THE UNIVERSITY OF SYDNEY

Urbanism Discipline Submission

University of Sydney School of Architecture, Design and Planning

Australian Government's Draft National Urban Policy

July 2024

The Urbanism Discipline at the University of Sydney School of Architecture, Design and Planning conducts world leading research on the design, characteristics, processes and impacts of urban settlements. We develop policy and land use planning innovations to create better cities and regions.

We recognise and pay respect to the Elders and communities – past, present, and emerging – of the lands that the University of Sydney's campuses stand on. For thousands of years they have shared and exchanged knowledges across innumerable generations for the benefit of all.

Contents

Executive Summary

The Urbanism Discipline at the University of Sydney School of Architecture, Design and Planning conducts world leading research on the design, characteristics, processes and impacts of urban settlements.

We commend the Albanese government for prioritising urban concerns and provide a series of recommendations to strengthen the draft National Urban Policy. In summary:

- Develop a plan for ongoing **consultation and monitoring.** The Australian people, and Australian research, can enhance this policy with grounded and empirical knowledge that is relevant to Australia's urban areas.

- Develop a more robust **organising framework** to draw together issues, principles and tangible action.

- Provide detail on actions for **implementation** and ensure that the policy has "teeth".

- Provide a **line-of-sight** between the policy and the Australian land-use planning system, and its relationship with existing state and national plans and policies.

- Use more **specific examples** that are based on **evidence** generated by Australian research.

- Recognise that **population policy** is an integral component of urban policy.

- Acknowledge that **housing** the Australian population is a fundamental human right and commit to investments of public equity in **social and affordable** housing at the Federal level.

We are available for future consultation, or to expand on any of the points raised in our submission.

Introduction

The Urbanism Discipline at the University of Sydney School of Architecture, Design and Planning welcomes the opportunity to comment on the Australian Government's draft National Urban Policy ("draft policy").

We commend the Albanese government for their ongoing focus on national urban policy. We appreciate the renewed focus on the planning and management of Australia's urban settlements as central to Australia's aspirations.

Research in Urbanism at the University of Sydney is world leading. Our work on housing, health, transport, governance and infrastructure features in policy, filters to practice and drives theoretical, conceptual and applied change. Having reviewed the draft strategy in detail, we draw the Government's attention to 6 key shortfalls in the policy as drafted.

1. Participation Before Consultation

Issue:

We implore the government to take consultation more seriously in urban policy propositions.

Effective constituent participation is crucial in urban planning. Participation goes beyond consultation. It implies the formation of a meaningful partnership with the people. In this sense, the procedure of consensus building matters as much as the outcome informed by constituent voices. Participation not only shapes better outcomes, it fosters a sense of belonging and empowerment[1]. Indeed, effective participation is central to the draft policy's goal for cities where people feel "connections within the community" (p17), as well as its goal to promote a "sense of belonging" (p6).

While we acknowledge that this submission is part of the consultation process, this draft policy does not stipulate clearly processes of consultation undertaken to date, nor does it articulate a precise plan for future and ongoing participation, including participation in review once implemented. Indeed, we note that an opportunity to comment on the draft policy's "shared vision" (p6) is not provided.

We are particularly concerned about the lack of consultation with the academic community in preparation of the draft policy. While we acknowledge that some academic entities were involved, we believe a lack of true engagement with the Australian urban research community is evidenced by the lack of references to peer-reviewed and internationally recognized scholarly work in the draft itself. Again, this is about building consensus and relationships with the community more generally, including the academic community. This document is also a way to foster a sense of respect for scholarly research amongst the Australian people, justifying the Government's ongoing commitment to funding applied research on cities. As is, it is a missed opportunity to showcase Australian expertise.

Recommendation:

- The finalised National Urban Policy (NUP) must be accompanied by a detailed register of consultation to date and a plan for future consultation, including beyond the release of the NUP.

---

[1] Kent, J. L, & Thompson, S. (2019). Planning Australia's Healthy Built Environments. New York: Routledge. ISBN: 9781138696365 (hbk).

- The NUP must include reference to Australian scholarly work as evidence of the Government's commitment to robust research in the Australian context and to evidence-based policy.

2. A Clear Line-of-Sight

Issue:

Strategic land use planning is only effective when there is a clear line-of-sight between goals, objectives and principles. We can see emergence of much needed grounded action through the draft policy's principles, however, there remains conceptual confusion between these principles and the goals and areas of focus. The draft policy does not specify a robust organising framework which can be used to direct and inform action on urban matters. The most obvious expression of this is the lack of relational detail in the "Areas of Focus" schema on page 6.

A key function of the NUP must be to assist, prioritise and guide Australian Government investment and policy decisions in our capital and regional cities. However, it is not clear how this policy will interact with or complement the Australian Infrastructure Plan, State and Territory infrastructure plans; and other regional and local urban strategies. The line-of-sight between the draft policy and these plans is unclear, as is the relationship to funding allocations and other targets and strategies.

Recommendation:

- The NUP needs to contain a robust organising framework to draw together issues, principles and tangible action.
- The NUP must provide a visual illustration and description of the relationship of the draft policy with the Australian Infrastructure Plan, as well as State and Territory infrastructure plans and other land-use planning strategies.

3. Implementation for Action

Issue:

The draft policy remains silent on serious action.

This is an opportunity for the government to prioritise building capabilities for real and grounded change as an essential component. While the draft policy acknowledges coordinated governance, stakeholder and community engagement, as well as pays some attention to the need for evidence-based decisions, it lacks specifics in its

national objectives. It articulates a series of well-known problems, yet fails to detail and ground the true challenges facing Australia's urban areas. Indeed, there is an overt omission of tangible, quantifiable goals to inform potential responses.

A genuine commitment to tangible and transformative capabilities is imperative for Australia's urban areas. Urban problems are urgent and will not be addressed through business-as-usual approaches, where Federal leadership is interpreted by those responsible for implementation as guidance rather than action-led direction[2]. We desperately need a framework to position urban areas as systems that are able to accommodate risk, and adapt and respond to change quickly. It is not enough for the policy to stipulate "best practice guidelines" (p41) because we know that guidelines do not create change when they are floated in the absence of mandate which is informed by understanding through an appropriate and robust evidence base[3].

Recommendations:

- The NUP should be a platform to support mandated action. It must stipulate quantifiable objectives for priority areas including housing, access, sustainability, equity, health and productivity.
- Progress towards these objectives should be able to be measured using publicly available data.

4. Use Evidence, Be Specific

Issue:

We can see recognition that urban policy must be informed by data, but as is, the draft policy alludes to data and its inclusion in the decision-making process in a way that is too vague to be useful.

To demonstrate this, and reflective of one component of our expertise, we focus on the policy's treatment of nature in urban policy:

> We commend the explicit link between restoration of nature in cities to the conservation of biodiversity (for example, p32). It is also encouraging that the draft policy recognises the need to "ensure equitable access and share of the benefits" (p41).

---

[2] Harris, P. (2022). Illuminating policy for health: Insights from a decade of researching urban and regional planning. *European Journal of Public Health, 33*(S2), ckad160.953. https://doi.org/10.1093/eurpub/ckad160.953.

[3] Harris, P., Kent, J., Sainsbury, P., Marie-Thow, A., Baum, F., Friel, S., & McCue, P. (2018). Creating 'healthy built environment' legislation in Australia; a policy analysis. *Health Promotion International*, *33*(6), 1090-1100. https://doi.org/10.1093/heapro/dax055.

As drafted, however, the policy offers very limited insight into what those benefits are, how they are calculated, and how they can be attained in existing and new urban areas. As such, at best they may be misunderstood by policy makers using the NUP for guidance, and at worst they may aggravate current inequities associated with the existing allocation and maintenance of nature in Australian urban areas[4].

For example, Australian longitudinal studies indicate that achieving a 30% tree canopy cover target within 1.6km of home reduces the risk of psychological distress over 6 years by 31%[5], diabetes by 31%, cardiovascular diseases by 22%, hypertension by 17%[6], and dementia over 11 years by 16%[7]. Furthermore, research links a local target of 30% tree canopy with a 22% reduced odds of insufficient sleep over 6 years[8], and over 4 years the odds of becoming lonely are reduced by over a half in adults who live alone and where 30% or more of the area within 1.6km of their home is parkland[9].

The NUP should detail this kind of evidence and go on to be specific and bold in its recommendations. For example, the NUP could be used to mandate a series of national targets:

- all neighbourhoods in Australian urban areas must have at least 30% tree canopy cover (as defined in research),
- establishment of a nationally standardised approach to limiting the felling of mature trees on public land,
- dedicated financial and administrative support for local governments to increase and enforce penalties for illegal felling of trees.

[4] Astell-Burt, T., Feng, X., Mavoa, S., Badland, H. M., & Giles-Corti, B. (2014). Do low-income neighbourhoods have the least green space? A cross-sectional study of Australia's most populous cities. *BMC Public Health*, *14*, 1-11.

[5] Astell-Burt, T., & Feng, X. (2019). Association of urban green space with mental health and general health among adults in Australia. *JAMA Network Open*, *2*(7), e198209-e198209. https://doi.org/10.1001/jamanetworkopen.2019.8209.

[6] Astell-Burt, T., & Feng, X. (2020a). Urban green space, tree canopy and prevention of cardiometabolic diseases: A multilevel longitudinal study of 46 786 Australians. *International Journal of Epidemiology*, *49*(3), 926-933. https://doi.org/10.1093/ije/dyz239.

[7] Astell-Burt, T., Navakatikyan, M. A., & Feng, X. (2020). Urban green space, tree canopy and 11-year risk of dementia in a cohort of 109,688 Australians. *Environment International*, *145*, 106102. https://doi.org/10.1016/j.envint.2020.106102.

[8] Astell-Burt, T., & Feng, X. (2020b). Does sleep grow on trees? A longitudinal study to investigate potential prevention of insufficient sleep with different types of urban green space. *SSM - Population Health*, *10*, 100497. https://doi.org/10.1016/j.ssmph.2019.100497.

[9] Astell-Burt, T., Hartig, T., Putra, I. G. N. E., Walsan, R., Dendup, T., & Feng, X. (2022). Green space and loneliness: A systematic review with theoretical and methodological guidance for future research. *Science of the Total Environment*, *847*, 157521. https://doi.org/10.1016/j.scitotenv.2022.157521.

It could stipulate clear guidelines and support for these mandates to be maintained over time and also plan for the conduct of a thorough audit of existing urban policies to determine unintended consequences for canopy cover from well-intentioned regulation. For example, road design guidelines that currently frame street trees as inherently impediments to driver visibility.

This absence of clarity is repeated and present in the various issues addressed by the policy. This is a missed opportunity to bring the public and policy makers on board through articulation of specificity. For example, health professionals are extremely useful as champions of good urban policy[10]. This trusted fraternity could become a critical source of support for successful implementation of the NUP, yet in the absence of specific evidence, it is difficult to harness this support.

In addition, we advise that the NUP must acknowledge that data comes in multiple forms and the scale of data used is relevant (through dashboards, digital platforms, repositories, community engagement, surveys, interviews). It must, therefore, pursue a comprehensive approach to evidence-based decision making to ensure that accurate and contextually grounded knowledge is used to create well-informed, bottom-up and effective urban policy.

Recommendation:

All urban issues and policy objectives must be understood within a comprehensive and unbiased knowledge base.

5. Population Policy is Urban Policy

Issue:

The NUP must recognise that Australian urban areas are shaped by population growth, which is becoming more and more volatile over time.

Population growth in Australian urban areas is mainly dominated by net overseas migration flows. While migration policy settings can be adjusted to ease pressures upon housing and infrastructure, it is increasingly common in Australia for migration to fuel

---

[10] Kent, J., & Thompson, S. (2012). Health and the built environment: Exploring foundations for a new interdisciplinary profession. *Journal of Environmental and Public Health*, *2012*(1), 958175. https://doi.org/10.1155/2012/958175.

growth surges. This occurred after Covid-19-induced lock-downs were eased[11], and prior to that in 2018-19[12].

Managing population growth in Australia into the future is less about the traditional approach of planning towards a steadily increasing total number over 20 years, and more about planning to adapt to volatile growth and distribution fluctuations and emerging risks over time. The NUP should recognise the links between the national migration policy and total population growth, and be more explicit about the implications of migration policy for housing and infrastructure planning. This is particularly important given the uncertainty and pressure of climate change, where our fragile environment and need to adapt makes population increases more difficult to absorb.

Recommendation:

- The NUP must acknowledge that migration policy is a key component of urban policy through the linking of migration targets to the quantifiable objectives and targets called for in section 1.3.
- The NUP must recognise that population growth and distribution is volatile, particularly in capital cities - it fluctuates. The NUP should facilitate a way for planning to move away from the assumption of a steady state growth profile and focus on adapting to the effects of the combination of changes.

6. Where is Resilience?

Issue:

"Resilient" is one of the five Australian Government goals for our urban areas. This is highly appropriate in the time of an advancing climate change emergency. Our cities and regions are facing unprecedented risks that stretch across different scales and complexities, due to multiple environmental disasters (e.g., bushfires, flood, cyclones) experienced within a series of shameful legacies of socioeconomic and cultural disparities. The experiences of recent major disasters have demonstrated that existing infrastructure and governance systems – for housing, transport, green-blue and social infrastructures – are vastly overwhelmed, and unable to effectively respond to the

---

[11] Australian Bureau of Statistics. (2024). *National, state and territory population, December 2023*. https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/dec-2023.

[12] Centre for Population. (2020). *Centre for Population analysis of the regional population data from the Australian Bureau of Statistics: Reference period: July 2018 - June 2019*. https://population.gov.au/data-and-forecasts/key-data-releases/regional-population-2018-19

cascading impacts[13]. Chronic issues identified include institutional fragmentation, rigid top-down governance neglecting local place-based knowledge and capacities, and poor accountability and communication[14, 15, 16].

Although these issues are urgent and plain to see, the draft policy fails to unpack them in a way that is comprehensive, strategic, targeted and adequate. It does not specify actions that are targeted enough to make a difference. It is ignorant to the dire need to support community-led and centred resilience practices in Australia's most affected regions (e.g., Northern Rivers)[17]. The draft policy misses a key opportunity to link with this recent line of research inquiry.

From a policy and practice perspective, the United Nations Office for Disaster Risk Reduction urges all countries to 'build back better' - to increase the resilience of communities through integrating disaster risk reduction measures into the restoration of physical infrastructure and societal systems, and into the revitalization of livelihoods, economies and the environment. This is a challenging task that requires a systematic rethinking of how we create the places we live in now, and how the post-disaster reconstruction is regulated, funded, and implemented (including but not limited to insurance regulations and payouts). We argue this is a challenge worthy of attention in the NUP. Leadership at the Federal level is required to pave the way for resilient cities via a commitment to build back better practices.

Recommendation:

A national commitment – with clear budgeting line - towards 'build back better' is needed to pave the way for the strategic reforms (e.g., insurance reform), and enable a meaningful push towards resilience, especially in the reconstruction phases following climate change induced major natural disasters.

---

[13] O'Kane, M., & Fuller, M. (2022). *Flood Inquiry Volume Two: Full Report*. NSW Independent Flood Inquiry. https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME_TWO_Full%20report.pdf.

[14] Lawrence, J., Blackett, P., & Cradock-Henry, N. A. (2020). Cascading climate change impacts and implications. *Climate Risk Management*, *29*, 100234. https://doi.org/10.1016/j.crm.2020.100234.

[15] Hurlimann, A., Moosavi, S., & Browne, G. R. (2021). Urban planning policy must do more to integrate climate change adaptation and mitigation actions. *Land Use Policy*, *101*, 105188. https://doi.org/10.1016/j.landusepol.2020.105188.

[16] Clements, R., Alizadeh, T., Searle, G., & Legacy, C. (2024). Meaningful public accountability in collaborative infrastructure governance: Lessons from Sydney's Western Parkland City. *Urban Policy and Research*, 1-15. https://doi.org/10.1080/08111146.2024.2340448.

[17] McNaught, R., Nalau, J., Hales, R., Pittaway, E., Handmer, J., & Renouf, J. (2024). Innovation and deadlock in governing disasters and climate change collaboratively - Lessons from the Northern Rivers region of New South Wales, Australia. *International Journal of Disaster Risk Reduction*, *105*, 104366. https://doi.org/10.1016/j.ijdrr.2024.104366.

7. A Note on Housing

Issue:

Housing is one of the most important determinants of health, productivity, resilience, and a sense of belonging[18]. The first objective of the draft policy is that no-one and no place is left behind, and housing affordability and availability are identified as key challenges. Housing need is widespread, with currently 648,000 Australian households experiencing unmet housing need[19]. More than 80% of very low-income households (i.e. households in the bottom 20%, or first quintile (Q1), of income distribution) renting in the private market (in 2016) were paying unaffordable rents[20]. This unmet need has significant human impacts as well as costs to the health system and reductions in productivity[21].

The National Housing Target is necessary and ambitious (p22). But it is a quintessential expression of the failure of Australian planning processes to adapt to demand when it occurs. Urban policy planning in Australia is too reactive and this is damaging our nation and its people.

The NUP and the National Planning Reform Blueprint must be stronger on the drive for adaptive planning not only for climate resilience but in terms of the changes to the demand for housing and infrastructure. To that end, data capture, analysis and projections and community engagement to manage the cycles of change will need to be rethought. Data capture and integration issues need recognition, especially understanding the rate of overcrowding and 'hidden' homelessness for marginalised communities including temporary migrants in Australia, eviction rates[22], and data on

---

[18] World Health Organisation. (2018). *Housing and Health Guidelines*. World Health Organisation. https://apps.who.int/iris/bitstream/handle/10665/276001/9789241550376-eng.pdf.

[19] Troy, L., van den Nouwelant, R., & Randolph, B. (2019). *Estimating need and costs of social and affordable housing delivery.* Commissioning Body: Community Housing Industry Association NSW. https://doi.org/10.26190/unsworks/27310.

[20] AHURI. (2024). What is difference between social housing and affordable housing – and why do they matter? AHURI. https://www.ahuri.edu.au/analysis/brief/what-difference-between-social-housing-and-affordable-housing-and-why-do-they-matter

[21] Box, E., Flatau, P., & Lester, L. (2022). Women sleeping rough: The health, social and economic costs of homelessness. *Health & Social Care in the Community, 30*(6), e4175-e4190. https://doi.org/10.1111/hsc.13811.

[22] Pawson, H., Martin, C., Sisson, A., Thompson, S., Fitzpatrick, S., & Marsh, A. (2021). *COVID-19: Rental housing and homelessness impacts - An initial analysis*. (ACOSS/UNSW Poverty &

different housing affordability parameters (e.g., number of affordable rental dwellings), as such issues pertain to difficulty in projecting the demand and need of affordable rental housing[23] and the scale of housing precarity in Australian cities and regions.

Changes to planning regulations cannot be relied upon to deliver higher or lower housing affordability, as the planning system does not impact on the cost of housing[24]. While the economic laws of demand and supply are often quoted to support concessions to the development industry, the industry will not supply a number of homes that exceeds the demand for homes at prices that fulfil requirements of lending institutions[25]. In short, the private market will not contribute to a fall in housing prices. As a result, only government intervention, through funding, subsidies, and in-kind support, can provide housing that is affordable to people on low to moderate incomes. Australia needs serious action plan for affordable housing supply targets, not only for social and public housing supply targets but also better regulations and price control measures for homeownership and rental housing markets[26].

Some of the possible actions identified in the draft policy are important, particularly leveraging the knowledge and experience of First Nations and multicultural communities in urban, landscape, and architectural design. It is encouraging that the draft policy recognises the need of key workers / workers for housing accessibility for better productivity. Key workers housing targets can achieve more than 'productivity' and workforce safety and well-being[27]. The other proposed actions will enable small scale and localised improvements to the housing sector but will not substantially

Inequality Partnership Reports; No. 7. Australian Council of Social Services and University of New South Wales. https://povertyandinequality.acoss.org.au/covid-19/housingimpacts/

[23] AHURI. (2024). What is difference between social housing and affordable housing – and why do they matter? AHURI. https://www.ahuri.edu.au/analysis/brief/what-difference-between-social-housing-and-affordable-housing-and-why-do-they-matter

[24] Gurran, N., & Phibbs, P. (2014). Evidence-free zone? Examining claims about planning performance and reform in New South Wales. *Australian Planner*, *51*(3), 232-242. https://doi.org/10.1080/07293682.2013.833121.

[25] Rowley, S., Costello, G., Higgins, D., & Phibbs, P. (2014). *Australian Housing and Urban Research Institute AHURI* (Vol. 219, pp. 1-84). Australian Housing and Urban Research Institute. http://hdl.handle.net/20.500.11937/46742

[26] Pawson, H., Martin, C., Sisson, A., Thompson, S., Fitzpatrick, S., & Marsh, A. (2021). *COVID-19: Rental housing and homelessness impacts - An initial analysis*. (ACOSS/UNSW Poverty & Inequality Partnership Reports; No. 7). Australian Council of Social Services and University of New South Wales. https://povertyandinequality.acoss.org.au/covid-19/housingimpacts/

[27] Gilbert, C., Nasreen, Z., & Gurran, N. (2021). *Housing key workers: scoping challenges, aspirations, and policy responses for Australian cities* (Report Number 355). AHURI Limited. https://www.ahuri.edu.au/research/final-reports/355

address the funding gap for social and affordable housing[28]. While government led solutions are required, the costs to governments of supplying affordable and social housing can be substantially reduced by including public equity in the investment mix to fund new dwellings[29].

Recommendations:

- Direct investments of public equity should fund social and affordable housing, as this produces housing at the lowest cost to the taxpayer.
- Market failure in housing provision for people on low to moderate incomes should be acknowledged.

[28] Troy, L., van den Nouwelant, R., & Randolph, B. (2019). *Estimating need and costs of social and affordable housing delivery.* Commissioning Body: Community Housing Industry Association NSW. https://doi.org/10.26190/unsworks/27310.

[29] Lawson, J., Denham, T., Dodson, D., Flanagan, K., Jacobs, K., Martin, C., Van den Nouwelant, R., Pawson, H. and Troy, L. (2019). *Social housing as infrastructure: Rationale, prioritisation and investment pathway* (AHURI Final Report No. 315). AHURI. https://hdl.handle.net/102.100.100/559038.

Contact

The Urbanism Discipline
University of Sydney School of Architecture, Design and Planning

Gadigal Land
Wilkinson Building, G04
148 City Road
Darlington   NSW 2006

Jennifer.kent@sydney.edu.au