

04 July 2024

Jo Hutchinson
Acting Assistant Secretary
Cities and Suburbs Unit
Department of Infrastructure, Transport, Regional Development, Communication and the Arts
urbanpolicyinput@infrastructure.gov.au

Dear Ms Hutchinson,

Subject – Submission to National Urban Policy Consultation Draft

Thank you for the opportunity to make a submission to the *National Urban Policy Consultation Draft*. This is a submission from the Western Sydney Planning Partnership (WSPP), and is provided as a draft, subject to endorsement by the WSPP Executive Group at its August meeting. Please note the submission is an expert submission by the WSPP, which is engaged in planning and delivery in a metropolitan growth region of national significance, to assist in the refinement of the National Urban Policy and is not a representative view of any individual partner organisation. The submission is confidential until approved by the Partnership Executive Group.

WSPP commends the Australian Government for preparing a National Urban Policy Consultation Draft and a vision for sustainable growth in our cities and suburbs. The over-arching goals and objectives to enable urban areas to be liveable, equitable, productive, sustainable and resilient are also commended. Much has changed since the last National Urban Policy was released in 2011, particularly in the fast-growing region of Western Sydney, and WSPP recommends that an updated policy is required to reflect the substantial societal, economic and environmental changes that have taken place in the last thirteen years.

In this period there has been major infrastructure investment from the Australian Government in Western Sydney under the City Deal Agreement, which envisaged a long-term financial commitment and inter-government coordination to catalyse urban transformation, and positively extended the Australian Government's approach by connecting with a key growth region such as Western Sydney. A lesson from the City Deal is the importance of place-based approaches and spatial integration, across the three levels of government, as an underlying principle for better engagement with cities. For the new National Urban Policy to be effective it is recommended the Australian Government continue to engage spatially and continue facilitating the transformation of nationally significant growth regions such as Western Sydney, and develop agreed long-term implementation plans for these regions in any final National Urban Policy.

The following submission provides a contribution to the refinement of the National Urban Policy Consultation Draft based on the experiences of WSPP in the partnership engagement with the Australian Government in growth management and transformation of the Western Parkland City of Sydney.

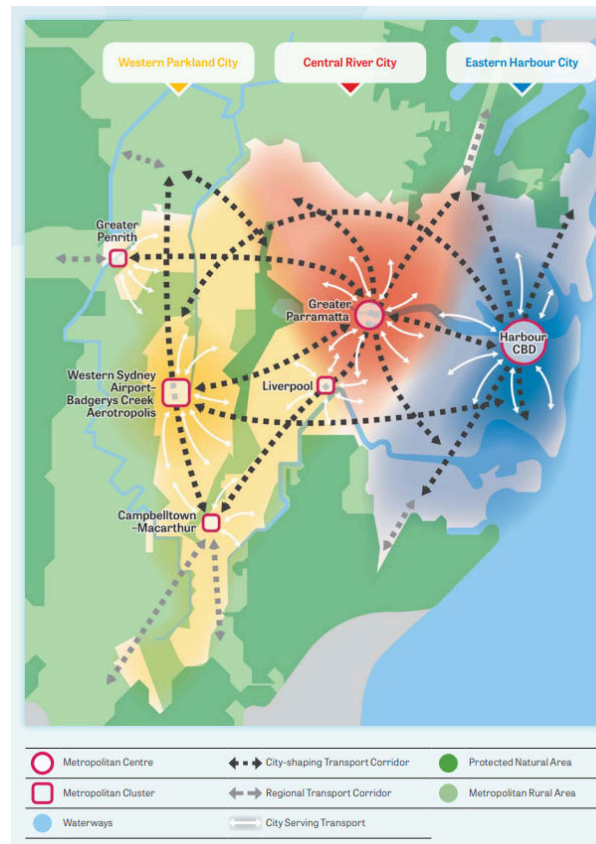
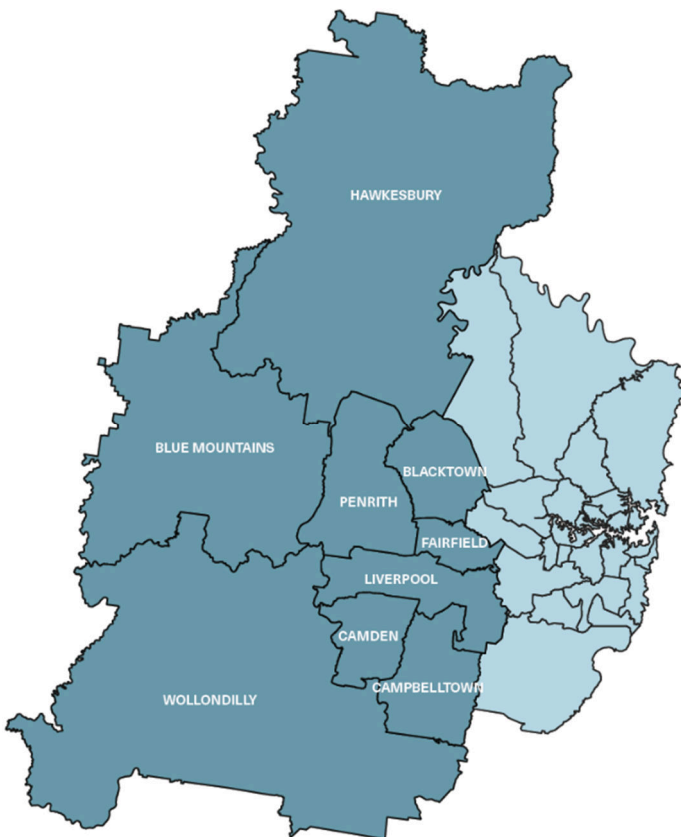
Background

The WSPP was established in 2018 as a key initiative of the Western Sydney City Deal. It is a partnership between local governments and NSW government agencies that facilitates the transformation and growth of the Western Parkland City of Sydney and delivers efficient and high-quality planning outcomes for local communities.

The vision for WSPP is to create great outcomes for Western Sydney communities through innovative and collaborative strategic planning and project delivery.

WSPP's local government members include nine local government areas: Blacktown, Blue Mountains, Camden, Campbelltown, Fairfield, Hawkesbury, Liverpool, Penrith and Wollondilly. WSPP's target region experiences and will continue to experience high growth over the next 20 years, with the region projected to grow by 477,000 additional people, to a population of over 2 million people by 2041.

Western Sydney covers a vast, varied and rapidly changing area of the Sydney Metropolitan Area, including Australia's largest development front (72km) incorporating the North West, South West and Macarthur growth areas and established metropolitan centres including Penrith, Campbelltown, Liverpool and Blacktown. The region is also the location of the under-construction Western Sydney International Airport, the associated 'Aerotropolis' employment precincts and the planned new metropolitan centre of Bradfield. Being in an outer metropolitan area, the region is framed by significant peri-urban LGAs featuring both agricultural and rural landscapes and communities as well as natural landscapes and protected areas (including the Blue Mountains and World Heritage Area).



Planning Partnership region, and Metropolis-of-Three-Cities-Plan

The Western Sydney City Deal signed in 2018 set out a vision for and the commitment of the Australia Government, NSW Government and 8 local governments to deliver on the infrastructure and coordination required to plan for this rapidly growing city and to utilise significant transport investment as a catalyst to transform the urban structure and urban growth model. Delivery of this vision will require coordinated efforts by all three levels of government across a long timeframe for the vision to be realised.

Submission

Issue 1 - Definition of Commonwealth interests in urban areas: The National Urban Policy Draft (NUP) presents principles/aspirations for good urban planning.

A better approach would be for a NUP that identifies the key areas where, in partnership with state and local government, a Commonwealth Government role will be essential to deliver transformation of cities.

For example:

- the Commonwealth role in city shaping transport investment (and working with state/local government long- term to obtain the best value from this investment)
- the Commonwealth role in adaptation of cities to climate change
- the Commonwealth role in addressing inequality in cities with spatially targeted strategies that address severe social disadvantage as well as housing-related policies including the financing of social and affordable housing, and
- The Commonwealth role in achieving productivity improvements such as, for example, ensuring digital accessibility for the creation of smart cities and the decentralisation of employment within metropolitan areas, including for knowledge sector jobs.

For Western Sydney, the continued engagement from the Commonwealth into key thematic areas commenced in the City Deal would be valuable, particularly continued long-term investment in transport infrastructure to support growth.

Issue 2 - Accompany policy with a spatial approach: A National Urban Policy should be accompanied by a greater focus on the spatial implications and priorities nationally for cities, and targeted support for implementation of strategic plans developed by state and local governments. This should consider the location and future growth of Australia's urban areas, with a particular focus on definition and focus on 'nationally significance growth regions' and seek to facilitate the broader range of policy that plays a key role in place-making and city-shaping.

Whilst the NUP discusses a number of these topic areas, WSPP recommends inclusion of a much more comprehensive, holistic and spatially targeted approach be developed (including nationally how major urban areas are being planned, and key areas for Commonwealth engagement over the next 20 years).

Issue 3 - Integrated urban policy with infrastructure investment policy: The NUP is separate from the Australian Government Infrastructure Policy Statement, which sets out the investment priorities for land transport infrastructure.

There is a critical role for the NUP in developing a framework for reforms for improved transport and land use integration for cities nationally, as a key part of achieving transformation of Australian cities. This is important for the long-term transformation of Western Sydney where there needs to be a continued focus on the delivery of transport infrastructure to support nationally significant growth, but also development of greater integration between transport investment by the Commonwealth to achieve long term city shaping land use change.

Issue 4 - Developing a detailed implementation plan: The current draft of the NUP document is at a principles/aspirational level and does not yet have an effective spatial framework to define possible actions. The level of detail planned for the final document is not clear, and the possible actions need to be further developed into clear actionable items and accountabilities included. This could occur via an action/implementation plan to be set up as a result of the NUP and include a monitoring framework considering how progress will be measured. At this point, the National Urban Policy proposed actions do not appear to be well-developed or relate effectively to Western Sydney as a nationally significant growth region, and the development of region-specific actions and commitments from the Commonwealth would provide a better approach.

Issue 5 - Collaborative governance: The document lacks a strong framework for collaborative governance partnerships needed for cities and nationally significant growth regions. An effective framework for NUP governance requires collaboration between many actors, including governments and communities for regions and places to deliver outcomes.

While state and local governments are the leads for the planning of urban areas, where rapid growth is occurring, the opportunity to collaborate directly with the Commonwealth to share knowledge about planning challenges and develop potential solutions is of considerable value, as has been shown through the Western Sydney city partnership. Incentivising and in some cases engaging directly in collaborative governance arrangements, even if limited to a tri-partite governance arrangement, is valuable and a potentially a key tool for the Commonwealth to implement National Urban Policy.

The strategic partnership between the Commonwealth, NSW government and 8 local governments in Western Sydney, established in 2018 as a 20-year vision for Western Sydney, included collaborative governance arrangement and were a tested model and could be a useful case study in evolving a model that can be applied more comprehensively. While it is acknowledged that a national approach would need to be considered, the development of a collaborative governance model for planning engagement embedded in the foundations of the National Urban Policy would be a key element to further investigate.

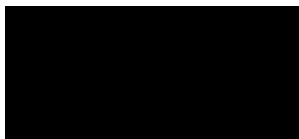
Issue 6 - Need for detailed evidence base and definition: The document is a high-level policy document and includes a very limited snapshot of the State of the Cities report. The NUP should provide clear links to the State of the Cities but should also include further detail and development of the evidence base that has been used to develop the principles. The document, via a strategic evaluation undertaken of the NUP, could also outline the alternative approaches the Commonwealth considered for developing the NUP, as well as the role for the Commonwealth in cities that has been considered.

Issue 7 - National Urban Policy goals: Part 3 sets out the five key goals for urban places: Liveable, Equitable, Productive, Sustainable, and Resilient. The WSPP recommends that the Commonwealth reconsider this approach and instead use the NUP to better define the role and areas of focus for the Commonwealth in urban areas, as the basis for partnerships to be established to deliver on these areas.

However, if the approach to identifying principles of good urban planning were retained, WSPP is supportive of the overall goals, noting that an additional 'Connected' goal may be suitable to include. This could encompass the important role of infrastructure and transport connectivity, digital connectivity, as well as social connectivity. Connectivity is a key objective in Western Sydney.

Thank you for the opportunity to contribute to the development of a National Urban Policy through commenting on a Consultation Draft. WSPP looks forward to seeing the continued development of the policy and is able to provide further input if this is required. Please contact me by email to nichollsl@ppo.nsw.gov.au if you would like to discuss the details in this submission further.

Sincerely,



Luke Nicholls
Executive Director
Planning Partnership Office