Town & Country Planning Association Inc. ***(Reg. No.:A0031095J)***

Submission to the Invitation for Public Comment on the
Draft National Urban Policy

The Town and Country Planning Association Inc. (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The TCPA is a non-profit public organisation, established in Victoria in 1914, and is independent of any party political organisation.

The TCPA has made many submissions to State and Commonwealth planning and environmental approval processes and to parliamentary inquiries, including written and verbal submissions to the House of Representatives Standing Committee on Infrastructure, Transport and Cities – ***Inquiry into the Australian Government's role in the development of cities*** (2017-2018).

In preparing this short submission to the ***Draft National Urban Policy*** (Draft NUP), the TCPA considered:

- The following documents prepared jointly by the Rail Futures Institute Inc. (RFI) and the TCPA
  - ***Rail as a Catalyst for Regional Growth*** (January 2022). Summary and Full Reports are accessible via *https://tcpa.org.au/publications/tcpa-reports/*
  - ***Growing Victoria's Regions*** (July 2024) (*See* ***Attachment 1***)
- ***State of Australia's Regions 2024*** (SOAR 2024), February 2024, Australian Government, Canberra, accessible via *https://www.infrastructure.gov.au/territories-regions-cities/regional-australia/state-australias-regions-report*
- ***Intergenerational Report 2023 Australia's future to 2063*** (IGR 2023), August 2023, Australian Government, Canberra, accessible via *https://treasury.gov.au/publication/2023-intergenerational-report*
- ***Australia State of the Environment 2021*** (SoE 2021), Australian Government Department of Agriculture, Water and the Environment, Canberra, accessible via *https://soe.dcceew.gov.au/*
- ***Building Up & Moving Out*** (September 2018), the final report of the House of Representatives Standing Committee on Infrastructure, Transport and Cities *Inquiry into the Australian Government's role in the development of cities* to the Parliament of the Commonwealth of Australia, and the associated Government Response dated May 2020.
  The report, its associated Government response and all submissions are available on the Inquiry website:
  https://www.aph.gov.au/Parliamentary_Business/Committees/House/Former_Committees/ITC/DevelopmentofCities/Report
- ***State of Australian Cities 2013*** (SOAC 2013), Australian Government Department of Infrastructure and Transport, Major Cities Unit, Canberra, accessible via *https://web.archive.org.au/awa/20141215033444mp_/http:/www.infrastructure.gov.au/infrastructure/pab/soac/files/2013_00_INFRA1782_MCU_SOAC_FULL_WEB_FA.pdf*

1. Introduction

The Draft NUP presents a positive, much needed, national approach to the planning and management of our cities and towns. It is heartening that the Australian Government remains committed to the new Cities and Suburbs Unit and to establishing the Urban Precincts and Partnerships Program, the Thriving Suburbs Program and the Regional Investment Framework.

Some older Australians may be reminded of the initiatives of the 1970s Whitlam Government, which created the then Department of Urban and Regional Development, the Cities Commission and several regional development authorities, recognising that planning of cities and regions to accommodate a population of 13.5 million was an urgent national issue requiring co-ordinated policies, programs and financial support. It is unfortunate that the level of interest and involvement of successive governments has not been continuous.

Now, fifty years on, the population has doubled, significant investments have been made linking urban centres across the country and the impacts of climate changes are more evident. All these issues are more extensive, more complex, more interrelated and, seemingly, many times more urgent!

The Draft NUP is well structured. It:

- Sets out formal roles and responsibilities for the Australian, state and territory, and local governments, and anticipates roles for the private sector, as well as the participation of community groups and individuals (particularly in the planning and development phases, and in building support for urban planning initiatives).
- Then details the Australian Government's Goals and Objectives, followed by appendices outlining a set of Principles and a table of many national initiatives underway.

TCPA supports this approach, including the guiding Objectives and Principles. However, there are some points that we feel need further comment.

2. Consultation process

Participation of Professional Organisations

In the section on Urban roles and responsibilities, the participation of not-for-profit professional organisations, such as the TCPA, is not specifically mentioned. It is hoped that peak bodies include the Planning Institute of Australia (PIA), the Regional Australia Institute, Australian Airports Association and Australasian Railways Association.

However, given the expert knowledge and experience that is held within organisations such as ours, we are hopeful that there will be opportunities to provide relevant inputs to the development of policies, programs and initiatives. (See ***Attachment 2***)

3. Consultation sessions – Matters arising

TCPA members and supporters took part in consultation sessions on 11 June and 1 July 2024. Discussions included a wide range of issues

The term "Settlement" needs to be clearly defined.

The term as used by the Commonwealth is different from that commonly used in the urban planning context globally. This mismatch is creating confusion.

- The Commonwealth seems to limit the term to the migration from overseas into Australia. Questions that related to the need for a national settlement policy or plan (as PIA and TCPA advocated in submissions and presentations to the *Inquiry into the Australian Government's role in the development of cities*) were deflected as "something for the Department of Home Affairs". Even in SOAR 2024, this limited definition applied, with commentary on visa types for immigration programs.
- In the urban planning context globally, "settlement" refers to the distribution of urban populations. Typically, settlements are either urban or rural.
  - *Urban settlement* can be described as a densely populated settlement, which can be a town, city, metropolis, conurbation, megalopolis, or world city.
  - *Rural settlement* describes a group of houses in the countryside, which can be a dispersed settlement, a hamlet, or a village.
- Even United Nations *Sustainable Development Goal (SDG) 11: Sustainable cities and communities* refers to "cities and human settlements".

TCPA submits that this matter needs to be resolved prior to finalisation of the NUP.
In the meantime, our submission with use the following term – "National Settlement/Population Distribution Strategy".

UN Sustainable Development Goals are focused on big cities

The Draft NUP reads as a "Big Cities" report. While consultation sessions acknowledged the need address regional cities and towns, there are UN Sustainable Development Goals (SDGs) that are of significance to regional areas, particularly around water supply and energy.

As SDGs are applied across all tiers of government with differing lead agents, there needs to be a governance framework describing how the various lead players will interact with interested parties on achieving positive urban outcomes against all the SDGs and how success would be measured.

TCPA recommends that

- Reference be made to *SDG 6: Clean water and sanitation* and to *SDG 7: Affordable clean energy*.
- CSU and Planning Officials Group develop an appropriate governance framework.

The NUP should feed into other government policies and documents.

The NUP should always drive the SOAC reports as well as the urban sections of other reports, such as IGR 2023, SOE reports, SOAR reports and their associated programs. Data from these reports should be used to inform future NUP editions.

The way the Draft NUP is structured, it reads as if it were intended to be subservient to the SOAC. We were left with the same impression during the consultation presentations. This should never be the case.

Ongoing community engagement is needed to understand the future.

In many cases this fails because it is seen as a "token" gesture to justify a predetermined decision. For genuine consultation and to really engage with the community, we need visions and images (together with commitments) to understand what the future could look like.

- IGR 2023 considers a 2063 time horizon. This might be the place to start when managing ongoing community engagement.

4. Australia's Urban System

The Draft NUP needs to consider Australia's urban system more broadly addressing not only the state of play today, but now and into the future (2063 as in IGR 2023):

- The hierarchy of centres within that system, –
- The differences between metropolitan/major cities and regional cities
- Population distribution that includes both internal/domestic migration and international migration and settlement
  - COVID showed us that Australians can be quite footloose when they choose, particularly with remote working – allowing housing location to be influenced by lifestyle and affordability
- Connectedness between urban centres, particularly where transport investments can significantly improve travel times/frequencies and contribute to regional outcomes:
  - E.g. UK's High Speed Rail 1 projects and its impact in Kent which repaid the capital investment within 10 years due to its economic benefits that flowed to cities and towns in the region.
- Alternatives to incremental growth of urban centres. Could new cities be built as an alternative to incremental growth of settlements of all sizes?
  - It is conceivable that a new city could be built around an existing village/hamlet/small town in such a way that the existing community is not disturbed, by making it a self-contained neighbourhood or district within the larger new city. In the UK, the English garden cities of Welwyn and Letchworth were built in this way.
  - At Welwyn, the existing village was left untouched, while the new town was build alongside it, with a small wedge of open country between them.

- At Letchworth, the original village was absorbed into the new town.
- This approach could be taken (for example) in Wallan on Melbourne's northern metropolitan fringe.

5. Areas where Commonwealth has leverage

The NUP implies that the Commonwealth has little leverage on urban planning. This is only partially true. Areas where Commonwealth has considerable interest and it has been able to strongly influence urban form include:

- Airport development for those federally-leased airports subject to the *Airports Act 1996 (Cwth)* – in Victoria Melbourne, Essendon Fields and Moorabbin. Urban development and increasing encroachment in the vicinity of several Airports Act airports lead the Commonwealth to engage with States and Territories to prepare the ***National Airport Safeguarding Framework*** (2012) (NASF).
  - The NASF and its associated guidelines address not only on- airport issues, but also urban development outcomes across urban areas – even up to 20 – 30 kilometres away from the actual airport. It applies to all airports, Military airfields and aerodromes across Australia. *https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework*
    The NASF was agreed to by Commonwealth, state and territory transport ministers at the meeting of the then Standing Council on Transport and Infrastructure in May 2012. Each jurisdiction is responsible for implementing NASF into their respective planning systems. For Victoria, this is outlined at *https://www.planning.vic.gov.au/guides-and-resources/guides/all-guides/airports*
- National Land Transport Network - impacts of its corridors on and interfaces with urban communities
- Cross border communities
- Areas of national economic interest, e.g. Green Triangle
- Environmental and heritage assessments under EPBC Act processes

6. Integration of urban and rural planning with transport planning across all three tiers of government

Regional Growth

In relation to Objective 1 *"No-one and no place left behind"*, we wish to draw particular attention to the imbalance in population and economic growth, between the big cities and the regional areas, that has developed as a result of unchecked free-market forces.

- In Victoria, in the years prior to the COVID-19 pandemic, Melbourne's share of the state's annual population growth reached 85%, and the regions were 'left behind' as their share of growth fell to 15%.

The experience of frenzied growth in the big cities (contributing to urban sprawl, increased traffic congestion and unaffordable housing) but low population growth in the regions (resulting in limited access to services, loss of local skills, vulnerability of local businesses and ongoing socio-economic disadvantage) is not confined to Victoria.

One positive effect of the COVID-19 pandemic has been an increased interest in regional living, partly fostered by the widespread use of technology for working from home.

Nonetheless, the systemic disparity described above will continue indefinitely unless there is concerted, co-ordinated action at all three levels of government to bolster, incentivise and support regional growth - through a range of initiatives including investment in regional infrastructure and services.

- **Role for improved public transport to boost regional connectivity and development.**

In *Rail as a Catalyst for Regional Growth* (2022) and *Growing Victoria's Regions* the Rail Futures Institute (RFI) and TCPA have identified improved railway connectivity to the capital city as a critical element integral to the growth of regional cities.

8-80 Cities

- Cities must be planned, designed and managed to be good for everyone aged from 8 to 80. If this is the focus, it naturally leads to safe and accessible towns and cities.
  - Good public transport for all at any time.
  - Shared places and spaces with focus on safe and separated walking and cycling and access to public transport.
  - Very low speed environments for all forms of motor vehicles (except on arterial roads)

Urban freight and logistics.

- Policy is needed to radically transform towards a 21st century model for urban freight and logistics that recognises the need have a framework for the distribution of goods in, around and between urban centres. Designated freight networks and distribution centres used by larger trucks would be complemented by smaller electric vehicles (incl bikes where possible) to undertake the freight task – particularly for the "first/last kilometre" trips.

Full integration of planning and transport

- at all stages from strategic planning to delivery. This would clearly need to cover matters such as location of affordable housing close to public transport as has been advocated for decades, but often not delivered.

Need for a National Settlement/Population Distribution Strategy

TCPA contends that redressing the imbalance of growth and its consequences is a national issue, and we would welcome and support the development of a National Settlement/Population Distribution Strategy.

- **There is no sense of the geography of population distribution across Australia**

Urban clusters in regions of national importance, where such centres can be within 1 – 1½ hours of each other and their total population well exceed 100,000 persons – e.g., Green Triangle region of south-eastern South Australia and south-western Victoria.

7. The Metrics of Accessibility

The terms 'access' and 'accessibility' (and similar terms such as 'walkability' and 'well-located') appear in many of the initiatives identified in the NUP Consultation Draft - for example, access to social services and to public transport. This suggests that there is, or should be a standard, or a set of standards, for monitoring or assessing these terms. However, the development and application of metrics in this field is complex and likely to require considerable attention to data collection and analysis.

Firstly, more often than not, these terms are poorly defined. It is important that the context (access to what?) is clearly understood. For example, when discussing access to:

- ***Basic services***, an appropriate definition would include a measure of time or distance, the means of getting there, and the size or importance of the centre (e.g. 800 metres, or 10 minute walk to a neighbourhood centre; 20 minutes by public transport to a large district centre, etc); and
- ***Public transport***, an additional consideration is whether the vehicles and the stations and stops are suitably designed for people with a disability, or aged or infirm persons, or a family with young children, strollers, baggage, and so forth.

- ***Financial resources for housing*** (i.e. affordability). The objectives of walkability and affordability lead to a solution in medium-high density neighbourhoods. Apartments are considerably cheaper than stand-alone housing, and are suited to first-time home buyers as well as retired people. The provision of public housing in the same format is required for those of even more limited means. The only alternative is to supplement the income of low-paid workers and increase unemployment benefits. Given that not all people can be trusted to spend their income wisely, provision of subsidised, means-tested rental housing is the only sensible option.

Secondly, setting standards cuts both ways. While it implies that residents within the standard will have an acceptable level of access, it must also ensure that the firms that provide the public or commercial services must have sufficient residents within their catchment area to be economically viable - thereby introducing, for example, a need to mandate a sufficient proportion of multi-storey housing.

These are currently topics of research and analysis within TCPA.

8. Planning across State Borders

There are identifiable regions where communities straddle interstate or other jurisdictional boundaries, for example along the River Murray: Albury - Wodonga; Echuca - Moama; Shepparton - NSW Riverina, and Mildura - Wentworth. A rather different example exists across the border of Victoria's south-west and South Australia's south-east, in a region now known as the Green Triangle, encompassing the key urban centres of Mt Gambier and Portland, and extending towards Naracoorte, Hamilton and Warrnambool.

If the planning and delivery of services (e.g. in health and education) for these kinds of communities were to be conducted strictly according to state boundaries, then the outcomes (in terms of access to quality services) are likely to be sub-optimal. A National Urban Policy may assist in recognising the existence of 'functional' regions such as these, and facilitating co-ordinated arrangements that provide better services for the people in the region when it is taken as a whole.

END

For any queries regarding this submission contact the Honorary Secretary, Town and Country Planning Association Inc., Email: *secretary@tcpa.org.au*

ATTACHMENT 1

Growing Victoria's Regions (July 2024)

Growing Victoria's Regions (July 2024), Rail Futures Institute Inc. and Town and Country Planning Association Inc., Melbourne.

This report is currently being distributed to key stakeholders across all three tiers of government, agencies, industry, and community interest associations.

It will shortly be published on the websites of both organisations.

A PDF version of the report is included in the covering email to this submission.

- File name: "*Draft NUP_TCPA Submission Attachment 1_growing victorias regions FINAL*"
  File size: 4.7MB

ATTACHMENT 2

About the Town and Country Planning Association (TCPA)

The TCPA is a politically independent, not-for-profit association incorporated in Victoria.

Since its inception, it has been part of the TCPA's ethos "*to give the town a bit of the country, and the country a bit of the town*". TCPA and its members have interests and expertise in a wide range of topics informing its current research activities. They are potentially relevant to the development of a National Urban Policy, including:

- Health and wellbeing as a central objective of urban planning
  - walking - both recreational and functional
  - access to health services
- Urban planning and design
  - principles, design standards and controls - especially where high-density and medium-density developments are planned - to ensure provision of public spaces and enjoyment of a high quality environment
  - the definition, planning and design of neighbourhoods
- Transport services and infrastructure
  - urban and regional, passenger and freight, motorised and non-motorised
  - the connectivity and accessibility provided by transport networks
  - travel behaviour change programs (e.g., TravelSmart), and local access demonstration projects
  - new technologies
- Regionalisation
  - the growth of regional cities
  - servicing regional clusters or conurbations
- Urban sustainability and the provision of green infrastructure
  - building new areas around walking and cycling networks within green reserves free from motor traffic
  - energy efficiency in buildings
- Airport and airspace planning
  - noise and environmental impacts
- National land transport networks
  - freight and logistics
  - interstate passenger services and high speed rail