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AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS
ACT CHAPTER (AILA ACT)
SUBMISSION

Evaluation Framework ACT Planning System

AILA ACT are supportive of the new ACT Planning System and its basis of being ‘outcome focused and performance based’. Putting in the Evaluation Framework is the crucial ‘information loop’ for the new system and AILA appreciates this opportunity to provide early feedback.

The Griffins designed Canberra to be a city integrated with the landscape. The physical and symbolic significance of this integration has always influenced the planning of Australia’s ‘Bush Capital’. And this regard to the landscape is evident at every scale, from the National Capital Development Commission’s use of the landscape to separate Canberra’s satellite towns, to the Commission defining the National Capital Open Space System through to the ACT Government’s more detailed attention to the urban forest and the city’s tree canopy cover.

It is because Canberra’s urban systems are so tightly woven with its site, setting, environment – the natural systems – that AILA ACT considers how this relationship is valued and monitored must be more explicit in the ultimate Evaluation and Monitoring Framework for the ACT Planning System. Given this, AILA ACT is concerned that as the Framework is refined its focus is on the measuring and collecting evidence on the nature of the built environment the planning system is delivering, especially regarding the environmental, human health and social justice impacts. AILA ACT acknowledges that it is important to gauge public perception and opinion and to consider how well the system itself is performing, but this is perhaps a separate evaluation exercise. Certainly, AILA ACT considers separating the evaluation of delivered outcomes from public opinion would give greater transparency and rigour.



Attached are more specific comments on the Evaluation and Framework document. AILA ACT understands that there is still more work to in finessing Framework and are keen to assist. As stated earlier, AILA ACT support the new Planning System and believe ts effective evaluation is critical to Canberra and is continued proud identity as the Bush Capital.

Your Sincerely

A handwritten signature in black ink, appearing to read 'Gay Williamson', written in a cursive style.

Gay Williamson RLA FAILA
AILA ACT Chapter President.



Specific Comments

1. Principles

These principles are a generic and their merit can only be proved when they are prescribed. In moving to that prescription:

- Targets and Measures should be based around the outcomes that directly influenced by the planning systems i.e. environment and human health. Further the targets and measures used should be in the system, few in number and capable of cross cutting to be able to measure the impact e.g. % increase in biodiversity in each Canberra suburb. This would give a good indication of the overall community and environmental health and could be easily further interrogated to determine if that increase is from the public or private realm, in turn indicating the level of access to open space.
- Balanced/ Collaborative and Values Expertise, AILA ACT considers that these principles would be better if replaced by Priorities. This would emphasise the outcome focus of the planning system, give greater guidance to all stakeholders as to what is important at the time of the evaluation and ultimately improve reporting and accountability.
- Establishing Priorities necessitates collaboration and an agreed definition of what is meant by liveability, diversity, etc. These concepts are not always clear and can mean different things for each group. By defining baselines and priorities greater deference is made to the impacts of decisions on those stakeholders that do not have a voice i.e. future generations and the plants and animals we share the Territory with.
- Similarly Good, diverse and accessible engagement/Transparent and Accountable could be amalgamated into Diverse information and representative governance. Information used for evaluation should be verifiable and credible. AILA ACT considers that there is a great deal of information that can be mined from recognised and reputable ACT Government agencies, Legislative Assembly enquiries, Community consultation report and Community organisations providing verifiable and broadly representative information.
- For example, a great deal of information can be mined from the State of the Environment Report.

The evaluation should be rigorous and the principle of engagement should be around disseminating the outcomes of the evaluation. The release of information and the effective engagement of other Directorates, community groups and agencies is critical to shaping future policy responses and behaviours.

2. Scope

AILA ACT acknowledges the challenges in moving to a new planning system and defining the basis of evaluating its merit.



However, recognising the planning system is instrumental to delivering on other ACT Government policies and imperatives is critical and many of the targets and measures adopted for these should be incorporated into the evaluation and monitoring of the planning system, especially the Living Infrastructure targets.

3. Program Logic

Again, AILA ACT supports the ‘logic’ and its intent but would caution on a ‘program logic’ that is constrained by the planning system itself i.e. that does not take account of the context in which change is happening.

The questions underlying the ‘program logic’ should facilitate a broader, deeper line of ‘enquiry’ and ultimately a more effective, useful evaluation. For example, rather than ask the ‘closed’ question that infers we can easily identify the short term changes the planning system can deliver, for instance with climate change, it would be more rigorous to ask :

- What are the factors outside planning system that might slow the uptake of climate change adaptation?
- What is the duration/cycle of these factors in comparison to this cycle of evaluation?
- Where does the planning system intersect with these factors? At what spatial scale? What is the nature of the intersection at the various levels of the Planning system – strategic or development approval?

A broader line of enquiry teases out more of the relationships and begins to point to the possibilities for the second part of the ‘logic’ – what elements in the planning system need to improve and how.

4. Focus of Evaluations

Just as the new Planning System is outcome focused and performance based, so must this Evaluation Framework. In that regard AILA ACT considers that focus of the evaluation should be

- First on the planning outcomes, and
- Second on the system process outcomes as these represent the ‘performance’.

AILA ACT, even at this early stage, considers such a change in approach would ensure greater deference to the considering the relationship of systems, especially the impact on the landscape. Indeed, AILA ACT would argue that long term outcomes are completely within the scope of the planning system and progress on their delivery should be part of the evaluation and monitoring. Longitudinal studies are important for identifying whether built environment policies are affecting change in ways that are expected or not, as such impacts take a while to manifest themselves.

There are many examples, models and evidence to be found in planning, design and health literature on the critical significance and framing of longitudinal evaluation.



5. Key Evaluation Questions

Given comments in point 3 Program Logic, AILA ACT is concerned that the evaluation questions identified are ‘closed’ and have not been framed around the domains of ‘effectiveness, impact, efficiency, appropriateness, sustainability and learning” .

AILA ACT strongly encourages reframing these questions to develop a meaningful evaluation that has a ‘direct line of sight’ to these domains, for example:

- How effective is the planning system in delivering on ?
- What elements in the system are most effective?
- Where have efficiencies been demonstrated.

The use of qualitative data is always difficult, and the questions framed in the document are very subjective and dependent on the views of those being asked. There is a need for more rigorous measures using quantitative data, particularly to assess environmental, health , economic and social justice impacts which are the outcomes of planning decisions. Water, air quality, reduction in chronic health conditions, changes in heat mapping, increase in biodiversity are measurable and provide unequivocal evidence on which to frame policy decisions.

6. Monitoring

AILA ACT supports the breadth of data being ‘mined’ to establish a baseline. These ‘indirect’ sources of information (such as the Legislative Assembly’s enquiry into Nature in the City), these can be as valuable as targeted data (e.g. number of types of dwellings) because they reflect the relationship of a number of urban and natural systems.

Along with the two baseline studies identified for users and DA’s, AILA ACT strongly recommends developing a GIS base for Canberra’s ‘living infrastructure’. This is extremely important to monitoring the canopy cover, assessing biodiversity, identifying important landscapes for ecological and aesthetic connectivity.

7. Governance

AILA ACT considers there is merit in setting up an independent ‘Audit’ of the Evaluation and Monitoring of the Planning System. This would help to gain stakeholder trust in the finding and ensure transparency and accountability.