

Introduction

- The Victorian Government Department of Transport and Planning (DTP) welcomes the Commonwealth Government's leadership in developing a new National Urban Policy (NUP).
- A key focus for the Victorian Government is the development of a new strategic plan for the state – a plan for Victoria. DTP notes strong alignment between the goals guiding the draft NUP (creating liveable; equitable; productive; sustainable; and resilient cities and suburbs) and the five pillars guiding public engagement on a new plan for Victoria (Affordable Housing and Choice, Equity and Jobs, Thriving and Liveable Suburbs and Towns, Sustainable Environments and Climate Action and Self Determination and Caring for Country).
- A plan for Victoria is one of many initiatives being implemented as part of *Victoria's Housing Statement* (2023). DTP is cognisant that it is a critical time nationwide in terms of providing improved housing choice and affordability for communities.
- There are a range of planning and building system reforms being progressed in Victoria to support more homes for Victorians, to facilitate urban renewal opportunities and plan for equitable access to jobs and services.
- The NUP comes at an opportune time for Victoria, with draft local government housing targets released in June 2024, which the Victorian Government will implement as part of a plan for Victoria. The housing targets will align with the statewide aspiration for 70:30 (that is, 70 per cent of development in established areas, 30 per cent in greenfield areas) – achieving sustainable footprints for our urban centres and protecting our significant landscapes and agricultural land from urban development.
- Through this document, DTP outlines suggested opportunities to clarify and strengthen the NUP. We welcome any further discussion on matters raised.
- DTP looks forward to further opportunities to collaborate in the finalisation and implementation of the NUP.



General comments

- The role and purpose of the NUP in relation to federal and state governments' roles and decision making should be more explicitly outlined. In particular, if the NUP is going to guide the Commonwealth Government's investment and policy decisions – particularly as they relate to funding for infrastructure and services – then greater clarity and explanation on how the NUP is to be used to guide those decisions as opposed to state endorsed planning frameworks would be useful.
- DTP is currently undertaking engagement and development of a new plan for Victoria and other land policy and legislative reviews – there should be some alignment of outcomes from the respective pieces of work across the various levels of government.
- United Nations Sustainable Development Goals (SDGs) are mentioned on page 9. DTP notes that SDG 11 is relevant, however there are many other relevant goals that should be mentioned and addressed. Indeed, the SDGs are meant to be addressed in an integrated way. For example, SDG1 – No poverty, SDG3 – Health and Well-being, SDG6 – Clean Water and Sanitation, SDG7 – Affordable and Clean Energy, SDG8 – Decent Work and Economic Growth, SDG9 – Industry, Innovation and Infrastructure, SDG10 – Reduced Inequalities, SDG12 – Responsible Consumption and Production, SDG13 – Climate Action, SDG14 – Life Below Water, and SDG 15 – Life on Land. Also, SDG 17 – Partnerships for the Goals is particularly relevant if the intent is to co-ordinate efforts across states and territories involving governments, Traditional Owners, other stakeholders and all people.
- There is potential for the NUP to more strongly consider the interrelationship and reliance on non-urban regional areas by cities and towns for food production and key infrastructure such as energy and water.
- There is no real 'sense of urgency' evident in much of the policy. Principle 3 in Appendix A states "We cannot achieve sustainable urban development through business-as-usual approaches. We need transformational change across and within all five domains of urban planning" This acknowledgement of a shift from business-as-usual and transformational change needs to be up front to emphasise the required 'step-change' in our approach to the design of our built environment.
- There is potential for the NUP to better emphasise a 'compact urban form' as a key objective to achieve all other sustainability objectives. See related work from [Infrastructure Victoria](#).
- There is an opportunity to better emphasise urban design. Design is only related to safety in the public realm; and inclusive, accessible, liveable and equitable spaces.
- Reference to a "well-designed" city needs to be strengthened by a more comprehensive definition of what "well-designed" is.
- Similarly, the baseline of the National Construction Code to meet "the liveability of newly built homes" is not enough to ensure a high-quality design that responds to the broader challenges and results in a high-quality urban environment.
- To positively influence the urban design of our cities and towns, the purpose needs to articulate why urban design is as important as policy and planning. The objectives of this policy are all reliant on high-quality spatial arrangements of urban form – design-led shaping of our towns and cities.
- The structure and content of the NUP would benefit from being organised in a way that facilitates state and local governments to align their own strategies and planning frameworks to it. For example, the streamlining of goals, objectives and principles. Overall, the principles are clearest about their meaning and how they can be achieved.
- There is potential for the NUP to adopt a framework for defining liveability to succinctly set out what infrastructure, services and amenity urban areas need to make them liveable (i.e. the things that facilitate connection, participation, opportunity, wellbeing etc.). This would help organise the diverse range of objectives and issues that the NUP canvasses.
- Ensuring urban environments promote health and well-being requires consideration of amenity issues such as noise mitigation and improving urban air quality. Remediation and re-use of contaminated



land also plays an important role in reducing community health risks while supporting urban development and densification. The NUP could consider these issues with a view to supporting future urban health and liveability.

- Suggestion to include a comprehensive index for the document that includes references to issues (e.g. open space, education facilities, community development, civic participation etc.) as well as different demographics (e.g. youth, elderly, First Nations, LGBTIQ+, women, lower socioeconomic etc.). The point being that people that read the document with a particular area of interest can track references to their interest areas easily.

First Peoples

- First Peoples experience significant urban policy challenges as there are minimal mechanisms for Traditional Owners to assert their rights over land that has been urbanised and developed.
- Whilst effort has been made to address specific themes pertinent to the policy, DTP would like to see further engagement with First Nations People and in particular Traditional Owners, who DTP see as delivery partners.
- To support First Peoples engagement across the Victorian Transport and Planning Portfolio, DTP's Wurrek-al 'Talking with Purpose' First Peoples Engagement Framework sets out expectations when engaging with Traditional Owners and the First Peoples community, and aims to equip staff with the necessary skills to engage effectively and meaningfully.
- The NUP should consider the importance and value of Traditional Owners and First Peoples in urban planning and policy, specifically First Peoples economic development, connection to Country, language revitalisation, cultural heritage etc. Themes should be woven throughout the document where appropriate, in addition to the standalone First Nations section, and reference given to the increasing recognition of Traditional Owners as Native Title holders across the country, including in urban spaces. The document would also benefit from references to Closing the Gap strategies, and how the policy can assist in meeting targets.

Implementation

- Suggest clarifying the intent of the NUP and how it will be translated into action. In particular, the document should be more explicit about the respective roles and responsibilities of state and local government and federal agencies in delivering against the objectives of the policy.
- The NUP is not clear on how it is intended to be implemented through legislative frameworks and planning systems. What multi-lateral governance frameworks are proposed to co-ordinate across governments and other sectors? The NUP could identify some practical means for implementation. For instance, the sharing of case studies could be useful.
- There is potential for the NUP to detail an evaluation or reporting system to measure the success of the policy. Further information could be provided on the role of the State of Cities Report to detail how the NUP and its objectives will be monitored across jurisdictions. There would be benefit in proposed data points and methodologies being included in the framework to ensure monitoring is consistent over the long term.

Preamble

Section	Comment	Suggested changes
Acknowledgement of Country	A more robust Acknowledgement of Country is suggested, that is pertinent to the policy itself, and acknowledges the inherent rights and interests of Traditional Owners, speaks to self-determination, and acknowledges the long-lasting, far-reaching and intergenerational consequences of colonisation and dispossession.	DTP's Wurrek-al 'Talking with Purpose' First Peoples Engagement Framework includes an acknowledgement that can be tailored to a particular policy environment.



		<p>Suggested acknowledgement:</p> <p><i>The Government acknowledges the impact colonial planning systems have had, and continue to have, on First Peoples; in particular their ability to exercise their rights and cultural obligations, to protect and speak for Country, and enjoy economic benefit from land they have been denied access.</i></p>
<p>First Nations</p>	<p>This section would benefit from distinguishing between First Australians and Traditional Owners, noting Traditional Owner as distinct rights holders. The use of the sentence ‘First Nations people have successfully lived on Country and managed the lands, waters and resources throughout mainland Australia for at least 65,000 years’ is problematic, and is a notion likely to be challenged by, and potentially offensive to, First Nations people - noting the detrimental impact of colonisation Traditional Owners are unlikely to agree that they have been successful in managing their Country. This section may also benefit from inclusion of elements of United Nations Declaration on the Rights of Indigenous People, to which the Australian Government is a signatory.</p> <p>Overall, this section is framed too positively and does not acknowledge that changes to Traditional Country occurred without any consultation or consent and caused an irreversible and devastating impact on Traditional Owners.</p> <p>More robust statements that reflect on the impacts of colonisation in this section align with statements made by the Victorian Government Minister for Planning in her testimony to the Yoorrook Justice Commission.</p>	<p>Suggested inclusion:</p> <p><i>“Urban planning has traditionally been undertaken from a settler colonial perspective, without input from or regard for the interests of First Nations People. More often than not, First Peoples’ views were neither sought nor considered in the planning process, and First Peoples’ rights have not been recognised or respected. The new National Urban Policy presents an opportunity to right some of the wrongs of the past, by placing greater emphasis on the importance of First Nations perspectives in policy design, acknowledging that First Nations People and Traditional Owners have not properly been afforded the opportunity to participate in the planning of established urban spaces.”</i></p>
<p>The National Urban Policy figure (page 6)</p>	<p>Australian Government Objectives – Areas of Focus (p6)</p> <p>All people belong and welcome</p> <p>1. ‘Preservation of First Nations Cultural Heritage’. We view this as a legal obligation and recommend that this be amended to “Protection, preservation and promotion of First Nations Cultural Heritage” noting that cultural heritage is not static and evolves.</p>	



	<p>2. 'Investments in sports infrastructure'. Broaden the reference to infrastructure to 'community infrastructure' which includes more than sports infrastructure.</p>	
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Part 1 Introduction

Section	Comment	Suggested changes
Overview	Suggest revision of wording	Following the development of the Policy, the Australian Government will also work with states, territories and local governments to develop initiatives that deliver on the shared vision, consistent with our Policy objectives. Implementation of the policy is intended to address urgent challenges facing our cities, such as socio-economic disadvantage, inequality in access to infrastructure and services, educational outcomes , housing, productivity, social cohesion, disaster resilience and climate action
Overview	To more strongly support the ambition to integrate an 'urban lens across policy-making' a description and definition of what it is shaping is important, namely urban design. To positively influence the urban design of our cities and towns, the purpose needs to articulate why urban design is as important as policy and planning. The objectives of this policy are all reliant on high-quality spatial arrangements of urban form – a design-led shaping of our towns and cities.	Consider including culturally safe or culturally appropriate as an objective or goal.
Purpose	The NUP does not clearly define its scope. Is it intended to focus on land use planning, since it is being coordinated through the Planning Ministers? If so, there is content in the NUP that planning frameworks have little control over.	It is recommended that the purpose section outlines the scope of this policy, and if relevant, the scope land use planning has in achieving the vision and the importance other sectors may have in developing a holistic approach to address the urban issues identified.



Purpose	In addition to informing Federal funding decisions, the policy can describe a purpose for national-level urban policy to provide a framework for addressing challenges where it is not useful to have multiple policy approaches across the country providing un-useful competition or confusion to national/international markets.	Additions to purpose could include: Guiding settlement patterns in the context of climate risk Providing a consistent framework for sustainable development, addressing flooding and inundation, and addressing climate-stranded assets.
Australia's National Urban Policy	The NUP could benefit from the inclusion of a spatial element, such as including mapping of urban hierarchies, visual data, graphics of key urban indicators, natural features and resources, state of the environment, opportunities and constraints for urban growth and consolidation.	
Australia's National Urban Policy (First Nations Engagement section)	It would be useful for the document to clarify whether Traditional Owners were engaged as well as First Nations 'stakeholders'. DTP has moved away from language that limits the role of Traditional Owners to 'stakeholders', rather partners in the management of Country, who possess a distinct role in policy development impacting the management of their land. The three categories that have been identified in the final report don't provide any clear link to the key topics that emerged through consultation (culture, housing and climate change). It is recommended that the NUP should more clearly articulate and provide more information on the 15 recommendations and how they relate to First Peoples rights and aspirations under the three categories with better line of sight back to the key topics.	Change 'stakeholder' to 'partner'. DTP's Wurrek-al 'Talking with Purpose' First Peoples Engagement Framework provides an example of an acknowledgement that can be tailored to a particular policy environment (see earlier comments).
Regional Investment Framework	A Regional Investment Framework and National Urban Policy will form important cornerstones for guiding change and prioritisation however neither document provide guidance for prioritisation nor next steps around how this will occur.	Greater measurability in the "Possible Actions" section of the policy would provide reassurance and clarity around prioritisation, guidance and measurement and evaluation of success.

Part 2. Shared Government Vision and Roles

Section	Comment	Suggested changes
Urban roles and responsibilities	Further information could be included about how the final NUP is going to guide funding for infrastructure and services by the Federal Government.	Outline pathway for Treasury consideration of the Goals outlined in the National Urban Policy when determining future budget items.



Urban roles and responsibilities	While acknowledging constitutional limitations, the role that the Commonwealth intends to take in urban policy should be more fully described, including the ways that it can contribute to partnership approaches with other levels of government.	This section should describe what the Commonwealth will bring to partnership approaches with other tiers of government (thus providing clarity to the actions identified as “Collaborate with state, territory and local governments, to:” for each objective area).
Urban role and responsibilities – State and territory governments and Local governments	<p>The key role that State and territory and local governments have for strategic and land use planning of the urban area at different scales is missing.</p> <p>The role described for states and territories should be broadened to acknowledge the full breadth, for example, in addition to delivering infrastructure and services, state and territories also:</p> <ul style="list-style-type: none"> • play a leading role in designing and regulating the systems which oversee urban planning. • includes the delivery of public housing, supportive housing, and homelessness services. <p>Local governments do more than building approvals, waste management, local roads/footpaths/cycles. Local governments create spaces and places that improve liveability and thriving localities. Local matters such as infrastructure, active transport, community planning and strengthening.</p>	<p>Update the Urban roles and responsibilities to better reflect the landscape. (e.g. Expand state matters to include strategic planning and approvals, education; Expand local matters to include strategic planning and approvals, open space.)</p> <p>Add ‘social and affordable housing, supportive housing, and homelessness services’ to role of state and territory governments.</p> <p>Amend icons at the top of page 14 accordingly.</p>
Urban role and responsibilities – Private sector	The role of the private sector is understated as it delivers most of the commercial and residential development across Australia and not just critical urban projects.	This should also be expanded to include the contributions that are made by the private sector to fund infrastructure and services to support urban growth as part of development approvals and not be limited to large infrastructure projects funded through private-public partnerships only.
Urban role and responsibilities – Communities and people	The description is focussed mostly on community participation. It would benefit from having some reference to the diversity of communities and people within Australia, and some reference to how that diversity is expected to increase as population growth will continue to be driven by migration.	
Urban roles and responsibilities – Communities and people	Reword the following ‘Effective community engagement and participation leads to greater support for urban planning initiatives put forward by government and private entities’. (page 15)	Effective community capacity building , engagement and participation leads to greater support for urban



		planning initiatives put forward by government and private entities.
Urban roles and responsibilities	Specific reference should be given to Traditional Owners as specific rights holders.	A stand-alone section should be inserted for Traditional Owners (pp14-15, alongside local governments, private sector, communities and people) that references the growing Indigenous estate and the number of Prescribed Bodies Corporate/Traditional Owner Group Entities that have recognised rights over Country, with particular reference to urban areas and the urban fringe. Their responsibilities and aspirations should be included, as well as how they will be engaged in development.

Part 3: Australian Government Goals

Section	Comment	Suggested changes
General	Section notes the interrelationship between goals and that "In many cases, addressing one goal in isolation may have a positive or negative impact on the others". The final NUP would benefit from clearly identifying possible negative impacts and how to find balance between the goals to get the best outcome.	
General	Definition of social infrastructure - there is benefit in more specificity to improve consistency at a national level, as there are many interpretations. Examples of social infrastructure could include early years and youth services; medical, allied health, aged and disability care services; education facilities; multi-purpose community facilities and community hubs; arts and cultural facilities; libraries; public open space; indoor and outdoor sports and active recreation facilities; justice facilities; and cemeteries. DTP notes need for clarity on what will be considered fair and/or equitable access to resources, opportunities and amenities – as there is likely to be geographical variation within cities and across the country. As well as clarity on how equitable access to essential services and social infrastructure will be considered or monitored.	



Liveable	'Respect for the sacredness of Country for First Nations people' is limiting.	Consider inserting culturally safe as a liveability factor.
Equitable	The section does not give regard to the unique circumstances of First Nations People in relation to equity and would benefit from reference to how this section will assist in achieving Closing the Gap goals.	
Productive	DTP seeks stronger representation of innovation, skills and agglomeration elements described here in the corresponding Objective and Potential Actions (pp. 36-38)	
Sustainable	Traditional knowledge is a cultural asset and the intellectual property rights of First People over their traditional knowledge needs to be considered and promoted.	"Insights from the tradition knowledge of First Nations people" could be amended to "Work in partnership with Traditional Knowledge holders".
Resilient	The particular resilience of First Nations People should be included and applauded here, as the world's oldest continuous living culture despite the significant hardships they have faced as a result of colonisation. Reference should be included to how they have managed Country for thousands of years and the need to learn from these experiences and practices	

Part 4: Australian Government Objectives

Section	Comment	Suggested changes
No-one and no place left behind	<p>Housing diversity is a key issue that would benefit from being explicitly acknowledged and detailed, particularly for different household types such as lone persons, families with children, empty nesters, ageing couples and singles, key worker population etc.</p> <p>The NUP is missing one key policy action that could address the shortage and need for social and affordable housing, which would be through direct government investment and funding. The NUP continues to rely on the delivery of most housing, both market and affordable housing, from development undertaken by the private sector. Funding and investment support is primarily provided by the Commonwealth for supporting infrastructure, rather than building homes.</p> <p><u>Objective 1, 3rd paragraph:</u> The paragraph states that housing affordability issues disproportionately affect younger households and those with low to moderate incomes. This should be expanded to include those with very low to moderate incomes to be consistent with the definition for affordable housing outlined in the <i>Planning and Environment Act, 1987</i> of Victoria</p>	<p>Add an additional action linked to social and affordable housing</p> <p>Update objective 1 to better reflect very low to moderate income definition</p>



<p>No-one and no place left behind</p> <p>All people belong and are welcome</p> <p>Our urban areas are safe</p>	<p>The section should be revised to reference Closing the Gap initiatives relevant to the challenges. Sections referencing First Nations disadvantage should be stand alone and expanded upon to recognise the unique experience of First Nations people as a special category separate from other disadvantaged cohorts, such as migrants.</p> <p>There's a missed opportunity to give First Peoples and Self Determination due weight by currently combining this subject with tourism, sport and the night-time economy.</p> <p>The 'Possible Actions' section should include specific reference to how actions can be aligned with Closing the Gap reforms</p>	
<p>All people belong and are welcome</p>	<p>Reword the following to include a broader reference to social and local community infrastructure, rather than focussing on sports infrastructure:</p> <p>p.21 - 'Increasing sustainability and accessibility in tourism, and investing in sport infrastructure can improve social cohesion and a sense of belonging in communities.'</p> <p>p.27 (possible actions) 'providing national guidance for funding priorities relating to the creative sector, tourism, heritage and sport infrastructure'</p>	
<p>Our urban areas are safe</p>	<p>There is no explicit reference to the word 'prevention' (or equivalent) as a standalone action. Instead, it is couched as a potential subset / buried under other phrases/terminology for example at pp29-30:</p> <div data-bbox="416 1272 1075 1648" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <ul style="list-style-type: none"> • <i>Manage future climate risks for the built environment by identifying high risk locations and revising policy, regulation and such as:</i> <ul style="list-style-type: none"> – <i>revise planning systems to prevent building homes and critical infrastructure where risk is not proposed or able to be mitigated in high-risk zones</i> – <i>for existing buildings, support communities and households to invest in risk reduction infrastructure, retrofit their buildings, or plan for managed retreat.</i> </div> <p>A 'Possible action' that we '—consider disaster and climate risk in land use planning' (bottom of pg.29) embodies the problem. There is opportunity through the NUP to consider <u>and put in place</u> a national harmonised approach and action more strongly.</p> <p>The 'Discussion' section should include risks from the built environment too (Major Hazard Facility's, high pressure pipelines, airport operations etc). For example, infrastructure owners / leaseholders need to be required</p>	<p>Elevate the actions to show national leadership and agree a harmonised strategic land use planning approach to risk and resilience e.g. "Prohibit new land use and development in highest risk locations", "Plan for managed retreat in existing locations identified as high risk and not able to be mitigated etc.", "Prioritise avoidance over construction in high risk areas"</p>



	to publish data about risks to properly inform strategic land use planning decisions.	
Our urban areas are sustainable	<p>Acknowledge role of leveraging existing infrastructure through increased density in reducing emissions, as well as retrofitting and renovating existing buildings to operate more sustainably.</p> <p>Networks of green and blue spaces still have to be in the right places with the right mitigation treatments and classes of vegetation so as not to increase flood and bushfire risk.</p> <p>Green spaces need to be managed in partnership with Traditional Owners and draw on their knowledge, with actions that enable them to manage open public spaces and support biodiversity, playing an active role in protection, restoration and rehabilitation.</p> <p>'Ensure First Nations communities' valuable knowledge is incorporated into climate initiatives' is an insufficient statement and a section should be developed on how Traditional Owners will be partnered with to manage these spaces in a self-determining manner.</p> <p>Is the NUP going to guide continued coordination between levels of Government? Roles and responsibilities outlines the current context (page 13) whereas multiple possible actions refer to improving or supporting coordination to address urban challenges (page 32, 38). Is there going to be new arrangement or are these possible actions related to existing coordination points? Will there be funding available to support new arrangements?</p>	<p>Building and construction emissions: Buildings contribute significantly to greenhouse gas emissions. Improved energy performance and sustainable materials can help decarbonise the built environment, including by increasing density and leveraging existing infrastructure.</p>
Our urban environments and communities promote health and wellbeing	<p>Housing quality is listed as a key urban challenge, yet no possible actions to address this are identified.</p> <p>Propose reference to initiatives to strengthen community cohesion, resilience and leadership. This objective should be broader than open space, housing and transport connectivity; it also needs to include those "less tangible" factors that increase community well-being, like civic participation, individual and community wellbeing, social opportunity and inclusion etc.</p> <p><i>"For many First Nations people, an essential feature of a liveable urban environment where communities thrive is one where emphasis is placed on the importance of connecting to Country. Country signifies the whole environment of an area and includes Sea Country and Sky Country. To create a liveable city with healthy, happy communities, it is imperative to nurture not only the deep-rooted connection to Country but also the vital connections among people, fostering a sense of community and shared responsibility".</i> It would greatly benefit the NUP if there was greater recognition of</p>	<p>The federal government should clearly articulate its role and actions in this space or alternatively identify how it will support state and local government to improve housing quality in the context of supply and affordability challenges.</p> <p>Possible actions could also include partnering with Traditional Owners to create native bushfoods areas.</p>



	<p>Traditional Owner rights throughout the policy document itself.</p>	
<p>Our urban areas promote productivity</p>	<p>The policy is silent on the spatial concentration of highly productive sectors through innovation precincts and other state-significant or nationally-significant employment areas, and the role of government in providing the assets for relevant industries to excel. The objective is scoped too narrowly, capturing DITRDCA portfolios only. Urban policy focussing on productive cities would benefit from reflecting whole-of-government levers relevant to each level of government.</p> <p>The key gap is the role of Federal industry policy, research priorities and tertiary education policy in supporting to spatially concentrated innovative sectors (e.g. in innovation precincts) that underpin current and future prosperity.</p> <p>Opportunity to also address improvements in educational outcomes particularly in areas of entrenched socio-economic disadvantage.</p> <p>Opportunity to refer to opportunity to harness the upsides of hybrid/flexible working under this objective.</p> <p>Suggest more specific actions addressing systemic barriers for disadvantaged groups, including single-parent families, people with disability, and First Nations people.</p>	<p>Actions should seek to direct Federal support for priority sectors into places where connections between firms and with researchers can drive innovation and economies of scale. (E.g. the Future Made in Australia framework's reference to supporting common-use infrastructure can be leveraged here).</p> <p>The role of universities in city innovation ecosystems should be acknowledged with policy direction to support university investments that drive connections and co-locations with industry to maximise the economic impact of research.</p>

Appendices

Section	Comment	Suggested changes
Appendix A: Principles	The Principles are a critical component of the work and where many key delivery partners (local and state/territory governments, and federal agencies) will see their work reflected.	DTP strongly suggests moving these into the body of the policy.
Appendix A: Principles	<p>Clarity is required on how the Principles are going to be implemented and what State Government's responsibilities are.</p> <p>In the introductory paragraph the principles are suggested as a guide to decision making and are intended to inform the achievement of the NUP's goals and objectives. However, the wording of the six principles then uses terms such as "must" for what is to be achieved. This seems at odds with a framework to guide and inform. The objectives of the NUP also only sets out 'possible actions'.</p>	<p>Consider changing the terminology that is used for the six principles in Appendix A and replace "must" with an appropriate term.</p> <p>Include information about how the principles will be implemented and how this differs from the possible actions.</p>
Appendix A: Principles	The Principles stop short of committing to Urban Design as a way of achieving outcomes, stopping at urban planning. To date, urban planning alone has not been able to provide the urban outcomes needed to address the inequity and lack of quality in our current urban form. Although Principle 2 does refer to the Urban Design Protocol, elevating Urban Design to be included in the overall commitment of Principles, and integrating it into each one, is key to shifting the approach to our urban form.	
Appendix A: Principles	<p>The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) principles should be referenced.</p> <p>Specific regard to Traditional Owners as rights holders and partners in managing Country, as opposed to stakeholders, needs to be given weight. Traditional Owners need to be considered as a standalone category, and separate to other cohorts of the community.</p>	