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Submission: Consultation on a National Urban Policy for Australia

The Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts
GPO Box 594
Parliament House
Canberra ACT 2601

Submitted via the Consultation Website.

To whom it may concern,

Thank you for the opportunity to provide feedback on Australia's first National Urban Policy.

WSROC welcomes the Australian Government's aim to deliver an overarching national strategy for improving the liveability, equity, productivity, sustainability and resilience of Australia's cities. As a local government entity, WSROC strongly believes that the character and design of local places is best delivered with the input of local organisations and communities. However, a strong national vision is essential, providing a clear direction for all levels of government and industry to work towards.

WSROC would like to emphasise that national frameworks such as the National Urban Policy do significantly impact the way places are delivered on the ground due to their capacity to shape how subservient policies, funding packages and industry investment are delivered at the local level. As such, we hope that this submission will be considered in the context of how the National Urban Policy can best support on-ground outcomes.

Please note that some of WSROC's member councils may make their own submissions to this consultation. This document should be viewed in addition, and complimentary to those responses. WSROC and its members would welcome the opportunity to further discuss issues raised in this submission. Should there be any questions, please do not hesitate to contact me.

Yours sincerely,

Charles Casuscelli RFD
WSROC CEO

About WSROC

The Western Sydney Regional Organisation of Councils (WSROC) Limited is a membership organisation representing local government in Western Sydney. With a reputation for considered policy analysis and bipartisan advocacy, WSROC has brought a collective voice to those issues which are crucial for Greater Western Sydney's growing population since 1973.

In addition to its advocacy role, WSROC is currently leading four major programs that take a regional, collaborative approach to policy development and implementation, these include:

Western Sydney Regional Waste and Resource Recovery Strategy

The Western Sydney Regional Waste and Sustainable Materials Strategy 2022-27 ('the Strategy') is a collaboration between eight councils and WSROC to transition towards a circular economy. Since 2014, Western Sydney councils have successfully developed and delivered two regional waste strategies, fostering a successful and collaborative working relationship. The strategy not only builds on the lessons and achievements from the previous strategies to ensure continuous improvements but reflects the significant changes in the management of waste in Australia.

Participants include: Blacktown City Council, Blue Mountains City Council, Cumberland City Council, Fairfield City Council, Hawkesbury City Council, The Hills Shire Council, Liverpool City Council and City of Parramatta.

Western Sydney Energy Program

The Western Sydney Energy Program is a collaboration between Western Sydney councils. The program aims to realise energy, cost and emission savings for Western Sydney councils and their communities. To date, collective efforts of Western Sydney councils have already saved more than $20 million. Each year, our efforts reduce emissions by almost 500,000 tCO2e across a wide range of projects such as lighting and equipment upgrades, waste management, solar installations, and Smart Cities initiatives. The Western Sydney Energy Program aims to maximise existing programs as well as implement new initiatives.

Participants include: Blacktown City Council, Blue Mountains City Council, Camden City Council, Cumberland City Council, Hawkesbury City Council, The Hills Shire Council and Liverpool City Council and City of Parramatta.

Greater Sydney Heat Taskforce

Heat is Australia's most deadly natural hazard with significant and growing impacts on our communities, economy, environment, and infrastructure. Despite these impacts, Sydney has no coordinated arrangements in place to measure, mitigate or manage heat impacts. The Greater Sydney Heat Taskforce program seeks to address this gap, aiming towards a long-term vision where people living in Greater Sydney can survive and thrive in a warming climate and during extreme heat events. Taskforce program outputs include:

- **Heat Smart City Plan:** A multi-sector heat resilience plan for Greater Sydney.
- **Cool Suburbs NSW:** A science-led heat resilience rating tool for urban design and development.
- **Community Heat Risk Assessment:** Place-based heatwave risk assessment tool that focuses on community health and wellbeing.
- **Heatwave Management Guide:** For local government on the management of heatwaves.

Taskforce members: Resilient Sydney, Blacktown City Council, Liverpool City Council, NSW Department of Planning, Housing and Infrastructure, NSW Health, NSW Reconstruction Authority, Transport for NSW, NSW Department of Climate Change, Energy, the Environment and Water, NSW Police, Sydney Water, Committee for Sydney, Endeavour Energy, Swiss Re, Property Council of Australia, Green Building Council of Australia, Australian Red Cross, Sweltering Cities, Western Sydney Community Forum, Western Sydney University, UNSW, University of Sydney.

Cumberland Plains Conservation Program (CPCP)

WSROC in partnership with the NSW Department of Planning, Housing and Infrastructure is implementing two new initiatives in support of the CPCP:

- CPCP Caring for Country Council Grants Program (2 years), all CPCP councils plus the Blue Mountains City Council and,
- CPCP Compliance Strategy Pilot (15 months), all CPCP councils.

The CPCP has authority by virtue of the NSW Biodiversity Conservation Act 2016 and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999. The CPCP recognises councils as one of the key delivery partners for implementing its conservation program. Both aforementioned initiatives form critical components of the CPCP deliverables and are designed to assist councils with their contribution towards achieving the CPCP outcomes.

CPCP participants: Blacktown City Council, Blue Mountains City Council, Camden Council, Campbelltown City Council, Fairfield City Council, Hawkesbury City Council, Liverpool City Council, Penrith City Council and Wollondilly City Council.

Submission overview

The draft National Urban Policy outlines a promising pathway to collaboration on some of the most important issues impacting Australian cities and suburbs today. Overall the objectives, principles and goals of the draft Policy strongly align with WSROC's strategic priorities as outlined by its member councils. Further, it identifies and acknowledges some of the key challenges and needs expressed by WSROC stakeholders through the delivery of programs to build Western Sydney's liveability, resilience, sustainability and equity.

This submission outlines nine recommendations based on WSROC's understanding of how this Policy would bed-down in practice and influence our work and that of our members and stakeholders.

Recommendation 1: That local government representation to National Urban Policy be expanded beyond ALGA and the Council of Capital City Lord Mayors. Representation should include, at the very least, state and territory peak bodies (e.g. Local Government NSW), but also consider representation from regional organisations or those representing different urban typologies (e.g. National Growth Areas Alliance).

Recommendation 2: That a shared vision for the three levels of government include consideration of sustainable resourcing models that will better support Policy delivery.

Recommendation 3: The Policy's goals are clearly defined and, to the extent possible, definitions are consistently used across federal, state and territory plans and policies.

Recommendation 4: The Policy set a new direction in defining housing affordability. One that includes not just the purchase price of a dwelling, but also the cost of running and servicing a dwelling (e.g. energy, waste, insurance).

Recommendation 5: The Policy prioritise the development of an evidence base that is accessible, shared, fit-for-purpose and aligns existing work across sectors and levels of government.

Recommendation 6: The Policy recognise and overtly state the significant control state and territory governments can have over the levers of urban planning and building consent.

Recommendation 7: The Policy recognise and support the significant role local government plays in active resilience building, incident response and recovery.

Recommendation 8: The Policy more strongly articulate a range of resilience challenges facing Australia's cities and urban areas to allow for agility in response to emergent issues.

1. A shared vision must include local government

WSROC agrees that a shared vision is required across levels and sectors of government. However, at present the vision as outlined in the draft Plan does not include local government. Whilst WSROC acknowledges that local government is effectively an agency of the state, many key elements critical to the liveability, sustainability and resilience of cities and suburbs sit with local government (e.g. local planning, community infrastructure, services and waste management). In WSROC's experience the delivery mechanisms associated with these functions are often not well understood by state government, and direct consultation is required to understand the implication of new policies on delivery at the local and regional levels.

Local government consultation

WSROC acknowledges that engaging with the numerous local governments across Australia would be challenging and resource intensive, however at the very least, the peak bodies for each state and territory (i.e. Local Government NSW) should be directly engaged as part of the National Urban Policy agenda. Doing so will deliver a far stronger outcome and save time and money in delivery of the Policy's vision. In WSROC's opinion, ALGA alone cannot represent the variety of views required for Policy delivery – just as the federal government cannot be aware of all the intricacies of its state and territory governments.

Further, while the Council of Capital City Lord Mayors is an appropriate forum to discuss matters related to cities, we caution use of this forum as a proxy for suburban and regional councils. Noting that capital city councils are (generally speaking) significantly better resourced and represented at the state level than their suburban and regional counterparts. As such their perspective on issues – particularly relating to the capacity of local governments to deliver outcomes – may not be reflective of other councils. This is particularly true given the Policy's stated linkages to other initiatives such as the Regional Investment Framework.

Resourcing a shared vision

Local government is increasingly being asked to do more in relation to resilience building, climate adaptation and service delivery. This is often appropriate given local government's understanding of place, connection to community, and legislative role in infrastructure and service delivery, however it is not appropriate given the funding and resourcing mechanisms in place to support local government. Local governments' only source of income is rates, and state and federal grants. Over the last decade rate capping (in NSW) and indexation freezes on Financial Assistance Grants have severely restricted the

financial capacity of local government. These mechanisms no longer reflect the function that councils play, and in cases hinder their capacity to deliver on broader policy objectives.

In the interests of delivering liveable, equitable, productive, sustainable and resilient local areas, the National Urban Policy should consider a holistic review of the funding mechanisms that support city-making – to ensure that objectives can be sustainably delivered – whatever the level of government or geographic area. This may include more direct, consistent funding of local delivery, or collaborative regional arrangements such as those facilitated by WSROC in partnership with state government and local councils (e.g. Western Sydney Regional Waste Strategy or Cumberland Plain Conservation Strategy Compliance Program).

Recommendation 1: That local government representation to National Urban Policy be expanded beyond ALGA and the Council of Capital City Lord Mayors. Representation should include, at the very least, state and territory peak bodies (e.g. Local Government NSW), but also consider representation from regional organisations and those representing different urban typologies (e.g. National Growth Areas Alliance).

Recommendation 2: That a shared vision for the three levels of government include consideration of sustainable resourcing models that will better support Policy delivery.

2. WSROC supports the Plan's goals: Liveable, equitable, productive, sustainable and resilient.

WSROC welcomes the very community-focused nature of the plan's five goals. We particularly welcome the Policy's attempt to define these goals clearly. Terms such as *liveable, sustainable* and *resilient* are used extensively and understood differently by a range of industries and sectors and clear definitions provide focus and clarity to those responsible for Policy implementation. Several previous policies have failed to define key terms (e.g. 'resilience' in the *National Strategy for Disaster Resilience*) and this has resulted in implementation challenges across the system of actors it encompasses.

WSROC suggests that where possible, state and federal governments agree on the definitions used in this Policy, so that there is clarity and coordination between federal and state policies using similar terminology (e.g. in NSW, Greater Sydney District Plans, Climate Change Adaptation Strategy, Disaster Adaptation Plans).

> **Recommendation 3: The Policy's goals are clearly defined and, to the extent possible, definitions are consistently used across federal, state and territory plans and policies.**

3. No-one and no place left behind: Housing affordability

WSROC agrees that housing affordability is a significant challenge facing Australian cities and suburbs. We welcome the inclusion of housing affordability as a priority under *'No-one and no place left behind'* but caution that housing affordability should not be limited to purchase or rental price of a dwelling. The cost of housing also includes energy, water, insurance, transport and more. If national singularly focus on purchase rather than ongoing 'lifecycle' costs (see Appendix B), then we may unwittingly reduce the former at the cost of the latter. Is $5000 saved on construction costs worth 20 years of expensive energy bills? This is particularly important as lifecycle costs are likely to have the most long-term impact on renters and other lower-income households, and research shows that energy bills specifically contribute significantly to cost of living pressures and can come at the expense of occupants' health and wellbeing.
The concept of lifecycle costs is also relevant to government budgets at the federal and state levels. While housing delivered in more developed areas may have a more expensive purchase price due to land costs, it is likely to have fewer costs to government when considering the cost of infrastructure provision for example.

> **Recommendation 4: The Policy set a new direction in defining housing affordability. One that includes not just the purchase price of a dwelling, but also the cost of running and servicing a dwelling (e.g. energy, waste, insurance).**

4. National Urban Policy principles are generally supported. Clarity is required regarding evidence base.

WSROC broadly supports the principles outlined in the National Urban Policy.

Regarding *"Improving the evidence base will underpin urban innovation",* WSROC encourages the Australian Government to consider tweaking this to articulate the importance of a 'shared' evidence base. In August 2023, WSROC established the Greater Sydney Heat Taskforce; a collaboration with 40 organisations across three levels of government, industry and the community sector, to co-design a coordinated heat resilience plan for Greater Sydney. One of the key outcomes of this process has been acknowledging the importance of shared data to underpin problem definition; a single source of truth from which to base collective action. Three key findings relating to data and evidence are worth consideration for the National Urban Policy:

a. The need for shared data

Stakeholders in the Taskforce process have agreed on the need for shared, accessible datasets to support collaboration and coordination. For example, on the issue of heat resilience there are currently no clear definitions of what types of data and evidence are the 'single source of truth' for policy makers. In addition, clarification on the types of data to be used for different purposes is needed (e.g. UTCI for human health impacts, Land Surface Temperature for infrastructure impacts). Shared, accessible datasets are particularly important for less well-resourced organisations such as councils and the community sector, providing the information they need to guide efficient investment.

b. Ensuring shared datasets are designed to be useful for all partners

A second point of clarity regarding this principle is the need for more granular, fit-for-purpose data to support local decisions.

The Australian Government and its agencies (Australian Bureau of Statistics, Bureau of Meteorology etc.) play an important role in providing verifiable, consistently collected data for use by organisations across Australia. However, in many cases, national datasets are too high-level to be practically useful for local government and local community organisations. A good example of this is Bureau of Meteorology data.

Currently, heat-related data are based on a limited number of Bureau of Meteorology stations and provide a low level of granularity. Whilst the maintenance of long-term, valid Bureau data is important for understanding long-term climate change, it is often not suitable for the types of decisions that local governments are making in place. For example, one of the key uses for heat mapping data by local

government is prioritisation of climate adaptation investment (bus shelter upgrades, tree planting etc). Bureau data is inappropriate for this use for two key reasons:

- Bureau of Meteorology stations are strategically placed in locations with low impact from urban development to ensure long-term data validity. This provides a poor reflection of the actual conditions experienced by people in cities and suburbs due to impacts of the built environment.
- Councils need to know, should I invest in street A or street B? Bureau of Meteorology data is unable to help answer this question due to its low granularity. This has resulted in some councils investing significant funds in local heat mapping. However, it should be noted that such collection is not ideal because:
    - Data collection is generally one-off due to short term funding streams.
    - Methodologies differ each time, so data is not comparable across LGAs.
    - Only well-resourced councils can afford to generate data, creating inequalities.

WSROC understands that Bureau of Meteorology stations provide a specific type of data for a particular purpose. However, we see opportunities for the Australian Government to support the establishment – possibly in partnership with state and local government of a secondary network for more granular data.

c. Avoiding duplication and building on existing work

Finally, the Taskforce group have identified the need to understand current data and evidence to avoid duplication and focus resources on progressing existing work where it is successful. For example, in the heat resilience space there is significant work already completed in Greater Sydney that is available to be scaled nationally. Exemplifying the principle of building on the baseline is Cool Suburbs NSW. Cool Suburbs is a heat resilience rating and assessment tool for urban development. Cool Suburbs builds on existing evidence around heat resilient design in partnership with a panel of leading researchers across Australian universities. It has also been developed in partnership with NSW Department of Planning, Housing and Infrastructure, Sydney Water, Western Sydney Parklands Authority and leading developers to draw in and align with existing urban planning guidance. Cool Suburbs NSW is now a recognised pathway through the Green Building Council of Australia's Green Star Communities accreditation.

Recommendation 5: The Policy prioritise the development of an evidence base that is accessible, shared, fit-for-purpose and aligns existing work across sectors and levels of government.

5. Articulation of roles and responsibilities need nuance

WSROC welcomes the National Urban Policy's approach to outlining the respective roles of federal, state and local governments. This articulation is important for readers who may have carriage over development policy implementation and funding programs. Such programs must be cognisant of where appropriate urban delivery levers sit to be effective. Overall, we find the articulation to generally align with WSROC's understanding of the relationship between federal, state and local government, however there are two areas where the respective roles could be more clearly articulated.

Planning levers for the majority of Western Sydney development sit with NSW Government

In the Sydney context, the NSW Government plays a far greater role in urban planning and building approvals than is currently reflected in the National Urban Policy. For example, in Western Sydney, more than half of new residential development bypasses local planning controls to be approved through state planning policies such as the Exempt and Complying Development SEPP. In some LGAs, particularly designated growth areas, as much as 68% of new dwellings are approved through this pathway. This is an important clarification as there are many urban challenges where local government has very limited control over planning levers. This includes:

- Addressing urban and extreme heat through specification of verge widths, plot ratios and cool materials (e.g. roof colour).
- Ensuring waste infrastructure in residential dwellings is fit for purpose to ensure waste services can be provided and recycling requirements are enabled.

Councils play a lead role in community resilience building

Given 'resilience' is a key focus of the National Urban Policy, WSROC suggests the document should better recognise the role local government plays in building community resilience and cohesion, as well as responding to and recovering from disasters. This is true regardless of a specific council's capacity to fulfill these tasks as the level of government closest to community. The lack of recognition of council's role in resilience building is a consistent and ongoing trend at both the federal and state levels and frequently has implications for:

- funding and resourcing local government to undertake these tasks
- engagement with councils on community needs.

Recommendation 6: The Policy recognise and overtly state the significant control state and territory governments can have over the levers of urban planning and building consent.

Recommendation 7: The Policy recognise and support the significant role local government plays in active resilience building, incident response and recovery.

6. Cities must be resilient to more than just climate change

While climate change is one of the most significant challenges facing our cities today and in future, WSROC cautions against the Plan's singular focus on resilience to climate-related hazards. There are a range of potential hazards impacting our cities and suburbs that would be excluded by the current definition of resilience these could include:

- Pandemic
- Cyber attack
- Financial market shocks
- International conflicts

It may be that climate-related hazards are the priority for this Policy and the current Government. This can be stated whilst still acknowledging the range of potential shocks that may impact our urban areas.

Recommendation 8: That the Policy more strongly articulates a range of resilience challenges facing Australia's cities and urban areas to allow for agility in response to emergent issues.

Conclusion

The draft National Urban Policy outlines a promising pathway to collaboration on some of the most important issues impacting Australian cities and suburbs today. However several improvements could strengthen the ability of the Policy to deliver stated outcomes, these include:

- Refining definitions to strengthen clarity on key goals and objectives.
- Stronger articulation of roles and interdependencies between different levels of government - including greater consultation with local government as a key delivery agency.
- Stronger focus on developing data and resourcing arrangements for implementation.

If you have further questions about any of the issues raised in this submission, please do not hesitate to contact the Western Sydney Regional Organisation of Councils:

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