



Your ref:
Our ref:
Enquiries: Nicole Lucas-Smith
(08) 65519463

Lisa Rauter PSM
First Assistant Secretary – Partnerships and Projects
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
Via email to: PMM@infrastructure.gov.au

Dear Ms Rauter

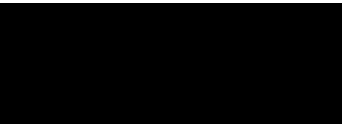
DRAFT NATIONAL URBAN POLICY - SUBMISSION

Thank you for providing the Western Australian Planning Commission with an opportunity to make a submission on the Draft National Urban Policy (Draft Policy). Congratulations are extended to the Commonwealth Government on reaching this milestone. The potential impact of the Draft Policy in the growth of cities and suburbs across the states and territories could be extensive.

The Draft Policy has been considered against the Western Australian Planning Framework, including policies and strategic land use and infrastructure plans. I am pleased to advise that, largely, there is alignment between the goals, objective and principles in the Draft Policy and our existing Framework.

The key issues highlighted in the review of the Draft Policy related to three key categories, including: vision statement, clarity and consistency, and implementation. Grouped under these themes a table has been attached documenting the key issues that we request are given further consideration prior to the finalisation of the Draft Policy.

We encourage on going collaboration with the Department of Planning, Lands and Heritage, as you progress the finalisation of Draft National Urban Policy. Should you have any queries, please contact Nicole Lucas-Smith, Planning Director – Planning Projects on phone (08)65519463 or via email to Nicole.Lucas-Smith@dplh.wa.gov.au



David Caddy
Chairman
28/06/2024

Attached – WAPC Submission on the Draft National Urban Policy

ATTACHMENT: WAPC Submission on Draft National Urban Policy

Category	Comment
Vision Statement	Encourage the development of a clear and concise vision statement. Also acknowledge that the statement will need to be high level to be able to address a range of urban city challenges across states and territories.
Urban Growth	Support a strategic systems approach to strategic land use and infrastructure planning.
Urban Growth	Goals, Objectives, Principles are broad to capture a range of growth scenarios in urban cities and suburbs, however, this does open itself up to a range of interpretations.
Urban Growth	Encourage consideration of greater emphasis on employment opportunities
Urban Growth	Encourage exploration of potential spatial plans for urban cities with key infrastructure.
Clarity and Consistency	There are several terms within the Draft policy, which could benefit from a consistent definition across jurisdictions, especially if any monitoring or reporting is to occur against the terms. The terms include, but are not limited to: Affordable housing, Well-located housing, Resilience, Climate mitigation, Accessibility
Implementation	A clear implementation framework be established, with an indication of resourcing implications for states and territories
Implementation	It is unclear whether Appendix A – Principles is part of the implementation framework.
Implementation	The Principles outlined in Appendix A appear to be much more specific than the Draft Policy, which lends itself to elevating it to within the Policy goals – objectives sections.
Implementation	<p>A number of references in the Principles, such as restricting development to the current urban footprint, raises a number of issues such as:</p> <ul style="list-style-type: none"> • What timeframes is the policy applicable for? • What are the implications of not adhering? • What if there is a conflict with other agreements with states and territories (ie. National Planning Reform Blueprint and Housing Accord 1.2 million additional dwellings)? <p>Suggest, that criteria is established, or additional words inserted within the documentation that provides for states and territories to make these decisions aligned with their legislative framework and strategic land use plans.</p> <p>An alternative to this, would be encouraging strategic plans to be kept contemporary, which is aligned with recently implemented Western Australian planning reforms which requires strategic plans to be regularly reviewed.</p>

Implementation	A clear implementation framework needs to be developed for further collaboration with states and territories. The lack of clarity and potential implications cannot be adequately considered in the absence of an implementation framework.
Implementation	It is unclear how Draft Policy relates to other Commonwealth initiatives, including policies and funding. For example: National Adaptation Plan, Regional Vegetation Planning under the Nature Positive Policy.
Implementation	It is unclear what Draft State of the Cities is reporting on, and how this will be used as part of the implementation.
Implementation	When considering implementation, consideration should be given to how it will be transitioned, and how long the policy will be applicable, and/or it will be reviewed.
Implementation	Regulatory changes (and policies, including reviewed policies) usually require some level of economic assessment before being considered, is there an opportunity here to have regulatory change processes improved in states and territories by requiring regulatory impact statements to go beyond considering the economic impact, but also environmental and social impact. A potential model would be Better Regulation Victoria that provides independent advice to Government on improving Victoria's regulatory performance and its 'Victorian Guide to Regulation' publication that explains the Victorian Government's approach and requirements for impact analysis.