

Submission for the National Urban Policy 280624

Thank you for the opportunity to provide feedback on the draft National Urban Policy. We commend the Commonwealth government for taking this initiative. In our view, it takes an important and timely step forward in many areas:

- It recognises the wide range of influences on the wellbeing of the inhabitants of our towns and cities and the interactions between those influences.
- The policy recognises the importance of bringing together multiple departments and coordinating the work of national, state, and local government, community groups and individuals.
- It recognises that management, programming and physical interventions in the fabric of our towns and cities all play a role in contributing to people's quality of life. Change needs to happen as much in people's hearts and minds as on the ground to embrace the opportunities and meet the challenges of a more sustainable future.
- It will help foster discussion by providing a definition of terms like liveability and equity in the Australian urban policy community. This will assist in discussions between professions and focus attention on the key issues and actions that will allow us to embed these concepts in our work.
- It makes an explicit connection between issues, challenges, specific actions and policies. This will assist the policy community to focus on the most efficient means to address urban problems. We contend a past lack of oversight, co-ordination and poor understanding of the implications of our actions has contributed to many of the problems we now face in our towns and cities.
- it provides a much-needed opportunity to consider not just the liveability of our towns and cities but also addresses the more profound question of their ongoing habitability. Issues like rising sea levels, extreme weather events, pollution and the urban heat island threaten lives and not just wellbeing.

Furthermore, we commend the recognition of the central importance of the quality of life offered by our towns and cities. We note this plays an important role in supporting our economic vitality and international competitiveness (OECD 2023).

We recognise that co-ordinating these different domains may raise significant challenges. It will require many downstream changes to policies and practices and the commitment of a wider range of skills and other resources to urban problems. This will be costly and disruptive in the short term but we suggest it will be worth it. Indeed, failure to do so will have far more significant consequences. It will diminish the chances that the inhabitants of our towns and cities can meet their needs, thrive and fulfil their potential. It will make our towns and cities less fit for purpose as the settings of commercial activity, health, education and culture. It will cast us all into an uncertain future, vulnerable to external threats growing in number, complexity and the risks they pose.

With this in mind, our submission provides a commentary on some of the issues relating to the policy. It presents some suggested amendments so that the admirable ambition of the policy may be achieved more swiftly and comprehensively.

The goals of the policy

We commend the policies acknowledgement of the inter-relationship between goals, challenges and objectives and that in many cases, addressing one goal in isolation may

positively or negatively impact the others (p17). We consider this to be an important strength of the policy and warrants further emphasis. We suggest it can do this by explicitly emphasising how actions can complement other goals.

We further note the historical tendency to see problems in isolation, typically from the perspective of a particular department with a narrow area of responsibility; usually planning, social services, utilities, etc. We see the resulting unintended consequences this has in other aspects of liveability every day. We further consider that avoiding these negative impacts and optimising the positive ones is an important goal of this policy and should be made explicit if we are to avoid action in one area eroding gains in another.

Furthermore, in keeping with our commitment to the Sustainable Development Goals and their underlying recognition of the inherent dignity of all people we consider that the goals of the policy should reference the equality of opportunity and facilitate expression and self-determination as critical components to liveability. The absence of these things limits people's quality of life and chances of fulfilling their potential (OECD 2023).

We further consider that this is an economic as well as moral imperative. In an increasingly globalised and online world productivity depends on attracting the talented and creative people essential for innovation (Investment NSW 2022). These people can go anywhere. To be competitive against competitor cities and attract this human capital our cities must offer a high quality of life (amongst other things). The OECD found that non-work and non-pecuniary drivers can be the deciding factors when considering employment options. They cite factors like social cohesion and the quality of public services (transport, health, and education), leisure activities and local cultural offerings as contributing to this appeal (OECD 2022). We note that many primary industry-dominated towns and cities all over Australia suffer dramatic boom and bust economic cycles that damage the economic and social fabric in both the boom and the bust phase. We consider that investment in these lifestyle factors can contribute to providing a more settled and diversified community.

We note the disadvantage that burdens so many urban Australians is concentrated in some areas. This diminishes health and wellbeing for those living in these areas (AIHW 2022). These areas often become stigmatised and their inhabitants are denied opportunities simply because of assumptions others make about people from that neighbourhood. This prejudice denies them access to important opportunities and equality of esteem, compounding their disadvantage and making intergenerational disadvantage harder to escape (Cobb Clark 2019). We further note research (Verdouw, J., & Flanagan 2019) that suggests that those trapped in such areas have fewer and weaker links to the wider community than those in more prestigious communities (Warr 2005).

We observe that communities that have had greater experience in responding to changing circumstances and exercising self-determination do better in difficult times than those that haven't (Ealy 2010). It is the adaptable that survive not the well-adapted, as the adage attributed to Charles Darwin has it.

To this end, we recommend the following change is made to the goals of the policy (p17-19):

1. the goals and objectives are graphically presented as a matrix with some cells populated by example actions to illustrate how actions can meet multiple goals and objectives.

2. A statement is added to the introductory text on p17 that the goals are best met by actions that demonstrably meet multiple objectives and reconcile potential conflicts.
3. The list introducing the factors that determine liveability should be amended as follows:
 - a. Opportunities for recreation, arts, sport, cultural connection, *expression* and social interaction
 - b. housing design, *location* and diversity
 - c. A new bullet point is added: *Realistic access to a range of transport modes*
 - d. A new bullet point is added:
Respect for valued landscape and built character.
4. The list introducing factors that can determine a city's equity should be amended to include two new points that state that factors that can determine a city's equity include:
 - a. *The geographic distribution of the determinants of health is uneven and can consign residents of some areas to poorer health and thus diminished quality of life and access to the opportunities of life.*
 - b. *Prejudices that become attached to particular areas can impact how other people see the residents of that area and the opportunities they are willing to extend to the people living in these disadvantaged areas and can deter investment in those areas*
5. The list introducing factors that determine productivity should be amended to include an additional point:
 - a. *Qualities that enhance liveability are central to attracting the creative, talented people essential to innovation who could choose to go anywhere.*
 - b. *Stability and confidence in an area's future encourage investment. Their absence discourages it.*
6. The list introducing factors that enhance resilience includes an additional bullet point:
 - a. *Past experience of working collectively to overcome challenges can assist people to respond to disasters*

The objectives of the policy

In relation to the section introducing the objectives (p21) we suggest the following changes in keeping with the commentary above:

1. In relation to Objective 1: No-one and no place left behind we suggest the text is amended as follows:
 - a. improve access to housing that is affordable *and is appropriately designed and located.*
 - b. *Appropriately designed and located* densification and infill development can also increase sustainability *and diminish vulnerabilities associated with car dependency*
2. In relation to Objective 2: All people belong and are welcome we suggest the text is amended as follows:
 - a. investing in sport infrastructure *and other community activities* can improve social cohesion and a sense of belonging in communities.
3. In relation to Objective 3: Our urban areas are safe we suggest the text is amended as follows:

- a. Urban safety encompasses *reducing the risk and impacts of accidents*, inclusivity and crime prevention strategies while enhancing climate resilience and disaster preparedness
 - b. Cities must also *address air and water quality* and climate challenges, such as flooding, *wildfire and the urban heat island effect* through improved planning, infrastructure standards, and urban design.
 - c. A new bullet point is added: *cities must move to intrinsically safer modes of transport where possible.*
- 4. In relation to objective 4: Our urban areas are sustainable we suggest a new sentence is added at the end of the introductory text:
 - a. *Keeping urban areas compact can help support food security and retain natural values.*
- 5. In relation to objective 5: Our urban environments and communities promote health and wellbeing. We suggest the introductory text is rewritten as follows:
 - a. Urban areas must support healthy, active lifestyles through access to green and blue spaces, high-quality housing, and active transport options *as well as programming of public space to facilitate communal activities and events that provide opportunities for participation and expression.*
 - b. *Enhancing tree canopy and vegetation cover can make cities healthier and reduce the growing impacts of the urban heat island effects.*
- 6. In relation to objective 6: Our urban areas promote productivity we suggest another sentence is added to the end of the introductory text
 - a. *Competing for the talented and creative people essential for innovation will require that our towns and cities offer a competitive standard of liveability with other magnet cities.*

Challenges and Possible Actions for each objective

In relation to the more detailed articulation of the objectives (p 22-43) we commend the identification of challenges and possible actions in the policy. This will assist the policy community in focusing on the most effective ways to address urban problems and illustrate the link between issues and appropriate action. However, we consider that the case for the suggested actions might be enhanced by explicitly emphasising how actions contribute to meeting multiple goals and address multiple issues. For example, in the Netherlands the creation of a new type of street known as ‘Woonerfs’ or ‘living yards’ allowed these streets to be experienced not just as mono-purpose conduits for vehicles but instead as multi-purpose spaces, contributing to liveability in many ways. This included providing a slow-speed environment for vehicle drivers and a high amenity, safe, social and play space for local residents. This also can help ensure these streets are a better setting for water-sensitive urban design and offer enhanced tree canopy to make these streets safer, more pleasant, less polluted and more resilient to climate change.

We believe articulating these potential additional or subsidiary benefits made possible by the actions in the policy can help make a compelling case for these actions.

We suggest the following specific changes are made to the policy:

No-one and no place left behind

We share the conclusion made by Pickett, K., & Wilkinson, R. (2010). that poverty hurts the poor but inequality hurts everyone. We also note that the dramatic boom and bust economic cycles that characterise many primary industry dominated towns are socially damaging in all phases of the economic cycle. We suggest the key urban challenges discussion for this objective would benefit from additional bullet points highlighting the imperative to address the difficulties arising from our society's changing makeup and inconsistent and unreliable pulses of investment. To this end, we suggest the following is added to the list of challenges:

1. *Changing demographics: the changing social make-up, reduced household size and ageing population of Australian urban areas are rapidly changing the demands placed on our cities to meet people's needs. This is increasingly challenging for those less well-off in our urban communities who are less able to compete for appropriate, well-located homes.*
2. *Boom and bust economic cycles: the unreliable economic base of many primary sector orientated towns and cities often contributes to a perception they are not seen as attractive places to settle or invest. This consigns their long term inhabitants to periods of rapidly rising prices and housing shortages alternating with stagnation.*

The following amendments would enhance the Possible Actions for this objective:

3. Under the action starting 'update land use planning systems to accommodate a greater mix of housing and higher-density housing in well-located areas...' an additional sentence is added stating: *Enhance design capacities to address the conflicts that can arise from this intensification to retain and enhance urban amenity, valued character, improve canopy cover and minimise community resistance and distress.*
4. Under the bullet point 'Collaborate with state, territory and local governments and community organisations' we suggest the following additional second-level points
 - a. *Co-ordinate actions to renew and revitalise stigmatised neighbourhoods.*
 - b. *Co-ordinate action to facilitate diversification and increase long-term confidence in investing primary sector dominated towns and cities.*

All people belong and are welcome

We welcome the emphasis the policy puts on ensuring equal access to the opportunities of urban life. However, we believe the following amendments would further focus attention on the key challenges and actions:

1. In the introductory, italicised text for this objective we suggest the following amendments are made: We will promote equitable access to sport precincts *and other shared recreational facilities* in our urban areas and foster a sense of belonging in our communities.
2. In the Possible Actions for this objective we suggest additional actions :
 - a. *Engage local communities to understand the social landscape of hopes and fears and shared values. Use this understanding to ensure planning and design is responsive to both the social and physical surroundings.*

- b. Support opportunities for people to participate in community activities through placemaking activities*

Our urban areas are safe

We commend the emphasis on safety. We note a sense of safety is an essential pre-condition if we are to meet our other needs. However, we suggest that safety means little without security; the ability to live life without care and freedom from the weight of concerns that blight other aspects of our lives and diminish our ability to meet the full range of our needs. We further observe that this reflects the UN's articulation of safety fitting within a broader framework of 'human security' (UN, undated).

Consequently, we suggest the following amendments:

1. The objective is better defined as *Our urban areas are safe and secure*

The introductory text is amended thus:

2. Urban environments should be safe for all. This includes creating inviting spaces *where accidents and crime are reduced, particularly for marginalised groups and others sensitive to the fear of accidents and crime.*

The following amendments would enhance the Possible Actions for this objective:

3. Inclusivity and safety in public spaces: Urban areas must be safe and inviting, promoting participation of people of all ages, cultures, abilities, genders, religions and *economic and social* backgrounds. Accessible, *appealing* and safe public spaces are vital for community wellbeing.
4. In relation to the discussion section for this objective, we consider that the observation made in the policy that 'An increasingly important aspect of safety in Australian cities is resilience to the impact of weather-induced hazards like flood and bushfire' (p29) would be enhanced by making a specific mention of the urban heat island effect given the urban focus of this issue and the increasingly pressing risks it poses to human safety.
5. In the possible actions for this objective, under the bullet point 'collaborate with state, territory and local governments' we believe additional second-level bullet points should be added:
 - a. Extend tree canopy and vegetated surfaces over more public space to minimise the risks posed by the urban heat island effect.*
 - b. Prioritise investment in intrinsically less dangerous modes of transport considering accidents, pollution and impact on climate change.*

Our urban areas are sustainable

We fully support the emphasis on greater urban sustainability. We consider that achieving this requires challenging the entrenched market preference for housing and neighbourhoods that aggregate to create low-density 'sprawling' suburbs and mono-function streets. As such the national urban policy should seek to sway the market towards well-designed, needs-responsive dwellings and transport options if people are to readily take up and demand these more sustainable housing types, neighbourhoods and behaviours.

We further observe the imperative to increase comfort in the public realm if we are to ensure active transport is competitive and minimise the risk of heat stress to human health and the health of the wider biological community.

To this end, we suggest the following amendments:

1. The key urban challenges include additional bullet points:
 - a. *Market resistance and limited capacity: Future proofing our cities will require a significant diversification of our housing stock and a parallel increase in the market appetite for more compact, urban dwellings. Achieving this will require a broadening of design skills in the development and planning industry to facilitate sensitive and appropriate densification, greater building skills for different typologies and a coordinated 'hearts and minds' strategy to draw the market's attention to new housing types and ways of living.*
 - b. *Urban/rural interface: much of our most productive farmland surrounds our major urban areas. Maintaining the capacity of this farmland to support food security will require careful management of the urban/rural interface and careful planning of the peri-urban area.*

In relation to possible actions:

2. Under the bullet point Invest in sustainability initiatives we suggest the following amendments are made:
 - a. amend the action as indicated: planting *and managing* trees and other vegetation to provide cooling and shading
 - b. another secondary level point is added: *Facilitate people to support greater ecological health by increasing capacity to make informed choices about the use, management and landscaping of private and shared land*
 - c. another secondary level point is added: *Support community groups to participate in retaining and enhancing natural values.*
3. Under the bullet point 'Collaborate with state, territory and local governments, to:' we suggest another secondary level point is added
 - a. *Provide a strategy to address interface issues between urban and rural areas in the peri-urban issues*

Our urban areas and communities promote health and wellbeing

We commend the recognition implicit in the title of this objective that health has personal, social and physical determinants. An important example of this is the impact that a perceived lack of safety has in deterring healthy behaviours. This perception is impacted by physical characteristics such as lighting, proximity to sources of danger, such as traffic, personal factors such as age and gender and social factors such as cultural expectations and personal experience.

We also consider that the increasing risk of climate change requires greater emphasis, particularly relating to the urban heat island effect. Pollution also requires greater emphasis as we face the increasing challenges of population growth and the intensification of our towns and cities. Research from UNSW found that 'Reducing air pollution is one of the best investments for Australians' health, the environment, the economy and social equity' (Smith 2023)

To this end, we suggest the following changes:

1. In relation to the challenges for this objective we suggest that the following challenges are added;
The importance of the qualitative aspects of people's surroundings: people always have a choice and are subject to many influences that encourage or deter social interaction or physical activity. Encouraging people to be active, engage with others and so enjoy all the benefits that come from that requires designing places that make healthy activities relatively more appealing than less healthy, solitary, sedentary alternatives.
Recognition of the impact of contaminants on health and wellbeing: Excess light and sound has been identified as an endocrine disruptor and impacts on heart health (Victor Chang Institute 2023). Exposure to fine particulates worsens asthma, increases hospital admissions, incidences of heart attacks as well as premature death from heart or lung diseases, such as chronic bronchitis (also called chronic obstructive pulmonary disease or COPD) (NSW undated).
2. In relation to possible actions we suggest additional bullet points stating:
 - a. *Support higher design standards of public spaces to ensure they are relatively more inviting for a wide range of activities and as a setting for interaction.*
 - b. *Support increases in tree canopy and vegetation cover to mitigate the anticipated increase in the urban heat island effect and assist filtering air borne contaminants.*

Our urban areas promote productivity

We fully agree that government policies and resources can help provide a more conducive environment for people to conduct business and for that business to better nurture communities. We further note and support the increasing importance placed on human capital in an increasingly globalised world. To this end, in keeping with the commentary above we suggest the following changes:

The introductory text incorporates the following:

1. *Ensuring restorative environments and opportunities to escape stresses can be easily accessed with minimal opportunity cost can play an important role in diminishing the burden of stress on our bodies. This is a recognised cause of ill health and a major break on productivity (Bui 2021).*

The challenges incorporate two additional challenges:

2. *Uneven distribution of confidence: Towns and cities that rely on one or two industries with irregular peaks and troughs such as is typical for mining towns often do not engender confidence in long-term stability necessary to attract investment.*
3. *Competitive liveability: attracting the human capital that is at the heart of competitiveness and productivity in an increasingly globalised market requires investment to maintain and enhance a high standard of liveability. A high level of natural assets, social cohesion, public services (transport, health, and education), leisure activities and local cultural offerings contribute to liveability.*

In relation to the discussion we suggest the following text is added:

The Productivity Commission's first 5-yearly review 'Shifting the Dial' was published in August 2017 and put forward several recommendations for how governments can positively influence productivity. This included improving the functioning of towns and cities by improvements to public infrastructure, road funding and investment, planning and land use policies and access to housing. It also recommended making governments work more effectively through better intergovernmental relations and developing stronger policy development and delivery capabilities,

Principles

Given the scarcity of land and the diverse calls on it to meet a wide range of functions if it is to meet our needs we suggest the list of principles is amended to prioritise actions that meet primary, secondary and other goals wherever possible. This is necessary to ensure our diverse needs can be met efficiently. To this end we suggest the following amendments:

In principle 2. Placemaking has both physical (hardware) dimensions and programmatic (software) dimensions. Both are required to engender changes in behaviour and attitudes necessary to turn a 'space' into a 'place', with meaning to a community. To this end we suggest an additional bullet point:

- 1. Co-ordination of the design, programming and management of shared space to optimise the opportunities it presents for interaction, recreation and as generator of identity and belonging*

In principle 3. Urban development should actively improve social, environmental and economic outcomes. We suggest an additional bullet point is added that states we must...

- 2. enhance design standards to ensure interventions can serve multiple purposes safely and without conflict.*

In principle 5. We fully agree in the importance of ensuring policy has firm foundations in evidence. We note that its absence or lack of confidence in the evidence we have is a constraint on policy development and action. We further note that evidence is most patchy in remote and less well-resourced areas. To this end we suggest an additional point that states we should inform future changes and drive improvement and innovation, especially through

- 3. Seeking to prioritise the evidence deserts that have hindered the development of effective policies*

In principle 5. Fair and inclusive development builds equitable communities. We strongly support the list that starts 'we must prioritise' and suggest this may be further strengthened by an additional bullet point that states: '

- 4. planning instruments and practice must ensure all sections of urban communities enjoy the invitations to be active and engage with others that come from a high standard of urban amenity.*

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