

## UDA Submission on the National Urban Policy Consultation Draft – May 2024

The Urban Design Association NSW (UDA) is the peak body for urban design in NSW, with over 600 members, whose objective is to advance urban design as a profession playing an essential role in shaping better built environments. The UDA brings knowledge of the value that design thinking provides across urban scales and complexities and in delivering coordinated outcomes with economic, environmental and social benefits.

The UDA is delighted to see that the Federal Government has recognized the role urban environments have in shaping the life of most Australians and the importance that Australian cities, towns and suburbs play in meeting the pressing challenges to create healthy, equitable, resilient and stronger communities. Successfully addressing these challenges requires a coordinated approach and commitment across all levels of government. The Australian Federal Government is commended for recognising the urgent need for a National Urban Policy to guide decision-making towards more sustainable, livable and prosperous urban places.

The draft policy clearly articulates the challenges facing all Australian cities and urban places and restates well known universal goals, supported by objectives and principles, for desirable urban outcomes. The UDA supports the intent of the framework but raises strong concerns for the lack of recognition in the objectives of the critical role of design and integrated multi-scale approaches in delivering the policy aspirations.

UDA offers the following observations and recommendations based on our collective and extensive experience of how cities, towns and suburbs are shaped and of similar national policies from the past.

### Promote Design

Well-designed cities and suburbs address the pressing needs of our community and ensure the places we all want to live exist both now and into the future. At a national policy level, this means focusing more on the design of the big structural issues that impact our infrastructure and urban systems and less on types of activation that can occur within our localities, such as sports, arts and the nighttime economy.

Well-designed places don't happen by accident, but it does not necessarily cost more to create well designed places or to use change to improve the quality and performance of existing places. Great design elevates, it makes systems and places more effective and resilient. It inspires and adds value to our cities, not just to the new developments, but also to the loved and unloved parts of our existing cities. Livable places have a built environment, where not only are the built elements and public spaces well designed, but they are holistically integrated with natural systems and the design, planning and delivery of the supporting urban infrastructure.

Design is an iterative, integrating, challenging, and visionary process that generates better results. If we truly want Australia's urban places to be livable, equitable, productive, sustainable and resilient, then design cannot be discretionary, nor can it only occur as a discrete activity near the end of the process. Design needs to be a critical consideration throughout the process and urban designers, professional who are skilled at shaping cities and integrating the work of other disciplines, need to be more widely involved. For example, not one of the work packages charged with identifying the proposed corridor alignment and station locations for High Speed Rail appears to support or elevate the role of design in the process. <https://minister.infrastructure.gov.au/c-king/media-release/world-leading-experts-board-high-speed-rail>

For urban policy to be a success it needs to incorporate design at all levels of policy and holistically across the urban environment - when we are defining transport networks, creating healthier urban environments, shaping new development on the urban fringe or changing and building places that people love.

The UDA is pleased to see the revival of the Australian Urban Design Protocol for Australian Cities (2011), which set a strong national commitment for the role of design in shaping Australian cities. While the goals and objectives remain broadly relevant, a review is needed to more directly address current challenges and to better guide its application by government in decision making across policies and projects

*UDA Recommendations:*

- *The National Urban Policy should elevate design and increase consideration of 'design' as a process (ie. design and planning processes); an activity (i.e. design of urban areas); and an outcome (ie ensure the design of streets creates places which people love).*
- *Update the Australian Urban Design Protocol for Australian Cities principles and application.*


## Think national, empower local

Australia has a huge diversity of urban morphologies, shaped by different histories, landforms, climates and cultural forces. Place is always shaped at the local level and one solution does not fit all contexts. A National Urban Policy should recognize the great richness and diversity of representative contexts and typologies and avoid general solutions that may not 'fit' every context and that could result in prioritising one part of a city at a cost to other parts.

For example, the draft policy states that "the provision of schooling should be front and centre in **new** urban developments to ensure all children have access to high quality education" (emphasis added). The UDA supports prioritising the provision of schooling, however access to high quality education should be extended to all existing areas and all areas of population intensification, including greenfield and urban infill areas. In existing areas finding sufficient land for new or expanded schools is often even more difficult than providing schools in greenfield areas.

Local government has an important role to play in shaping and planning places. They understand the spatial realities at the scale of local places and human habitation and experience first-hand the implications of systemic decisions on interrelated functions. There is an opportunity for a National Urban Policy to guide local decision making and more clearly define the broader frameworks and shared benchmarks that can bring together all levels of government in the shaping of the urban environment.

*UDA Recommendations:*

- *The National Urban Policy should set national benchmarks that are flexible enough to encourage change across the entire country.*
  - *The National Urban Policy should empower and support local governments who are often the experts on their place, its qualities, challenges and community.*
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## Foster an integrated approach

City elements are part of a complex interconnected system that operates across multiple scales. In the past Australia has tended to rely on conventional, top down, single scale urban planning to shape the future of our urban environments. This 'trickle down' approach is slow and inefficient at creating change; siloed and planned from the top down; and years of rewriting policies, documents, frameworks and guidelines has struggled to generate transformational change. A systems thinking approach is needed that looks beyond the individual policies for one element and identifies the interconnections between the complex forces that shape our cities. For example, a new road or railway station in one location could reshape the city structure, bringing jobs and benefits to one area while introducing pollution, congestion and severance to another.

A National Urban Policy that considers the elements of a city as separate individual issues, for example a policy for transport, another for land uses and another for economic success, will not only fail to address the interconnected impacts and benefits, but it will also create fragmented disjointed solutions. The policy needs to recognise cities are made up of a network of inter-dependent parts and that strategically pulling one lever can multiply benefits across the system. For example, a National Urban Policy that aims to underground infrastructure and remove power poles would not only reduce vulnerability to storms and bushfires but would also improve the quality of streets, encourage walking and increase tree canopy and local habitat for flora and fauna.

The adoption of a multi-scale method to strategically plan and design our cities is also needed to inform decisions at each stage. This type of approach uses multidimensional themes and information at multiple scales, across an iterative process of spatial analysis, options, design proposals and assessment. The 'multi-scale method' of the NSW Government framework Movement and Place [Multi-Scale Method \(nsw.gov.au\)](https://www.nsw.gov.au/multi-scale-method) illustrates this process.

### *UDA Recommendations:*

- *The National Urban Policy should promote a systems approach to strategic design and planning. It should ensure no issue is ever considered in isolation as a single issue or theme.*
- *The National Urban Policy should ensure that a multi-scale method is used to iteratively plan and design, using multidimensional themes and information at multiple scales to inform decisions at each stage.*

## Benchmarks that catalyze

The draft National Urban Policy fails to identify benchmarks for the biggest issues facing our complex and diverse urban places. A National Urban Policy needs a synthesised focus that identifies the key priorities with short, medium and long term actions. It's a long-held truism that we tend to only value what we measure and for the policy to be a success it needs a clear implementation plan, not just a series of 'possible actions'. It is also critical that the tradeoffs are clearly understood and addressed through integrated scenario planning and design that establishes transparent and rigorous quantitative and qualitative benchmarks for success.

As an example, the policy states that the "National Cabinet agreed to a National Planning Reform Blueprint that outlines planning, zoning, land release and other measures to improve housing supply. Implementing these reforms will be critical in addressing the housing challenges in our cities and **are a good opportunity to test and pilot better ways of building houses that are more resilient and more suited to the changing climate, and encourage the building industry's transition to net zero.**" (emphasis added). Unfortunately, the current Blueprint is focused on "increasing supply" while in the long-term, Australia needs benchmarks that deliver both increased housing and encourages a transition to net zero.



There is a need for benchmarks to drive coordinated outcomes, for example to ensure that new housing is collocated with a 'train station' that is frequently serviced and also well-connected to local jobs, services, and facilities. The National Urban Policy needs to be less about general platitudes such as "Housing should be in close proximity to where employment opportunities are located, as well as to transport and other services" and clearer about national benchmarks that define a 'well located home'. Benchmarks need to identify minimum standards for issues like regular and reliable public transport (I.e. a bus or train every 15mins into the evening and on weekends), percentage of local jobs accessible within 30mins and the level of access to education and healthcare (by time, not distance).

*UDA Recommendation:*

- *The National Urban Policy should clearly identify actions, benchmarks and measurements of success that can catalyse action across government. For example "50% of all primary school children will walk or cycle to school by 2035".*

## Dynamic and future facing

Our urban environments are continually facing new challenges. For example, changes in shopping and banking are altering patterns of behaviour and reshaping our main streets; changes in personal mobility are creating conflicts on our footpaths; and changes in climate are increasing vulnerability to storm events. The urban structures of our cities and suburbs should last hundreds of years but an urban policy that only looks to address the challenges of the past will struggle to address the challenges of the future.

The National Urban Policy should identify and prioritise a limited number of the big cross discipline tangible issues facing our urban places. For example, in areas that are transitioning from suburban development patterns with large private back gardens to urban development patterns, the size and design of public open spaces needs to change to meet the need for more intensive use of public space, such as those of families with teenagers living in apartments. Focused benchmarks and actions could help address key cross discipline challenges such as: the 3 biggest issues for low density housing on the fringe; the 3 biggest issues for active transport; the 3 biggest issues for high density housing; the 3 biggest issues for organized sport; and the 3 biggest issues for regional centres.

*UDA Recommendation:*

- *The National Urban Policy should clearly identify actions and benchmarks for a limited number of big cross discipline issues to help all levels of government prioritise and address key urban issues in an integrated, forward-thinking way.*

## Conclusion

This UDA submission illustrates the value that urban design expertise and its deep understanding about the forces that shape our cities and suburbs, can bring to a National Urban Policy. It shows how increasing consideration of 'design' as a process, an activity and an outcome and establishing multi scale, cross disciplinary systems and benchmarks will elevate the effectiveness and impact of a National Urban Policy to address our key urban challenges and deliver transformation change.

Critically the UDA advocates for a greater involvement of the urban design profession and an increased recognition of the role of design in the creation, review and implementation of the National Urban Policy to help ensure all of Australia's urban environments are more liveable, equitable, productive, sustainable and resilient.

