access to quality greenspaces and social cohesion contributes significantly to reducing community heat-vulnerability and improving community resilience.

### **Prioritise funding for safe and accessible active and public transport**

Active and public transport are crucial for mitigating road emissions, supporting Australia's efforts of decarbonisation, and for making cities more liveable, equitable, and sustainable. They also ease traffic jams and can reduce living expenses, while promoting physical activity and overall health of communities.

To encourage more people to use active and public transport, we need safe, accessible, and well-connected infrastructure. This means shaded footpaths and sheltered bus stops, and good connections between different types of transport. [When we talk to people in our communities](#) about how to make their suburbs safer from heat, they often bring up the importance of active and public transport. Hence, we urge governments at all levels to work closely together to achieve these goals for the communities we serve.

### **Boost locally-led actions and development**

The Policy recognises the importance of partnership with First Nations, CALD and multicultural communities. To make this happen, the Policy can provide national guidelines to help prioritise community needs, like fair tree coverage, better thermal standards for social housing, and safe access to active and public transport with specific indicators and targets.

There is a need for investment in leadership and governance to engage, train and build capabilities in local communities enabling them to play a crucial role in shaping and executing the policy. Specifically, tailored programs should be developed to engage multicultural and culturally diverse communities who face more challenges from ongoing stresses and future disasters.

Considering that four capital cities have non-English speakers exceeding the national average of 23.5%, it's crucial to draw insights from diverse cultural backgrounds. This will help in creating cities that are fair and accessible to everyone. Currently, the reference list lacks diversity and doesn't adequately represent the rich cultural mix found in Australian cities.



## **Stronger policy to shift BAU and consider multiple avenues of innovation**

The policy needs to recognise that achieving sustainability, resilience, equitability, and creating cities that are both liveable and safe requires more than just focusing on urban infrastructure, land use, place-making, or transport alone. It should also set out goals and principles for other areas of innovation, such as technology, finance, digital transformation, institutions, governance, regulations, and pricing strategies.

Cities are complex systems with many interconnected parts, so it's necessary to approach them with new ideas that go beyond the usual way of doing things. Because every new technology can have unforeseen effects, it's also important to regularly assess and evaluate the consequences of each innovation. The State of the Cities reporting can be a useful framework for evaluating indicators of innovation and their impacts, whether positive or negative.

Acknowledging the Policy's considerations to improve energy rating tools, we strongly recommend future-proofing the tools. [Our recent report](#) highlights the need for this and revealed that currently the Planning system uses climate data from 1990 to 2015, which excludes the nine hottest years on record. We should not be building for a climate that no longer exists.

## **Include a selection of successful projects**

Currently, the Policy discusses various challenges cities face and reasons for making them resilient, sustainable, fair, and safe. However, it lacks real-life examples to show what these ideas mean in action. It also doesn't explain how existing policies can help achieve these goals. **We need Case Studies to show good examples of what the Government has done.** These can demonstrate how the principles were put into practice and what goals were accomplished.