

### **Key Issue**

**Competition is reduced by the lack of a focus on implementation** in Planning Schemes and the provision of critical infrastructure elements by capital works (either by state or local government), such intersections and entry roads, stormwater management, external sewers and water connections is left out. Typically levies (or rebates for works constructed by developers eg SIC, S94 & rebates for trunk sewers & water mains in NSW) cost from \$32,000/lot to over \$50,000/lot. Typically landholdings close to city fringes range from 2ha to 4ha eg yielding 30 lots to 100 lots. Developments of this size require all road, drainage & service connections close by as total infrastructure levies due (and therefore value of works that can be provided economically) is limited to \$1m to \$3m.

### **Response to Key Issues in December 2010 Paper**

My response is specific to 2 issues identified as significant:-

- What ways in ..... Government processes restrict for land and its use; and
- What are some ways that Government could address anti-competitive practices in planning, zoning and DA systems.

**The issue is there is currently only limited processes that deliver critical infrastructure 'up front' to groups of the smaller land holdings. This restricts the land use leaving amalgamation of parcels as the only option for a viable development. This delays the implementation:- and**

**The remedy is that works covered by levies (SIC, S94 etc) be forward funded by Government Capital Works Programs** immediately after rezoning and therefore allow DA's and development of small holdings to become viable (30 to 100 lots eg the typical city fringe holding). Note that Authorities are currently holding in excess of \$500m of developer levies unspent.

### **Supporting Information**

Consider the following possibilities:-

- Typically smaller owners and builder/developers deliver lower value product than 'master planned' and well marketed development delivered by large national developers;
- Basic economics shows a correlation between lack of supply and affordability;
- Since the mid 1980's planning has got more difficult & developers have tended to consolidate into larger national corporations;
- Alternatively during the 1980's and 1990's rezoning and development releases have focused on larger 'brownfield and greenfield' sites (that are now largely exhausted) and affordability during the period has declined.

The purpose of this comment is to alert this critical element of the process that is currently outside the planning process and typically split between separate state. local government road, stormwater and service authorities responsibility.

Consideration of implementation as a critical element of the planning and delivery process is critical to enhancing competition and affordability.

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