



04/07/2024

Submission to the Department of Infrastructure, Transport, Regional Development,
Communication & the Arts: National Urban Policy Consultation

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Patrick and Nicky also serve as expert advisors to the Greater Sydney Heat Taskforce and the Western Sydney Health Alliance. We also sit on the Executive Committee of the Healthy Populations and Environments platform within the Sydney Partnership for Health, Education, Research, and Enterprise.

We welcome the opportunity to comment on the Australian Government's draft National Policy and commend the government for prioritising urban concerns. We would like to provide a series of recommendations to strengthen the draft policy. We particularly centre on the imperative to address climate change impacts on health as the principle focus of the final Urban Policy. Climate mitigation and adaptation drives the justification and need for Federal government to take the lead and oversee (plus in effect overhaul) state and local governments long tasked with urban policies. Whilst the draft policy refers to climate change as well as health and well-being, they are separated out and inter connectivity missing.

The issues covered in the draft are well known and evidence based ¹². However, the draft is all encompassing, presenting a series of familiar problems rather than offering a much needed, fresh and targeted set of solutions. Its inherent lack of focus and disconnection of issues, waters down the key messages behind why we need this strategy. Grand high level aspirations risk

¹ Kent, J. L, & Thompson, S. (2019). *Planning Australia's Healthy Built Environments*. New York: Routledge. ISBN: 9781138696365 (hbk).

² Prior J, Liu E, de Leeuw E, Morrison N, Tsouros A, practice. Urban planning and development for health: key principles to guide action and change. Public health research and practice. 2023.



being window dressing on substantial problems facing Australia in the short and long terms. Detail is particularly lacking on implementation and delivery, including substantive indicators for progress as well as governance and regulatory responsibilities for effective federally led urban reform. Duplicating state and local government efforts is similarly moot. Instead, the policy represents a crucial opportunity for the Federal government to lead concerted efforts that align all three tiers of government to improve urban outcomes across society. The policy is a chance to address policy implementation barriers that have been created by the legacy of a lack of interest and divestment of real power from the Commonwealth, and the disabling of local governments in favour of centralised state decision making processes and mechanisms. This has failed to effectively balance the very issues raised in the draft.

In this submission, we set out how the NUP can become a stronger interconnected and action oriented strategy.

1. Climate, human health, and equity at the centre of the NUP

Climate change is the most pressing issues facing urban areas in Australia today. Mitigation and adaptation to climate change impacts, the impacts of urban development on human health and wellbeing, and the realities of planning for equitable outcomes should form the core of the policy. We welcome the mix of liveable, equitable, productive, sustainable and resilient domains. We also support the emphasis on place-based approaches. However current urban policy in Australia places overemphasis on unsustainable growth at the expense of impacts on society and people, eroding the ability of urban governance systems to promote the health and wellbeing of all people, and future generations. We recommend that addressing climate change for health, wellbeing and equity be at the heart of the policy, with the 5 domains in supporting roles.

2. Formalised roles and responsibilities and effective funding streams to achieve implementation

The urgency of climate change, now epitomised by its direct impacts on human health, surpasses any single legislation or government level. Solutions lie in uniting all levels of government, industry, civil society and the community in an ongoing but also formalised partnership effort. Forging effective partnerships entails dismantling inter and intra organisational silos, across disciplines and interests, to eliminate duplication and inefficiencies across government.

The regional focus for implementation in the draft has merit given the historically weak urban governance model in Australia (cities and regions essentially have no representation). For this key element of NUP to be implemented, it is critical to formalise partnerships across governments and sectors in addressing urban challenges and harnessing opportunities. Land use planning are state level responsibilities currently. There are major gaps in that system that can be filled by a change in federation e.g. regional governance, city governance. However, the federal government has limited responsibilities and levers for change, so the key to reform is formalising those roles and levers to address climate change, health, wellbeing and equity.



For instance, we work extensively with all tiers of government, industry, and societal partners across New South Wales, particularly focusing on Western Sydney, the fastest growing region in Australia, and the potential urban economic engine of Australia. This region is a prime example of how regional level urban governance is core to the policy ³: the federal investment in the aerotropolis has brought a flurry of development and much needed infrastructural investment activity to the region, uniting councils and state agencies to develop coordinated governance mechanisms ⁴. However, the previous government's attempts at City Deals, we have shown, were unable to articulate risk, and instead promoted what in effect was an attempt at trickle down infrastructure led economics in the region, without attending to its diversity and existing dynamics ⁵. The 'Regional Investment Framework' positioned as a twin policy to the draft, risks similar challenges for effective, equitable, solutions. Climate change – devastating heat, floods and bushfires – a housing crisis driven by an unwavering expectation that the housing market needed no regulation, and existing high levels of social and health inequity, have all undermined the 'growth at all costs' mantra underpinning the Western Sydney City Deal. As an urban policy, the City Deal is now defunct, but lessons can still be learnt. The key lesson being that urban strategies require truthful detail about how to address risks, formal roles and responsibilities set out including accountability mechanisms and evaluative frameworks, including the meaningful engagement with communities affected by those risks. Without that engagement, legitimacy is fatally undermined.

In addition, the policy must acknowledge that effectiveness hinges on broad political, social, and economic acceptance of its principles. Without broad acceptance, the policy will remain mute and any associated legislative mechanism for transfer risks dilution, leading to poor implementation, and missed objectives. Sustainable funding matters too. Whilst the Federal government has committed to funding programs (p.10), long term, well planned, funding streams are required. This would provide stability, allowing organisations to plan long-term, reduce administrative burdens, build capacity, and ensure consistent service delivery. It fosters innovation, strategic partnerships, and a focus on meaningful outcomes, while making resource allocation more efficient. In contrast, competitive grants, often responding to disasters and emergencies, are unpredictable and resource-intensive, often hindering long-term planning and consistent service provision.

3. A federal legislative mandate is fundamental

Before effective partnerships can form, a strong Federal legislative mandate is essential. Without mandated consideration of climate change, health, wellbeing and equity, the risk is ultimately shifted onto communities who have the least voice and resources but are most affected. We urge the Federal government to require all state and local governments authorities,

³ Lawton A, Morrison N. The loss of peri-urban agricultural land and the state-local tensions in managing its demise: The case of Greater Western Sydney, Australia. *Land use policy*. 2022;120:106265.

⁴ Morrison N, Van Den Nouwelant R. Western Sydney's urban transformation: examining the governance arrangements driving forward the growth vision. *J Australian Planner*. 2020;56(2):73-82.

⁵ Harris P, Fisher M, Friel S, Sainsbury P, Harris E, De Leeuw E, et al. City deals and health equity in Sydney, Australia. *Health & Place*. 2022;73.



including planning in particular, to address climate, human health and equity in their policies, instruments and activities.

A genuinely legislated Federal commitment to tangible and transformative capabilities is imperative for Australia's urban areas. Urban problems are urgent and will not be addressed through business-as-usual approaches, where Federal leadership is interpreted as guidance rather requirement⁶. We desperately need a legislatively driven framework to position urban areas as systems that are able to accommodate risk, and adapt and respond to change quickly. It is not enough for the policy to stipulate "best practice guidelines" (p41) because we know that guidelines do not create change when they are floated in the absence of mandate which is informed by understanding through an appropriate and robust evidence base⁷.

Further, urban focussed legislation requires the upfront and explicit objective to address climate mitigation and adaptation for a mix of economic, social and health equity, and environmental reasons. That legislation requires a platform to support mandated action that stipulates quantifiable objectives for priority areas of climate, health, wellbeing and equity. Progress towards these objectives should be able to be measured using publicly available data.

4. Balancing economic, social and environmental urban concerns

Australian urban planning systems are structured to require investment from private interests to attain desired urban outcomes⁸. In many ways, this need for industry buy-in stifles sustainable urban development, placing short term profit making over and above the kind of long-term investment required for large-scale change.

Balanced urban policy must address complicated issues at scales that cover observable effects in populations. Population Health is an example of a critical urban issue that current state level urban legislation struggles to consider meaningfully (either at a strategic level with legislative teeth, or in development assessment of very large infrastructural investments). Population health provides an interesting lens through which to consider urban policy⁹. The status-quo, for example in the NSW planning system, is to default to development assessment on a project-by-project basis, or even to break projects down into stages. In effect, this prevents genuine consideration of the cumulative impacts of the proposed change, including impacts on the health of populations across regions and urban areas.

⁶ Harris, P. (2022). *Illuminating policy for health: Insights from a decade of researching urban and regional planning*. London: Palgrave MacMillan.

⁷ Harris P, Kent J, Sainsbury P, Riley E, Sharma N, Harris E. Healthy urban planning: an institutional policy analysis of strategic planning in Sydney, Australia. *Health promotion international*. 2020;35(5).

⁸ Harris, P., Kent, J., Sainsbury, P., Marie-Thow, A., Baum, F., Friel, S., & McCue, P. (2017). Creating 'healthy built environment' legislation in Australia; a policy analysis. *Health Promotion International*, dax055-dax055. doi:10.1093/heapro/dax055

⁹ Harris P, Riley E, Dawson A, Friel S, Lawson K. "Stop talking around projects and talk about solutions": Positioning health within infrastructure policy to achieve the Sustainable Development Goals. *Health Policy*. 2020;124(6):591-8.



Balance is essentially created in regulatory frameworks that implement the goals and objectives that are laid out in legislation and then implemented via planning systems and processes. We strongly recommend the policy leads to a comprehensive national review of state planning legislative frameworks to ensure climate change, health, wellbeing and equity are considered.

The draft itself demonstrates the challenges of effectively articulating balance in urban policies. Overall, the interconnected nature of each concept is missing across the draft. For example, liveability is connected to productivity and equity through the provision of infrastructure. Similarly, on page 17 and 18, transport is missing from liveability. These interconnections are crucial when interpreting multi-faceted aspirations such as liveability into urban policy because many of the components of liveability are influenced by local context. Without clear guidelines as to how the policy will treat liveability in action, liveability defaults to a series of global liveability indices rather than what is specifically needed to make Australian cities healthy and equitable¹⁰.

A full definition of infrastructure is also an example of how balance can be better articulated in the draft. It would be of value to create a section about different types of infrastructure rather than 'digital connectivity and infrastructure' which seems underdeveloped. Such a section might be used to discuss various conceptualisations of what infrastructure actually is, and the different structures and processes embedded within the term (built, hard, economic, soft, social and so forth). The social infrastructure index in Fig 2 is welcome but the reality is that Australian urban policy is driven by built infrastructure that preferences inner cities over regional areas. This is coupled with an obsession with economic benefits realisation in infrastructure planning and appraisal over a meaningful engagement with costs and risks. In addition, by discussing infrastructure schemas in their capacity to enhance broader goals such as health and wellbeing could guide investment types and decisions across the various issues to be covered by the policy. Also, it might be positive to unpack the goals of agglomerating infrastructure for placemaking (and which would link directly to productivity). Finally, the policy must recognise that infrastructure only works to improve a place when a mix of infrastructure is put in, and the community is engaged and empowered in place based decision making¹¹.

5. Equity

The presentation of data to support the draft is positive, as is the focus on equity and disadvantage throughout. However, Fig 1 risks seeing each in isolation so a connection across them is needed, for example by fixing climate change, health, wellbeing and equity in the middle.

¹⁰ McGreevy M, Harris P, Delany-Crowe T, Fisher M, Sainsbury P, Baum F. Can health and health equity be advanced by urban planning strategies designed to advance global competitiveness? Lessons from two Australian case studies. *Social Science & Medicine*. 2019;242:112594.

¹¹ Couper I, Jaques K, Reid A, Harris PJ. Placemaking and infrastructure through the lens of levelling up for health equity: A scoping review. *Health and Place*. 2023;80:102975.



Equity in urban policy requires considering both context (environment) and composition (people). For instance, a general goal of infrastructurally led agglomeration will not help equity unless that is achieved through the proper application of place based principles that are known to improve health equity: working with local knowledge, targeting solutions that address disadvantage, working across sectors over the long term, and minimising the resource implications of healthy solutions for individuals and communities.

Further, the policy should zero in on climate justice as the driver for improving equity. Climate justice requires considering the following dimensions of equity: Procedural – systemic drivers of social, economic, cultural, political, health, and institutional inequity, Intergenerational – drivers of injustice over both time and scale, Distributive – the roots of vulnerabilities in organisational adaptation and mitigation, and Recognition – voices and experiences of marginalised groups.

6. On-going, well funded, research and evaluation

We welcome the emphasis in the draft on an improved evidence base underpinning innovation. Australian urban policy requires well funded research and on-going evaluation and monitoring of effective implementation.

There is a role for universities to develop a collaborative research program and establish a centralised open access database. Currently much research and information on urban challenges and policy solutions is dispersed across different sources. Ensuring agreed data sets, information and research is freely and easily accessible to practitioners will support better outcomes.

Centralised and standardised data and evidence improves decision-making, enhances collaboration, and reduces resource duplication. It provides a holistic view of urban challenges and inter connectivity of issues. It enables a comprehensive assessment, supports timely response and adaptation, and fosters public awareness and engagement. Ultimately, accessible data is essential for long-term planning especially in the face of climate disruptions to infrastructure and community wellbeing.

In summary, we need strong federal legislation, formalising roles and responsibilities, more emphasis on implementation and delivery, long term funding streams, recognition of the interconnection of key issues, in particular climate change impact on health, equal priority given to economic, social and environmental concerns, with a strong commitment to addressing health equity. Finally on-going policy evaluation is critical. Universities play a key role in supporting government's strategy so that it becomes well defined, well delivered, and evaluated. We are here to support the government and our advice is readily available.

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