

Module 2:

Preparing and Implementing a Local Housing Strategy

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Module 2

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Evidence
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and
Resources



SYDNEY, 2019

This edition of

The Local Government Housing Kit

has been prepared for

The Department of Communities and Justice

by

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HALSTEAD PRESS



Urbanista acknowledges the following agencies which supplied illustrations:

Bridge Housing, BuyAssist, City West Housing, Common Equity NSW, Compass Housing, Evolve Housing, Homes North, Link Housing, North Coast Community Housing, SEARMS Aboriginal Corporation, SGCH and Southern Cross Community Housing;

and thanks Philippa Davis, Department of Communities and Justice, for her invaluable support and for making this project possible.

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Outline

Solutions to housing challenges are achievable when local housing strategies are developed with a clear vision and a genuine commitment across Council, and where responses are based on a sound understanding of issues and housing needs. Significant improvements are most likely when councils are open to exploring all their roles and functions and to working in partnership with others. Module 2 provides a sequential guide to developing a local housing strategy, but it is important that the steps be planned for and integrated at the outset.

Step 1 Community and Stakeholder Engagement

Why is it Crucial?

It provides insight into housing issues, local circumstances and the dimensions of housing need.

- ◆ It both reveals and informs community expectations and priorities.
- ◆ It identifies opportunities and generates ways of responding to housing needs.
- ◆ It enables findings to be verified and initiatives to be tested.
- ◆ It helps build community ownership of local housing strategies and support for Council's part in addressing challenges through local approaches.
- ◆ It facilitates partnerships and collaboration.

When and Whom?

Engagement should not be confined to a single stage of the process. It is most powerful in building understanding – within both the community and the Council – when commenced early and continued throughout information gathering and policy development, and then pursued at strategic points during the implementation to monitor success and inform further steps.

Formal engagement processes should be combined with open communication channels through which people can make less structured contributions.

As housing affects everybody, a broad range of groups and other stakeholders should be consulted. To serve the housing needs of the entire community, a mix of voices and perspectives must be heard and addressed. Demographic data and projections should be consulted to develop engagement strategies that reach across the community, to include sections that are least vocal or least equipped to respond. If certain housing types, such as affordable rental housing and emergency housing are not common in the local area, it could lead to some sections of the community being under-represented in feedback. Discussions with community housing providers and developers may be the best way to connect with the needs of “hidden” members of the community.

Steps in Developing a local housing strategy

1. Planning and undertaking continuing community and stakeholder engagement
2. Developing an evidence base
3. Establishing the scope and identifying goals and objectives
4. Selecting strategies and actions
5. Developing an implementation plan
6. Monitoring, review and evaluation

These steps cannot be taken independently of each other. For example, community and stakeholder engagement should be a feature of both strategy development and implementation. Monitoring and evaluation are most effective when built in from the start.

What is an Engaged City: an engaged city brings people together for conversations to address issues of common importance, to solve shared problems, and to bring about positive social change. It involves people in the decision-making process such that it improves the resulting decision and, over time, builds the trust that is needed for fully empowered communities to actively create a common future

City of Vancouver, Engaged City Task Force, 2014

who to Engage

Parties which a council should consider engaging with when developing a housing strategy include:

- ◆ Local residents, including tenants, purchasers and other tenure types
- ◆ The elderly
- ◆ Indigenous residents and organisations
- ◆ Workers
- ◆ Community housing providers
- ◆ Homelessness organisations
- ◆ Community service organisations
- ◆ Private developers
- ◆ The business community
- ◆ Students and student bodies, if student accommodation is a feature of the local housing market
- ◆ Local institutions such as hospitals and universities
- ◆ Councillors and council staff
- ◆ Government agencies, such as DCJ and Landcom.

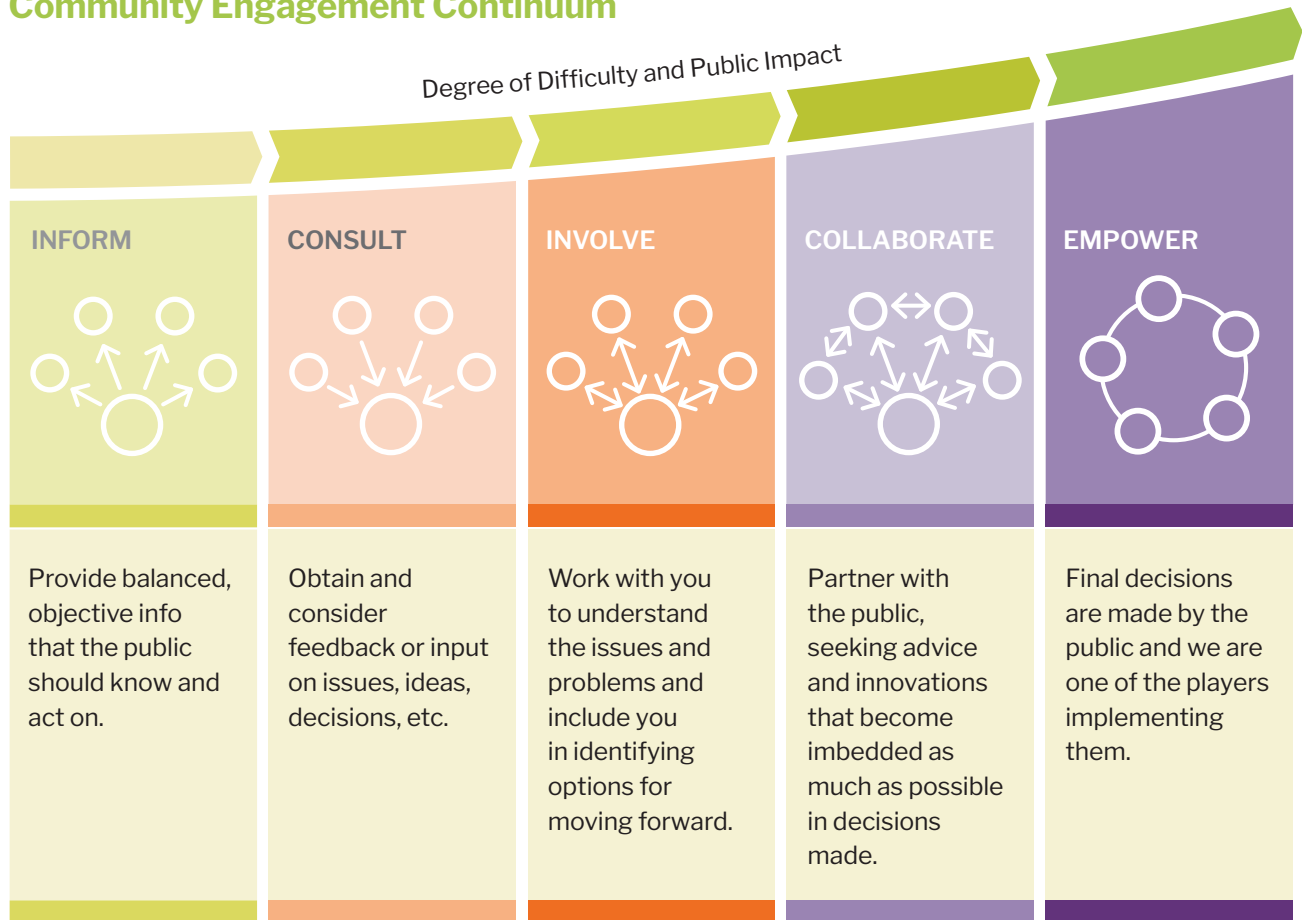
Developing an Engagement Strategy

A strategy for engaging stakeholders in housing issues can be developed as part of Council's broader approach to community engagement or as a discrete plan. Even if a discrete plan is proposed, it is important that it be designed in the context of other community engagement activities. When approaches to engaging with communities on local issues are too fragmented, messaging to and from the community can be confused, and responses may be fragmented and less effective.

Section 2.23 of the *Environmental Planning and Assessment Act* requires councils to prepare Community Participation Plans in respect of planning functions specified in section 2.21, which include making Local Environment Plans, development consents and contribution plans. Where these planning functions relate to matters being addressed in a local housing strategy, the plan for engaging with the community must meet the requirements of the section. Sub-section (4) provides that a council need not prepare a separate community participation plan if all the matters required in section 2.23 have been addressed when the council prepares its Community Strategic Plan under section 402 of the *Local Government Act 1993*.

The engagement strategy should set out principles and objectives for involving the community and stakeholders and provide a broadly based process employing a range of techniques, through all stages of developing and implementing a local housing strategy.

Community Engagement Continuum



Source: PlaceSpeak (<https://bit.ly/2CpkJGU>) adapted from the IAP2 framework

The International Association of Public Participation (IAP2) is devoted to furthering sound community engagement practices (see <https://bit.ly/2FxYRNs>). IAP2's Spectrum of Public Participation illustrated below defines different engagement activities based on their level of decision making and influence, from informing through to empowering, and identifies the outcomes and expectations involved in different kinds of involvement. It is helpful in providing a common language that can be used by participants and decision makers. IAP2 emphasises that "(t)he Spectrum show that differing levels of participation are legitimate depending on the goals, time frames, resources and levels of concern in the decision to be made".

To gain wide and meaningful input, a range of formats should be used and tailored to local circumstances. Traditional consultation methods such as public meetings and formal surveys are best complemented by less formal ways of reaching people, such as social media. Written communications and public meetings must not be the only ways people can provide input. There should be other channels, such as a phone-in line for recorded messages.

The best way to address social planning is to sit in the community space and listen.

Dr Iris Iwanicki, former President
Planning Institute of Australia SA



Approaches need to be tailored to different groups. Assistance from specialists may be required to reach certain parts of the community and to communicate effectively and appropriately. Be mindful of the cultural and other sensitivities of those you are seeking to engage with, as well as their specific needs and circumstances. Also check for unconscious bias when interpreting and prioritising community input.

An excellent example of an engagement strategy that addresses these considerations is Fairfield Council's *Community Engagement Strategy 2016 Integrated Planning and Reporting Framework* (<https://bit.ly/2FzyR4e>). See also Glenorchy City Council *Community Engagement Procedure* (<https://bit.ly/2Rvx0SS>).

Examples of approaches that may be used at different stages are given in the table opposite. It's important to define the outcomes sought, so engagement is focussed and meaningful for participants, and contributes the most it can to the strategy development process. One of the challenges of community engagement is that it is rarely possible to satisfy all parties. Input must be weighed up and balanced in the strategy development process. It is very helpful if engagement can help draw out and deal with diverging views and points of tension, and prompt participants to consider trade-offs and areas for compromise.

Equally it is important to encourage brainstorming and creative problem solving as local knowledge and insights can often lead to the best solutions. In addition, for winning community support it helps if participants see that Council is listening to their feedback and is receptive to their suggestions.

Community and Stakeholder Engagement Approaches

Housing Strategy Stage	Possible approach
Preliminary	- Establish a community engagement team. - Post news on the Council website outlining Council's intention to address housing issues. - Provide an outline of Council's process for engaging on housing issues in Council's regular newsletter. - Launch a webpage with sign up for e-newsletter and provision for direct lodgement of submissions. - Publicise through social media channels such as Facebook and Twitter.
Developing an evidence base	- Organise public meetings on weekends and weekdays. - Organise focus groups for example on youth, older people, homeless people, people with disabilities. - Arrange a community survey. - Meet with stakeholders, e.g. community housing providers, developers. - Establish think tanks involving a mix of participants from the local community, business, development industry and service providers. - Use the media to call for submissions and discussion. - Request formal submissions through Council's website. - Partner with service providers to engage with hard to reach groups.
Establishing the scope and focus for a local housing strategy	- Conduct public meetings. - Use newsletters to circulate updates. - Convene focus groups and workshops. - Operate drop-in two-way feedback opportunities at local markets and events. - Distribute printed information. - Put on presentations and invite discussion at Council meetings. - Frame a discussion topic for existing inter-agency networks.
Developing strategies and actions	- Conduct workshops and focus groups, targetting key participants (e.g. developers, local service providers, residents, tenants, youth, older people). - Publish the draft local housing strategy for comment. - Exhibit the draft strategy and provide for submissions and verbal feedback. - Operate drop-in two-way feedback opportunities at local markets and events. - Put on presentations and invite discussions at Council meetings.
Implementation	- Launch the housing strategy and circulate it widely. - Conduct information sessions and provide materials for developers and community organisations. - Follow up with stakeholders formally and informally. - Encourage people to use informal channels for continuing input.
Monitoring and evaluation	- Circulate a regular e-newsletter with a direct feedback mechanism. - Send updates and surveys by social media. - Make the engagement team report against indicators.
Ongoing	- Host and publicise community events relating to housing. - Institute annual awards for housing excellence with community participation in selection. - Organise regular reporting on housing outcomes e.g. an annual scorecard with community input into the scoring process.

Step 2

Developing an Evidence Base

A sound evidence base provides the foundation for determining the issues to be addressed, which in turn point to the focus, objectives and actions for a local housing strategy. Sharing evidence helps build a common understanding of issues and garners support for action. It helps identify opportunities and constraints and informs allocation of resources.

The aim of the evidence base is to build a picture of how the local community operates and the relationship between housing supply and development capacity, demand, needs and affordability.

Suggested Areas for Analysis

- ◆ the demographic position
- ◆ the economic position
- ◆ the supply of housing
- ◆ the cost and affordability of housing
- ◆ opportunities and constraints.

Important data sources include the *Census of Population and Housing*, *NSW Rent and Sales Report* and *Commonwealth Rent Assistance* data. Local and regional planning strategies and studies also provide important contextual information.

The Department of Planning, Industry and Environment (DPIE)'s *Local Housing Strategy Guideline* (<https://bit.ly/2TWJy46>) requires Councils to prepare an LGA Snapshot identifying broader social, economic and environmental factors such as cross-border issues and the transport network and infrastructure required to support housing. Module 3 provides detailed guidance and data to assist in developing an evidence base.



Unless commitment is made
there are only promises and
hopes but no plans.

Peter F. Drucker

Step 3

Setting the Scope and Guiding the Framework

Drawing on analysis of the evidence base and input from the community and stakeholders, Council can establish the focus for the strategy and identify objectives and outcomes it wishes to achieve. Initially Council may choose to concentrate on immediate and pressing issues — for example encouraging severely undersupplied forms of housing or incorporating inclusionary zoning requirements for sites about to be redeveloped — before moving to a more comprehensive approach that addresses the housing needs of the whole community over a longer timeframe.

A strategy can include high level principles and may include a vision and goal, as well as objectives. Making these explicit and stating them upfront gives participants in the policy-making process a common understanding of the outcomes being sought and the basis for

different approaches that may be required to solve the problems identified. It also provides the basis for monitoring and evaluating the effectiveness of the strategy.

Principles may cover the process for developing the strategy and whom it will assist. They can also provide a basis for evaluating different solutions to a problem and allocations of scarce resources.

Principles for Local Housing Strategies

- ◆ **Commitment to providing access to housing that is appropriate and affordable**—all residents of an area should have access to appropriate and affordable housing
- ◆ **Openness and transparency**—all interest groups are engaged in open dialogue about how housing problems are to be defined, what issues are to be addressed and prioritised, what solutions are to be considered, what recommendations are to be made and what solutions are to be implemented.
- ◆ **Fairness and equity**—any costs and benefits of policy outcomes are to be fairly distributed among residents or interest groups, with an emphasis on ensuring that the least well off receive appropriate preference.
- ◆ **Efficiency and effectiveness**—public resources are applied in such a way as to maximise benefits for sums expended.
- ◆ **Simplicity and ease of administration**—measures should be simple to implement and administer and the costs of administration should be held in check.
- ◆ **Sustainability**—solutions that are adopted are sustainable socially, economically and environmentally.

These principles can be adapted to local circumstances (as they have been for example in the Maitland City Council Affordable and Adaptable Housing Action Plan ([http://bit.ly/ 2rIfz9](http://bit.ly/2rIfz9))).

It may be necessary to give one principle precedence over another. For example, simplicity of administration may be compromised to ensure that outcomes benefit the least well-off. Appropriate compromises between conflicting principles may require public debate so that the resulting outcomes are broadly supported.

Goals and objectives should address the issues raised in the housing needs and market analysis, and the problems identified. Goals are broad statements of intent, addressing the problems and harnessing the opportunities that have been identified. For example, where analysis of the housing market shows that not enough choices exist to satisfy different needs and demand, a goal might be “to support successful communities through housing choice, affordability,

other Sources

Other sources that may offer valuable insights and additional information for developing an evidence base include:

- ◆ Insights and information from engagement with key stakeholders and the community
- ◆ Data and information held by Council (for example development and building approvals)
- ◆ Reports and research on specific issues or needs groups (for example, reports published by the Australian Housing and Urban Research Institute)
- ◆ Information and databases produced by state government agencies and industry bodies (for example DCJ, Community Housing Industry Association NSW and Housing Industry Association)
- ◆ Housing targets set out in district/regional plans and DPIE’s Sydney Housing Supply Forecast
- ◆ Infrastructure capacity and any planned and committed infrastructure
- ◆ Social housing waiting times for housing assistance.

adaptability, accessibility and sustainability”. Goals provide an overall direction to orient more specific, practical housing objectives.

For each objective, strategies and actions to achieve that objective should then be identified, along with the basis for measuring success.

Examples of Housing Strategy Goals and Objectives Adopted by Councils

Housing for a diverse population.

*City of Sydney Sustainable Sydney 2030
Strategic Direction*

To encourage the growth and diversity of the residential population by providing for a range of appropriately located housing, including affordable housing.

City of Sydney LEP

By 2031 the City of Ryde Council will be a leading council in Sydney in the provision of affordable housing and an increasing number of key workers in the local economy will live locally.

*Ryde Council Affordable Housing Policy
2016-2031 Vision*

To maintain and increase the amount of affordable rental stock in North Sydney LGA and ensure the long-term sustainability of Council's involvement in affordable housing.

North Sydney Council Affordable Housing Strategy

To support social inclusion and sustainability in the Tamworth region by promoting housing of different type, size and tenure in suitable locations, at a range of prices within the reach of households of varying composition and financial capacity.

Tamworth Affordable Housing Strategy 2011 Goal

Step 4 Developing Actions and Strategies

The planning framework controls where and how much housing can be delivered and influences local amenity and access to transport, jobs and services. Planning mechanisms specifically designed to deliver affordable housing are a potentially effective response to housing issues. Councils' other roles in community services, infrastructure planning and provision, advocacy and facilitation, can also be employed in housing strategies. Indeed, strategies that utilise the broadest range of measures are often the most effective.

Core Roles

Land use planning, community services and infrastructure provision

Revenue collection, administration and enforcement of regulations

Planning Mechanisms

Development incentives

Inclusionary zoning

Tailored planning requirements

Project facilitation

Facilitation and Advocacy

Promotion and information, community education, input to regional and state policy

Use of Council and surplus land, partnerships and joint ventures, awards

Examples of Housing Objectives

Community wellbeing

OBJECTIVE: To promote community wellbeing through better provision of housing to meet diverse community needs.

Housing needs to be recognised as central to community wellbeing to gain the focus it deserves, and to ensure that strategies for its improvement are successful.

Contributing to quality of life

OBJECTIVE: To provide housing and communities that allow people to pursue their goals related to family, work, education, creativity, recreation or other pursuits.

Housing and the communities in which people live often shape the opportunities they have as a result of location and accessibility (to jobs, education and services, for example), the availability of space for particular activities, the capacity for privacy, and so on.

Contributing to sustainability

OBJECTIVE: To promote environmentally, socially and economically sustainable development.

“Sustainable development comprises types of economic and social development that protect and enhance the natural environment and social equity.”*

* Dunphy, D., et al, *Sustainability: The Corporate Challenge of the 21st Century*, Allen & Unwin, Sydney 2000, p. 23.

Access

OBJECTIVE: To ensure that housing is available with adequate access to transport, employment, services and the social and support networks of residents.

Access refers to the proximity of housing to services, employment and commercial centres and the availability of reliable and convenient public transport. Residential neighbourhoods outside central areas should be serviced by regular and efficient public transport. This objective can be more challenging to achieve in regional and outlying areas.

Providing diversity and choice

OBJECTIVE: To provide housing choice by encouraging a diverse range of housing of different types, size and tenure, in suitable locations, at a range of prices within the reach of households of varying financial capacity.

Housing choice refers to a household's capacity to select a home that suits its needs, preferences,

aspirations and financial means. Housing choice requires the availability of an appropriate and diverse range of housing that is accessible to households from different socio-economic groups. An inclusive community is one that offers such choice and diversity.

Providing appropriate housing

OBJECTIVE: To enable households to access housing that is appropriate to their needs.

Appropriate housing meets the needs of residents in terms of size, physical attributes and location. Housing should be of a standard that is safe and not detrimental to residents' health or wellbeing. It should accommodate daily requirements, and allow sufficient space and privacy for all. If household members have special needs, their housing must also accommodate them adequately.

Addressing affordability

OBJECTIVE: To promote housing that is affordable to households of varying financial capacity, especially very low, low and moderate income households.

Affordability generally refers to housing costs that are reasonable in relation to income as outlined in Module 1. The focus is usually on the availability of accommodation that is affordable to lower income households and those having difficulty accessing affordable housing locally.

Encouraging adaptable and accessible housing

OBJECTIVE: To encourage adaptable and accessible housing that can respond to the changing needs of residents and be cost effectively adapted to the specific needs of people with disabilities.

Adaptable housing means housing that can be modified or extended at low cost to suit the changing needs of residents. The aim should be to design and build housing so that it can be adapted for use by “everybody, irrespective of the users' age, level of mobility, health or lifestyle”. As this will have implications for housing costs and land requirements, councils may seek to specify targets for housing that meets Australian Standard AS 1428.1-2001: Design for access and mobility and/or the Livable Housing Design Guidelines (<http://bit.ly/2PHx2CP>) (see further at Module 1.6/8/9).

Core Roles – Land Use Planning, Community Services and Infrastructure Provision

Land use planning, community services and infrastructure planning and provision are core roles for councils. The approach taken, focus and delivery of these functions influence housing outcomes in a number of ways.

Planning objectives within Council's Local Environmental Plan and associated instruments signal Council's intentions and influence outcomes. Examples of housing objectives that can be incorporated in a Local Environment Plan are:

- ◆ To promote a variety of housing (including affordable housing) to accommodate a range of income levels and increase housing choice;
- ◆ To facilitate the development of a broad and appropriate range of affordable housing types by the private sector.

Zoning and local infrastructure provision such as roads and, in regional areas, water and sewerage, determines the amount of land available for housing and influences the range of housing provided, its amenity and cost. Ensuring that adequate land is available for housing restrains prices of residential land and existing housing.

Well planned medium and high density housing development enables more households to benefit from living in accessible, sustainable and liveable environments while conserving land needed for employment uses, agriculture and open space, and preserving sensitive environments. Research shows that denser, well serviced suburbs are not only more environmentally sustainable but better for health. As the Health Foundation pointed out in 2014, residents of “higher density neighbourhoods undertake more walking and physical activity than those living in low density neighbourhoods” (*Low Density Development: Impacts on Physical Activity and Associated Health Outcomes*). Further, sharing the value of uplift between landowners and developers and the community can make it feasible to incorporate affordable housing and enhancements to the public realm and community services alongside housing development.

Community services and facilities that provide support to people close to where they live help to promote inclusion and affordable living. For example, access to childcare assists families, including those with limited means, to get to employment opportunities and meet housing costs. Support services such as mobile libraries, meals on wheels and community buses help older people age in place, and reduce the disruption and cost associated with moving.

Within the core roles of local government, **land use planning levers**, set out in the following table, are available to control housing outcomes. Differences in population, character and density, geography, resources and economic growth influence the housing issues that emerge and the appropriateness of responses.

Strategies and Actions	Purpose	Applicability	Examples
Land Use Planning Levers			
Targets: Set numerical targets for affordable housing outcomes linked to broader housing supply targets and supported by percentage requirements for affordable housing in projects or precincts. As recognised in the Cockburn Coast District Structure plan, “Dwelling mix alone will not be sufficient to ensure a reasonable extent of affordability” (p.38). Government land: Incorporate affordable housing targets in conditions of sale or joint venture partnerships to bind incoming private owners and partners to deliver affordable housing.	To promote affordable housing and enable progress to be measured	Areas with identified need for affordable housing	City of Sydney, <i>Sydney 2030</i>, p.24 Parramatta, <i>Draft Affordable Housing Policy</i> Shoalhaven <i>Affordable Housing Strategy</i> (Module 5: C.S.12); Cockburn Coast District <i>Structure Plan</i>, pp.XV and 37–41, https://bit.ly/2Xyh2Lp Ryde <i>Affordable Housing Strategy</i>
Land supply: Identify requirements for additional housing opportunities for sub-markets and work with state agencies to ensure appropriate zoning and infrastructure.	To promote opportunities to expand provision of undersupplied housing	Where demand exceeds supply	<i>Shoalhaven Affordable Housing Strategy</i> (Module 5: C.S.12).
Review current controls to assess capacity for meeting housing needs. Responses could include: Greater provision for higher density development in areas with good access to transport and services Controls requiring a mix of the number of bedrooms in dwellings Reduced setbacks and smaller lot sizes “Meanwhile use” housing — the interim use of vacant land for temporary housing Limiting short-term holiday rental.	To encourage diverse housing types, improve efficiency (and reduce costs), and increase amount of low cost rental stock	Areas with a mismatch in housing and demand and shortage of low cost private rental housing	Wyong Planning Controls: Background Report 2012; Leichhardt LEP; City of Kingston, Victoria (Module 5: E.13); “Meanwhile use” housing (Module 5: E.14); DPIE Short stay discussion paper. http://bit.ly/2KXYqfk
Housing diversity requirements: Require a mix of dwelling sizes, types and tenures within a development or an area (e.g. within a master-planned development).	To ensure a mix of housing to meet diverse community needs	All areas	Metropolitan Redevelopment Authority Affordable and Diverse Housing Policy Central Perth Redevelopment Area; Landcom’s Universal Housing Design Guidelines.
Protect development opportunities: Ensure new development controls do not dampen potential for future higher density (e.g. by permitting modestly higher densities in areas where high density is appropriate and feasible and thereby impeding future redevelopment at optimum density).	To increase housing supply, and preserve value capture opportunities	Areas with infill or greenfields development proposed	“Smart Growth” principles for compact design, for example: Hismen Hin-Nu Terrace, Oakland, California; Storrs Center, Mansfield, Connecticut.

Strategies and Actions	Purpose	Applicability	Examples
Land Use Planning Levers			
Utilise state planning policies: Assess the impact of state planning policies (e.g. Housing for Seniors and People with a Disability SEPP, AHSEPP). Do the number and form of dwellings being delivered support objectives? Can they better align to local plans? Apply for inclusion in SEPP 70.	To increase diversity of housing and delivery of dedicated affordable housing within new development	Areas where state planning policies apply	Parramatta Draft Affordable Housing Policy (Module 5: C.S.9) Shoalhaven Affordable Housing Strategy (Module 5: C.S.13).
Review the feasibility and cost impacts of development controls. Adjusting Floor Space Ratio, height and parking requirements can improve development feasibility and reduce development costs, e.g. reducing parking requirements in well located areas or for smaller dwellings such as dual occupancy or tiny homes.	To reduce the cost of housing production and end price and encourage development in designated areas	Areas where development opportunities are not taken up, or not considered to be feasible	Tiny Homes Foundation/ Central Coast pilot (Module 5: E.24).
Land audit: Identify surplus sites or precincts suitable for urban renewal and additional housing.	To provide opportunities for meeting supply shortfalls	Areas with a need for housing	City of Darebin, Victoria – “Exploring the Use of Council-owned Land for Affordable Housing”, https://bit.ly/2x4FjcN .
Social housing renewal: Work with state agencies and their partners to deliver affordable housing through renewal of social housing precincts and smaller sites.	To improve social housing and provide pathways out of social housing	Areas with existing social housing in need of renewal	NSW Government Communities Plus, http://bit.ly/2KVLDK9 . City of Sydney and NSW Government – Cowper Street project.
Coordinated housing and infrastructure: Plan early engagement to optimise benefits of infrastructure investment — more housing and economic growth and potential for capturing value uplift.	To provide more dedicated affordable housing with good access to opportunities	Areas with major infrastructure planned	Randwick Council (Module 5: C.S.11).
Value capture opportunities: Establish a value capture matrix which can measure the value capture potential of existing development controls and proposed changes.	To develop a pipeline of dedicated affordable housing	Areas with high land value and development opportunities	VPA Calculator, (Module 4: 4.3.5).

Strategies and Actions	Purpose	Applicability	Examples
Land Use Planning Levers			
Mixed use precincts: Encourage housing options to be linked with employment by enabling mixed use developments and precincts and commercial opportunities close to areas with low cost housing, and/or advocate for transport linkages.	To link housing with work and services and promote sustainable communities	All areas, particularly those with less access to work	Highlands' Garden Village, Denver, Colorado (Module 5: C.S.6), http://bit.ly/2RCpcMu .
Sustainability benefits: Consider developing a ratings tool to measure ongoing housing affordability of developments (e.g. sustainable features — orientation, dwelling size, insulation, water reuse).	To reduce ongoing housing costs and improve residential amenity	All areas	Melbourne City Council (http://bit.ly/2zLAKQk) and the National Australian Built Environment Rating System (NABERS).
Social impact assessment: Require social impact assessment for proposed developments to reduce loss of low cost accommodation and mitigate impacts (e.g. by cash contribution or support to relocate tenants).	To prevent homelessness of vulnerable groups	Areas with low cost rental that are to be redeveloped	Port Macquarie example (Module 5: E.18).

Strategies and Actions	Purpose	Applicability	Examples
Community Services and Infrastructure Provision			
Community strategic plan: Incorporate housing objectives in Council's community strategic plan.	To prioritise and communicate housing objectives	All areas	City of Sydney (Module 5: C.S.14), http://bit.ly/2ATR1sN .
Infrastructure to support housing: Coordinate approval from state agencies to ensure water, electricity, sewerage and telecommunications services are available to facilitate greenfield residential development. Augment local infrastructure to attract business investment and support viability of existing businesses.	To increase the amount of housing in an area and support new and existing businesses	All areas, particularly areas with lower economic growth and residential development	Oran Park, Camden LGA, http://bit.ly/2StRx7R .
Local economic development: Prepare a local economic development policy and/or strategy to generate more employment opportunities for local residents — this could include providing incentives for businesses to start up or relocate, such as waiving rates/fees.	To generate employment opportunities for low income households and promote sustainable communities	Areas with affordable housing but limited employment options	Port Macquarie Hastings Economic Development Strategy 2017–2021, http://bit.ly/2zIQw58 .

Strategies and Actions	Purpose	Applicability	Examples
Community Services and Infrastructure Provision			
Align local infrastructure planning — such as road improvements, parks, landscaping of commercial districts, crime reduction, street lighting, cycleways — with housing objectives; e.g. improved footpaths, main street landscaping, seating and lighting where the population is ageing.	To promote liveability	All areas where infrastructure is identified as a gap in supporting housing need	Blacktown Council Crime Prevention Through Design Draft Strategy 2017-2021. NSW Police Crime Prevention through Environmental Design Checklist, http://bit.ly/2CfCYyj .
Access to work: Ensure there are sufficient day care places for children to support single working parents.	To enable families to afford housing and commit to ongoing rent or mortgage payments	Areas with a shortage of affordable childcare and high unemployment	Port Macquarie Hastings Council, <i>Social Strategy 2013–17</i> .
Access to facilities: Prepare a policy that commits to promote inclusive and compassionate access to public spaces and community facilities.	To guide council and community responses to people who are homeless	All areas, but a priority where homelessness is an issue	Liverpool City Council and Tweed Shire homelessness policies.
Support access to community centres and community hubs for vulnerable groups or those with limited access to facilities such as residents of caravan parks and social housing tenants.	To enable low income households to get access to services, and participate and connect with their communities	Areas with low income households and need for services and support	City of Burnside, South Australia, http://bit.ly/2BU8HGL .
Suitable contributions: Ensure local infrastructure contributions plans are in place and regularly updated to maximise funds for local infrastructure without impeding development.	To provide for new residential developments to have sufficient infrastructure (e.g. community facilities and open space)	Areas with planned growth and development, particularly rapid growth areas	VPA Calculator (Module 4: 4.3.5)
Information on how to assist: Include links to housing providers and support services in Council's community services register.	To make available the help people need to maintain housing or access more affordable housing	All areas	Inner West Council Website, https://bit.ly/2FszSes . Yarra City Council, Victoria, http://bit.ly/2RE8Fb2 .

Planning Mechanisms to Promote Affordable Housing

The term “planning mechanisms” is used to refer ways of using planning powers specifically to promote affordability and accessibility. Measures identified as planning mechanisms generally fall into three groups:

- ◆ Voluntary mechanisms which offer some kind of incentive to include or maintain affordable housing;
- ◆ Mandatory requirements that make inclusion of affordable housing a prerequisite for development;
- ◆ Impact fees and restrictions to offset the loss of existing affordable housing.

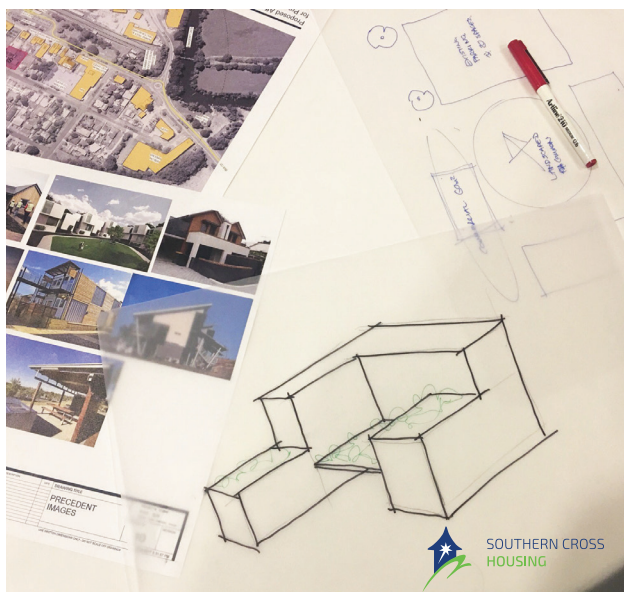
Councils can utilise voluntary approaches such as voluntary inclusionary zoning and voluntary planning agreements for affordable housing and, in certain circumstances, mandatory planning mechanisms, such as mandatory inclusionary zoning, and measures to protect existing housing stock.

VOLUNTARY MECHANISMS

Development Incentives

Voluntary approaches most commonly involve some kind of incentive such as a bonus floorspace or height allowance or a relaxation in controls or requirements. Bonuses and other variations to planning standards may be applied to the whole development or only to the affordable housing component. Voluntary Inclusionary Zoning usually involves a council signalling that it is seeking a certain component of affordable housing as part of development and providing developers with the option of utilising a specific planning incentive or concession, such as a density bonus, in return. Sometimes concerns are raised that allowing density bonuses or other variations to planning standards will undermine the integrity and/or intent of the planning framework. However, the rationale for a variation of standards is that it is acceptable in limited circumstances because of the nature of the housing involved and/or the community benefits it provides. (See Gurran et al at <https://bit.ly/2XdvjJZ>, page 18)





Tailored Planning Controls for Affordable Housing

Requirements such as restrictions on the development of smaller dwellings, minimum unit sizes and restrictive covenants that require expensive materials can impede the production of affordable housing. Housing features that do not provide value to the residents can add unnecessarily to housing costs and undermine affordability. The need for particular features may vary with housing size and type. For example, residents of community housing and other types of subsidised affordable housing generally have lower rates of car ownership and so there is less need for on-site parking and greater need for access to public transport.

For these reasons, it is desirable to offer flexibility in the application of planning controls for affordable housing and other types of accommodation designed for specific needs, such as housing for people with disability. This approach may be complemented by adopting performance-based graduated planning standards, which can increase site yield and facilitate the provision of affordable housing, by linking planning requirements with dwelling size for instance. Examples include open space standards that increase proportionally to the size of the dwelling or the number of bedrooms and parking requirements that reflect the accessibility of the location and the needs of future residents.

Project Facilitation

Councils may provide incentives to non-profit housing providers and private developers to facilitate provision of affordable dwellings. Incentives in the form of facilitations and concessions may be designed to provide more affordable rental housing managed by a community housing provider or may be tied to a requirement for units to be sold or rented for a specified period to an eligible low to moderate income household. For example, a council or other consent authority may dedicate staff to expedite certain classes of applications thus reducing the applicant's holding costs, or a case manager to deal with affordable housing applications or applications by community housing providers. Other facilitation measures include linking community services planning with housing provision and assisting with brokering partnerships between local businesses and community housing providers. Concessions may include measures to reduce development costs and reduce on-going operation costs, such as a reduction in council rates, to streamline the development approval process.

Reducing barriers to affordable housing projects is another important form of facilitation. To be effective, this requires liaison with affordable housing proponents to identify the roadblocks to development. Some could be statutory planning impediments, while others may be community resistance.

Implementation of Voluntary Mechanisms

Voluntary mechanisms are commonly implemented through inclusionary zoning and voluntary planning agreements. The Affordable Rental Housing SEPP also provides an incentive framework for identified housing developments (see 1.7.2 for further details).

Voluntary Inclusionary Zoning

Voluntary inclusionary zoning usually involves a council signalling that it is seeking a certain component of affordable housing as part of development and in return providing developers with the option of utilising a specific planning incentive or concession, such as a density bonus.

Voluntary Planning Agreements

Under a voluntary planning agreement between a developer and a planning authority such as a local council, a developer may agree to provide or fund affordable housing or other public benefits. Voluntary planning agreements for provision of affordable housing are enabled by section 7.32 of the NSW *Environmental Planning and Assessment Act 1979* which envisages that a developer may agree to:

- ◆ Dedicate land free of cost, and/or
- ◆ Pay a monetary contribution, and/or
- ◆ Provide another public benefit for a specific purpose.

Agreements may be entered into at the development application or rezoning application stage, particularly in circumstances where permissible heights or densities are being increased.

MANDATORY MECHANISMS

Mandatory Inclusionary Zoning requires that a component of affordable housing be included when land is developed or redeveloped, or that a monetary contribution be paid in lieu of the direct provision of housing. Mandatory inclusionary zoning is supported by planning legislation in all local government areas under State Environmental Planning Policy No 70 Affordable Housing (Revised Schemes). See 1.7.2 for further details.

IMPACT FEES AND RESTRICTIONS

The main mechanism for protecting existing affordable housing is Part 3 of the *Affordable Rental Housing SEPP*. Part 3 establishes an assessment process for proposals in the greater metropolitan region that affect low rent flats or certain boarding houses, to mitigate the negative impact on existing affordable rental housing. A formula is provided for calculating a monetary contribution to help offset the loss of low rent residences.

Outside NSW, impact fees are used in some jurisdictions to offset impacts created by new development such as an increased need for affordable housing or the loss of existing housing as a result of the development.



SELECTING PLANNING MECHANISMS

The local housing market, land values and the type of development occurring in the area determine which planning mechanisms are most effective. Outcomes of all the mechanisms are most favourable where there is a lot of development going on.

It is difficult to compare the effectiveness of different mechanisms because of the many variables that come into play. They include the way mechanisms have been applied, whether the approach was introduced alongside up-zoning, the timing of introduction relative to periods of economic prosperity and/or construction activity, the duration of application, whether a mechanism has been applied in combination with other incentives and how actively housing outcomes have been pursued (which may be influenced by both Council commitment and community acceptance).

Mandatory inclusionary zoning is potentially more effective than voluntary measures, particularly in higher land value locations with large sites, and areas with capacity for up-zoning and redevelopment, and where it is applied across an LGA as proposed by the City of Sydney.

The following table compares some of the mechanisms available to local government to facilitate housing.

Strategies and Actions	Purpose	Applicability	Examples
Planning Mechanisms and Facilitation			
Value capture: Identify opportunities for value capture and determine the most appropriate lever (SEPP 70, VPA or bonuses/incentives).	To target dedicated affordable housing at low and moderate income households	Areas with housing need, where value capture is feasible, i.e. with sufficient development uplift and underlying land values	See Urbanista Report “Facilitating Affordable Housing Through Planning Mechanisms at www.urbanista.com.au , (http://bit.ly/2svDwLS).
Signal inclusionary zoning: Determine that a proportion of affordable housing is to be sought by Council in greenfield or large-scale developments. If the LGA is not covered by SEPP 70, this would be through voluntary inclusionary zoning.	To provide affordable housing	Areas with greenfield or large developments outside SEPP 70	Yarra City Council, Victoria, Policy Guidance Note on Affordable Housing in Significant Redevelopments, http://bit.ly/2KXfkdN ; Clarence Valley Case Study (Module 5: C.S.5).
SEPP 70: Identify areas for development uplift where it is feasible to levy affordable housing contributions.	To provide dedicated affordable housing	High value/high need locations where increased density is proposed	Randwick Council (Module 5: C.S.11).
Voluntary Planning Agreement policy: Develop a policy to encourage and guide private developers interested in incorporating affordable housing.	To provide dedicated affordable housing	Areas with development opportunities	Canada Bay Council (Module 5: C.S.4).
Implementation policy: Establish an implementation policy for delivering affordable housing – including roles and responsibilities of Council and community housing providers associated with receipt of contributions and holding funds, housing delivery, ongoing asset and tenancy management.	To manage affordable housing efficiently, affordably and transparently	All areas where affordable housing projects are proposed	Willoughby and Canada Bay, case studies (Module 5: C.S.18 and C.S.4).
Density bonuses: Provide for inclusion of additional affordable housing when formulating Floor Space Ratio controls to enable density bonuses.	To increase supply of low rent housing in higher cost areas with capacity to support additional housing yield	Areas with capacity to support additional development yield	Waverley Council (Module 5: C.S.16); Ashfield Town Centre – See Inner West example (Module 5: E.11); Fremantle Local Planning Scheme 4, https://bit.ly/2VYdMFD

Strategies and Actions	Purpose	Applicability	Examples
Planning Mechanisms and Facilitation			
Graduated planning standards: Apply performance-based planning controls linked for example to dwelling size or occupant requirements.	To increase site yield and facilitate the provision of affordable housing	All areas	Proposed in Maitland City Council, http://bit.ly/2r1lfz9 . Affordable and Adaptable Housing – Action Plan, 2013.
Dedicated planning officer: Nominate an officer to focus exclusively on supporting housing applications or to have a dedicated housing focus along with other duties.	To develop capacity within Council and provide stakeholders with a point of contact	Areas where housing strategies are to be implemented	City of Port Phillip, Victoria (Module 5: C.S.10).
Fast-track development assessment in conjunction with local or joint regional planning panels, for affordable housing projects.	To reduce costs associated with holding land and construction, and improve project viability	Areas providing opportunities or incentives for affordable housing	City of Kingston, Victoria (Module 5: C.S.13), http://bit.ly/2riCVNc .
Reduced fees: Set lower fees such as development application fees and infrastructure contribution charges for defined affordable housing projects. Ongoing rate relief may also be considered.	To improve project viability and generate cost savings to support additional affordable housing	Areas with a housing need	Brisbane City Council fee reductions for student and retirement accommodation, eligible community organisations. City of Sydney, Rate reductions for affordable housing provided by City West Housing Ltd.



Advocacy, Partnerships and Support

Councils are well placed to advocate for change and influence other levels of government. Councils participate in state and regional planning, interact with multiple stakeholders and have systems and processes which can be employed to help drive outcomes. Councils can also encourage better housing outcomes by promoting housing issues and responses across all corporate functions, by bringing players together and by playing active roles in affordable housing provision by using their own resources such as land.

The following table compares opportunities councils have to engage in advocacy, partnerships and support.

Strategies and Actions	Purpose	Applicability	Examples
Advocacy, Partnerships and Support			
Engage with communities, businesses and developers to build awareness and gather information.	To inform the strategy and build support for housing strategy	Areas with unmet housing needs and issues	Wyong Housing Strategy 2008; Parramatta Draft Affordable Housing Policy 2017 (Module 5: C.S.9).
Sponsor information sessions, public forums, research, affordable housing conferences.	To build understanding of issues and support for planned actions	Areas in which a response to housing needs and issues is being planned	City of Sydney Sustainable Sydney 2030. http://bit.ly/2UjJeNO
Establish databases and resources on housing needs and strategies for the community, developers and other stakeholders.	To communicate evidence, help monitor and communicate progress and need for adjustments	Areas with limited data and information on housing issues	Melbourne City Example (Module 5: E.15).
Build partnerships with CHPs for example Council can enter into memoranda of understanding with specific local CHPs.	To harness expertise and resources, and build capacity for creating shared value	Areas where CHPs are active and can help identify issues and responses	Armidale Council and Homes North (http://bit.ly/2RCNg27) Clarence Valley Case Study (Module 5: C.S.5).
Support non-profit real estate enterprises.	To encourage use of empty dwellings; To expand rental diversity and supply	Areas with empty dwellings and absentee owners	City of Melbourne sponsorship of HomeGround http://bit.ly/2FjLlwV ; HomeGround Real Estate Sydney http://bit.ly/2AWryyT ; Echo Realty http://bit.ly/2zKc1SN
Publicise progress on the strategy in Council's website and annual report.	To demonstrate commitment and accountability	Areas where a strategy is in place	Western Australian Government Progress Report provides Local Government examples http://bit.ly/2PoaB5s ; City of Sydney Annual Report Operational Plan Quarter 4 Report 2017/18. https://bit.ly/2RVpS2U

Strategies and Actions	Purpose	Applicability	Examples
Advocacy, Partnerships and Support			
Establish awards for excellence in housing design and outcomes.	To encourage innovative, well designed projects and build community acceptance	All areas	Waverley Council's awards (http://bit.ly/2E6ogMq) could be expanded to include housing.
Provide seed funding to innovative projects or approaches.	To encourage cross-sector collaboration, e.g. by philanthropists, commercial developers, architects, urban planners, CHPs and government	All areas	Melbourne Lord Mayor's Charitable Foundation's Affordable Housing Challenge. http://bit.ly/2QcXSrE
Advocate for additional housing resources , social housing provision and homelessness services, at other levels of government.	To respond to supply gaps and address housing need for lower income and vulnerable residents	Areas with unmet housing needs – most locations	City of Sydney http://bit.ly/2ro8cyg
Establish or join a housing fund to pool resources obtained from council and other contributions, planning mechanisms and other sources. These could be pooled with neighbouring councils under an agreed policy or protocol.	To hasten delivery of affordable housing	Areas where there is capacity to collect contributions from disparate sources, usually growth areas	Yarra Affordable Rental Housing Development Fund (http://bit.ly/2KXfkdN) 2009–2012 as a means of leveraging of government growth funds (e.g. Nation Building Economic Stimulus Plan).
Review government-owned land to identify surplus and under-utilised sites for pilot projects.	To provide opportunities for CHPs to partner to develop affordable housing	Areas with shortages of land for housing projects	Byron Shire Affordable Housing Initiatives; Various Victorian councils see summary at Affordable Development Outcomes. http://bit.ly/2UiisoV
Contribute or sell land to CHPs at subsidised rates for development of affordable housing.	To provide dedicated affordable housing	Areas with housing need, surplus land and active CHPs	City of Sydney (Module 5: C.S. 14) and Byron Bay (Module 5: E.3).
Bid for funding grants that can be used to deliver affordable housing and/or supportive infrastructure e.g. SAHF/ DCJ Community Grants (see Module 5).	To maximise available resources and generate housing	Areas that meet program criteria, including requirements for ownership by CHPs	DCJ programs.

Responding to the Local and Regional Context

The choice of strategies and actions may be informed by developing an opportunities map – a process which helps identify where and which strategies will be most effective. Progressing short term actions while a fuller strategy is developed may be an option if there are immediate opportunities.

Scoping known constraints at an early stage can also help focus strategies and timeframes.

Constraints can include:

- ◆ Policy and legislative constraints (e.g. SEPP 70 may not be applicable in lower value, low growth locations);
- ◆ Limited resources and capacity (e.g. availability of staff to undertake the work, a need to build expertise required to implement new approaches);
- ◆ Economic and market cycles (e.g. economic downturns that can exacerbate housing issues).

Module 3 provides samples for different regional contexts illustrating the actions and strategies that might be included in a local housing strategy.

Opportunities

Opportunities both short and long term may arise as a result of:

- ◆ Areas or precincts being planned or under review (e.g. greenfield areas, renewal of existing areas);
- ◆ Availability of funds or resources (e.g. developer contributions, other government programs);
- ◆ Newly emerging development or infrastructure projects (e.g. new hospitals, and correction facilities);
- ◆ Private sector development activity or large scale government initiatives (e.g. Western Sydney Airport, Sydney Metro).

Step 5 Implementation

Developing an Implementation Plan

Too often strategies fail to be implemented because other council strategies or policies do not align well with them, resources are insufficient for implementation or employees and stakeholders fail to engage. Time invested in upfront planning and project development can minimise costly mistakes and delays, and disengagement of participants.

An implementation plan sets out the sequencing and timing, and identifies dependencies and the resources required. For example, progress on some actions may require legislative change, while others may require further community consultation. For new partnership approaches, council will be interested in understanding legal and financial implications and this may require establishment of policies and protocols. The Queensland Government's Housing Strategy 2020 Implementation Plan (<http://bit.ly/2BSI7x7>) for example sets out the expected outcomes, deliverables and timing for actions in the strategy.

An effective way to implement a housing strategy can be to identify short, medium and long term actions. The strategy may initially be limited in scope to take into account early opportunities for action where resources and capacity are in place to act, or where significant development activity is proposed, with other

**A goal without a plan
is just a wish.**

Antoine de Saint-Exupéry

questions to Consider

- ◆ Who will actually deliver the strategy and actions?
- ◆ Who will depend on the delivery?
- ◆ Who is accountable for the delivery?
- ◆ Who are the stakeholders?
- ◆ What do they need to know about delivery?
- ◆ Which relationships are critical to success?
- ◆ What are the risks facing the strategy?
- ◆ What skills, capabilities and resources already exist in council?
- ◆ What other skills are needed and how might they be sourced?
- ◆ How quickly will decisions need to be made to ensure the strategy meets its timeframes?

strategies and actions added later. Timing may also be driven by statutory and other requirements such as annual budgets and infrastructure plans, ten year Community Strategic Plans and DPIE timeframes.

Project Governance

Clear and effective governance arrangements are critical to success and time must be taken to consider whether or not existing governance and project management systems will suffice. Governance arrangements become more complex if there are multiple and diverse agencies and stakeholders involved.

There should be clear accountability for the strategy and for specific actions. It is likely that all areas of Council will have some responsibilities for implementation and these should be clearly defined. These accountabilities should be incorporated into staff work plans and performance reviews. It may therefore be appropriate to consult across council teams and divisions when developing the governance arrangements.



The *Cabinet Implementation Toolkit 2 Governance* developed by the Department of Prime Minister and Cabinet identifies elements of an effective governance structure:

Transparency	The roles and responsibilities of each person or group involved are clearly defined, agreed to and documented. Conflicts of interest are addressed on an ongoing basis. Decisions are documented, and minutes and reports of decisions are circulated among team members and stakeholders.
Leadership	The senior executives in all areas with a policy or delivery interest agree on a clear outcome and demonstrate a shared commitment to the governance arrangements.
Accountability	There is a shared understanding of where the buck stops and defined reporting and review arrangements. The senior officer has adequate authority and time to dedicate. Other team members have the delegations and authority they need to carry out their responsibilities.
Efficiency	Processes are designed with efficiency in mind. Processes that require duplication of effort are minimised and there is a focus on achieving results.
Responsiveness	The arrangements facilitate fast and proactive management and escalation of issues, risks and disputes to the right person or body for resolution. Arrangements are reviewed regularly and can be adapted as implementation moves forward.

Risk Management

The aim of risk management is not to entirely avoid risks but to identify and assess the strategies to manage them. Strategies typically have long timeframes and need to weather hurdles that may arise from political processes, policy and legislative reviews, changing resources and other factors.

Without some level of risk management councils will be less likely to consider new and innovative approaches. Risk mitigation strategies such as pilots and staged implementation provide opportunities to identify risks and to review and refine approaches. A positive risk culture also guards against over-optimistic views of a strategy and being blind to vulnerabilities and obstacles. Most councils have risk management frameworks, which include a risk management process, risk register, risk profile and mitigation measures.

The risk management component of an implementation plan should be commensurate with the levels of risk involved and where appropriate, link with Council's general risk management framework. It should build in a process for reviewing performance of the strategy and monitoring identified and emerging risks.





Step 6

Monitoring, Review and Evaluation

Why are they Important?

An effective monitoring and evaluation framework allows a council to:

- ◆ assess what is working and what is not
- ◆ adjust strategies and actions
- ◆ consider new issues or opportunities that may have arisen.

Monitoring helps communicate progress made to key stakeholders and maintain support for a strategy. It provides evidence for adjustments that may be needed, indicating for example whether the level and use of resources are appropriate. It can also support additional opportunities that may arise during implementation such as bids for funding. Monitoring provides data to support evaluation.

Monitoring Outcomes

Establishing key performance indicators (KPIs) and collecting quantitative data and qualitative information provide a baseline for assessing progress and outcomes. KPIs can include timeframes for implementing actions as well as housing outcomes, for example changes in rental supply and affordability. They should be simple, measurable, actionable, timely and visible.

Common problems that can impair monitoring and review include inadequate resourcing, lack of a systematic planning approach, and irrelevant or insufficient data.

Developing a housing strategy dashboard which tracks progress relative to identified targets can be an effective way to monitor implementation, improve performance and ensure accountability.

Evaluation

The timeframe for evaluation will depend on the actions and strategies involved. Some actions, particularly those relating to housing supply and diversity may have long lead times especially if they depend on legislative change or industry responses requiring financing, design and construction. Capacity to separately measure and evaluate the impact of Council's actions and strategies—when other factors (such as taxation, inflation and employment) also influence housing outcomes—should be built into the evaluation framework.

Evaluation Guidelines

The NSW Government Program Evaluation Guidelines (<http://bit.ly/2E2qJaN>) identify nine principles to underpin best practice:

- 1 Build evaluation into your program design.**
Plan your evaluation before you implement a program to ensure the program has clearly defined and measurable outcomes.
- 2 Base your evaluation on sound methodology.**
Use methodologies suited to the program's size, significance and risk.
- 3 Include resources and time to evaluate.**
Consider the required evaluation resources and timeframe when planning the project. Ensure evaluation findings will be available when needed to support decision-making.
- 4 Use the right mix of expertise and independence.**
Choose evaluators who are experienced and independent from program managers, but always include program managers in evaluation planning.
- 5 Ensure proper governance and oversight.**
- 6 Be ethical in design and conduct.**
Carefully consider the ethical implications of any evaluation activity, particularly collecting and using personal data, and potential impacts on vulnerable groups. You may need formal review and approval from an ethics committee certified by the National Health and Medical Research Council.
- 7 Be informed and guided by stakeholders,**
including participants, government and non-government staff and senior decision makers.
- 8 Consider and use evaluation data meaningfully.**
Include clear statements of findings for consideration in evaluation reports. Use reports to inform any decisions about changes to programs.
- 9 Be transparent and open to scrutiny.**
Publicly release key information about all aspects of the evaluation unless there is an overriding public interest against disclosure. This could include methodologies, assumptions, analyses and findings.