

Cities Division
Department of the Prime Minister and Cabinet
1 National Circuit
Barton ACT 2600
cityperformance@pmc.gov.au

18 August 2017

Re: National Cities Performance Framework

The establishment of a National Cities Performance Framework as outlined in the Preliminary Report is an important step towards capturing data at a national level for our largest cities.

The National Cities Performance Framework presents a valuable opportunity to begin to build a more comprehensive system of reporting the contextual and success indicators that help us understand our cities. Using the policy priorities identified by the Government to date, this approach should help drive business case development at a local level, and explain to communities the benefits of the Government's investments over the longer-term in the context of their city's own unique characteristics. We appreciate the commitment to ongoing consultation with industry both through the Cities Reference Group and more broadly as you seek to grow and improve the Framework. Our specific comments in that context and in response to the Preliminary Report are as follows;

Expanding the indicators

As outlined further below the range of indicators and metrics proposed in the Preliminary Report needs to be expanded in consultation with industry and expert groups.

A taxonomy of cities

The collection of data and the identification of indicators should not be limited by that which is available for all cities. A taxonomy of cities would be benefits in identifying data relevant for different types of cities. E.g. outer urban growth areas (for which there is a strong argument that some should be separately identified as per Western Sydney); major capital cities; regional centres. Where data sets are only available for some of these cities, they should nonetheless be reported where they provide important information about city performance.

Separate sustainability/environmental and liveability

Combining these two categories undermines the important contribution of each in delivering city performance, and in meeting specific broader government policy objectives, e.g. in health and energy policy. Environmental and liveability indicators should be separated to reflect the unique concerns of each.

Review environmental indicators

As an example of the opportunities missed in the current, relatively narrow selection of indicators, sustainability indicators considering greenhouse gas emissions only look at private vehicle transport per capita. This is not sufficient to provide any meaningful data on city performance, and in light of the Government's commitments to reduce emissions and increase energy productivity misses an opportunity to report how our cities are helping meet these commitments. Data for greenhouse gas emissions should be captured and reported across sectors including the built environment, residential and industrial.

If the narrower range of indicators progresses without further detailed review in consultation with industry, the Government should commit to detailed review of the Framework within the first year to fully expand the indicators across sectors.

Reconsider existing indicator frameworks

Green Star Communities

The lack of reference to Green Star Communities as one of the key indicator frameworks considered (Box 3) is an oversight considering the widespread application of this framework across Australia. Green Star Communities is now being used by every Government Land Organisation across the country, and more than 170,000 people are moving into Green Star Communities across Australia. Green Star is increasingly being embedded in state government policy through Government Land Organisations and development corporations as a requirement for new developments, for example the most recent version of the UrbanGrowth sustainability policy, and as part of the Sydney Olympic Park Authority Masterplan.

ASBEC Success Indicator Framework for Cities

Additionally, the Australian Sustainable Built Environment Council's [Success Indicator Framework for Cities](#), is also an important reference point for the expansion of the indicators used. This work reflects significant collaboration and expert input from across industry over many years, and highlights some of the deficiencies in the current indicators proposed.

A more comprehensive framework would create an opportunity to more explicitly inform the design of City Deals, and create a direct connection between the performance of a city, and the projects and investments that help improve that performance against targeted policy priorities over time.

Link the Performance Framework with City Deals

In addition to varying the indicators and data collected across a taxonomy of cities, there is also an opportunity to more clearly link the Cities Performance Framework with City Deals.

Identify indicators and data to be collected at a City Deal and project level

We recommend that the National Cities Performance Framework also identify a range of indicators and data sets that should be gathered at a City Deal and project level within City Deals. Data would not be necessarily be collected against these more granular indicators, but their identification within the broader indicators reported through the Framework would provide a connection between project performance, City Deals, city performance, and the Government's policy objectives as outlined.

Commit to third party verification at a City Deal and project level

The National Cities Performance Framework should also note the importance and opportunities to measure these outcomes at a project and City Deal level. Support through the Framework for independent third party verification like Green Star is appropriate to help ensure data is collected, outcomes measured, and city deal objectives met. This is an important mechanism to provide assurance that all parties to a City Deal are delivering on their commitments on the ground, and provides a mechanism for ongoing report as Green Star Communities ratings require renewal every five years. We recommend the Australian Government require the use of third party verification, like Green Star, on all relevant projects planned or funded through city deals.

Delivering city deals

Establishing development corporations & good governance

We welcome city deals as an important breakthrough in helping deliver integrated strategic planning and coordination across levels of government. In bringing the strategic vision that underpins city deals to reality, effective governance will be critical. The establishment of statutorily independent development corporations to guide development, manage procurement, engage effectively with the community and industry will be beneficial in delivering what are likely to be major, complex infrastructure and urban renewal projects. The success of agencies like the Fisherman's Bend Taskforce, the Barangaroo Delivery Authority and the Sydney Olympic Park Authority are powerful models to consider as mechanisms to drive effective city and economic development and renewal. The creation of the Townsville Development Corporation as part of the Townsville City Deal is a good example of this governance being implemented in the first of the Government's city deals.

We recommend the Australian Government incentivise the creation of targeted independent development corporations to support the delivery of city deals across Australia.

We would be pleased to have this feedback published as useful as part of your consultation on the Framework. Please do not hesitate to contact me on 02 8239 6200, or via email at jonathan.cartledge@gbca.org.au to discuss any of these issues further.

Sincerely

Jonathan Cartledge
Head of Public Affairs