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Dear Sir/Madam

### **Draft State Planning Policy 3.6 Infrastructure Contributions and accompanying Guidelines**

Thank you for the opportunity to provide feedback in relation to the Draft State Planning Policy 3.6 Infrastructure Contributions and its accompanying Guidelines.

Ensuring the effective coordination of infrastructure and development is critical to the liveability of our communities and also the success of our economy. Yet despite the importance of infrastructure delivery, there has been a lack of transparency and accountability in the management and operation of many local government authority development contribution schemes. This, together with the complexity of administering schemes, means that significant quantities of monies that have been collected have sat idle rather than being invested in infrastructure to benefit our communities and economy.

Through DCP's local governments are holding and spending funds on behalf of landowners. Funds collected should be considered to be held in trust as these funds are being held on behalf of other parties. However, it would seem that some local governments view the funds collected in a similar way to the way rates revenue is viewed and losing sight of the fact that the money collected via a DCP actually belongs to landowners.

There are substantial flaws in the formulation of some currently proposed Developer Contribution Plans (DCP) which, if approved, will see charges potentially in excess of \$80,000 per lot being levied effectively rendering development uneconomic. This means the infrastructure the DCP's are designed to facilitate will not be delivered, making the whole DCP exercise hypothetical in some instances.

Furthermore, despite falling infrastructure construction and englobo land costs, the limited oversight and scrutiny of the operation of local government development contribution schemes has meant that development contribution scheme costs have escalated, irrespective of market realities. These scheme cost escalations, have been to the detriment of housing affordability.

Given the commonality and significance of these issues to the property development industry, the Urban Development Institute of Australia (UDIA), the Property Council of Australia (PCA) and the Real Estate Institute of Western Australia (REIWA) have prepared a joint submission responding to the draft SPP3.6 Infrastructure Contributions and its accompanying Guidelines.

UDIA, PCA and REIWA acknowledge the commitment made by the WA Planning Commission and the Department of Planning; Lands; and Heritage in seeking to address the issues regarding Development



Contributions Plans (DCPs) through the release of the draft State Planning Policy. In particular, with a stronger emphasis on the management and administration of DCPs, the draft Policy responds effectively to many of the current issues regarding the operation of DCPs. The policy's principles are sound and supported, however it is vital that these principles, particularly ensuring that the 'need and nexus' test is satisfied and are re-enforced in the application of the policy and suitably monitored. In addition, the application of infrastructure contribution caps and the removal of the previously proposed 'value capture' element relating to METRONET is prudent given the weakness of the market and its ability to withstand further cost increase pressures.

Whilst warmly welcoming the release of the draft policy, we respectfully recommend that the following areas be addressed in order to improve the implementation of the draft policy and ensure the effective delivery of community infrastructure.

### ***Transparency, Compliance and Enforcement***

UDIA, PCA and REIWA strongly support the draft Policy's principles and increased focus on improving transparency and accountability in the operation and administration of DCPs. Requirements for an annual/status report and annual 'review of infrastructure cost estimates' are welcomed and will help ensure that cost estimates remain accurate, reducing the need to provide refunds at the closing of DCPs. To ensure that annual reports remain accurate and compliant with the provisions of the draft SPP, it is critical that DCP annual reviews are externally audited and reviewed by the WAPC. Landowners, and those contributing funds should also be fully engaged.

Nevertheless, a key area of concern is that the draft policy fails to set out how compliance with its requirements will be enforced. No penalties for failing to comply with the policy are included or a mechanism for aggrieved landowners to escalate complaints.

The key weakness of the existing policy is the lack of local government compliance. Unless this is appropriately addressed, the draft policy is also likely to fail to achieve its objectives. UDIA, PCA and REIWA suggest that a panel or sub-committee of the WAPC is established to retain oversight of the establishment and operation of local governments' DCPs. Alternatively, an ombudsman be established to investigate complaints and provide independent advice to the State and local governments. This sub-committee or ombudsman should be afforded suitable powers to ensure compliance, including the ability to extinguish schemes where compliance with the annual reporting requirements has not occurred. To provide transparency and improve accountability, any actions taken by sub-committee or ombudsman with respect to local government performance should be publicly reported.

However, despite the need for appropriate enforcement measures, it is also important to acknowledge that DCPs are complex, both in establishment and operation. Administering DCPs effectively requires a highly specialised and multi-disciplinary skill set, that unfortunately many local governments currently lack. To help overcome these issues, a 'panel of experts' should be made available to assist local governments in the preparation and operation of schemes, including the annual review process. This advice could either be provided directly from the suggested WAPC-DCP sub-committee or alternatively from a panel of experts selected by the WAPC or its sub-committee,

similar to the recently appointed, multi-disciplinary State Design Review Panel. Any administrative fees associated with this process could then be included within the DCP's administration charges.

If required, we would support the adoption of additional legislation, either under the provisions of the Planning and Development Act, or Local Government Act to ensure compliance with the policy.

#### Recommendation

- That a sub-committee of the WAPC is established to oversee and monitor the ongoing operation of local government DCP's.
- A panel of experts is established to support the administration of DCPs.
- Sanctions for noncompliance with policy regarding the management of a DCP policy be clearly articulated.
- Methods for aggrieved landowners to object to the operation of a DCP be clearly outlined.

#### ***Ensuring Equity and fulfilling the need and nexus test***

The need and nexus, and equity principle that *"infrastructure contributions should be levied equitably from all identified stakeholders within a contribution area"* is strongly supported and integral to the success of DCPs. In support of this, the Guidelines state that *"Other streams of funding need to be considered prior to seeking infrastructure contributions beyond that which is a standard contribution, including... local government property rates and special area rates"*.

However, whilst these principles of the draft policy are clearly expressed, how these objectives will be achieved in practice is less clear and far from certain. If the application of the policy is to be successful, it is fundamental that local governments are able to demonstrate and ultimately provide their fair share of the infrastructure costs. For example, if development increases the population by 40% within the infrastructure catchment area, then local government will need to provide 60% of the infrastructure contributions. Similarly, contributions for regional infrastructure should be matched with contributions from the catchment area and/or State Government. This should also happen early in the timespan of the DCP, given that this community is already established, and local governments have been collecting rates from these residents. This will help to ensure that there is partnership between development proponents and local governments, helping to avoid the 'gold plating' by local governments and encourage the investigation of alternative solutions to challenges such as service relocations.

To help achieve this and safeguard the application of the draft policy's principles, we strongly recommend that the infrastructure contributions levied from all identified stakeholders be included in the 'Cost Apportionment Schedule Template' and reported accordingly.

#### Recommendation

- That the draft policy sets out clear 'need and nexus' and equity requirements including the requirement that local governments provide and report on their contributions.

#### ***Funding Pool for the Timely Closing of Schemes***

DCPs often fail to deliver infrastructure or be completed within a timely manner because of the unwillingness of a small number of landowners, or often that of an individual landowner to develop their land. As such, situations regularly arise where 80% or more of DCP funds have been collected, effectively from the newly established and operating community, however the necessary infrastructure required to support that community has not been provided.

To resolve this issue and ensure that delivery timeframes do not become unreasonably prolonged, we encourage the Government to explore the establishment of a central ‘DCP infrastructure funding pool’. Local governments could then apply for a loan from this pool to finalise DCPs that are close to being complete but are prevented from doing so due to the failing of a land-owner or small number of owners to develop. Interest charges could then be levied against those landowners failing to develop their land in a timely manner. This would effectively establish a quasi-value capture model that would help prevent landowners from failing to release their lands in a timely manner in order to receive windfall land price gains resulting from DCP infrastructure investment. If the WAPC are minded to consider such an option, we welcome further industry engagement to ensure its successful application in practice.

#### Recommendation

- A central, DCP funding pool is established to support the finalisation of schemes close to completion.

#### ***Specific Comments***

To ensure that operation of the draft Policy is effective and efficient in responding to the infrastructure needs of our current and future communities, we respectfully offer the following advice and recommendations regarding specific components of the draft policy and its accompanying guidelines:

### **Draft State Planning Policy 3.6 Infrastructure Contributions**

#### ***6.3 Where Infrastructure Contributions can be sought***

UDIA, PCA and REIWA do not support the collecting of contributions for “*the total replacement of infrastructure once it has reached the end of its economic life*” as this is contrary to the ‘need and nexus’ principle that the policy is founded upon.

#### Recommendation

- The policy is explicit in stating that DCP funding contributions cannot be collected for the replacement of existing infrastructure.

#### ***6.6 Variable and maximum costs levied***

UDIA, PCA and REIWA strongly support the pragmatic maximum per dwelling levies that the policy includes. These limits will help to ensure that housing within DCP areas remains affordable to all members of the community. This will also help to ensure that local governments carefully consider their infrastructure requirements, avoid the ‘gold plating’ of infrastructure and explore all

infrastructure funding options available. Any lifting of these caps would unfairly burden the cost of providing new infrastructure squarely at new home buyers. Therefore, it is important that the proposed limit 'is a limit', supported by regulation if required.

It is also not in Councils' interest to insist on 'gold plated' infrastructure as these often increase maintenance costs, which are borne by ratepayers, not homebuyers. Too often this is not realised at the time infrastructure decisions are made. Any costs beyond the identified cap should be sourced through alternative means, particularly through rates revenue or a similar mechanism, accompanied by a clear mandate from ratepayers that they are willing to pay more rates for additional infrastructure.

Despite the need to maintain the proposed contribution caps, it is anticipated that local governments will request that these limits be increased. However, in addition to the reasons previously stated, it is also important to acknowledge that development provides local government with increased revenues through increases to the size of the 'rates base'.

Indeed, new home buyers and in particular, those buying early within a DCP area will effectively be paying for the new infrastructure twice, firstly through their direct DCP contribution and secondly through the rates collected prior to infrastructure delivery. Furthermore, development and increased densities also enable local government services to be delivered more efficiently through increased economies of scale. As such, it is vital that local governments provide their fair share of infrastructure funding contributions.

This section of the policy goes on to state that local governments are required to set infrastructure priorities following community consultation. However, in greenfield areas and other areas where there is significant population densification, the community that the infrastructure will serve are unlikely to be included in the consultation exercise. Furthermore, changing demographics, community desires and technological trends make forecasting longer term community infrastructure needs almost impossible. Therefore, it is important to retain the maximum 10 year, DCP lifespan.

In addition, it is important that community consultation does not result in a 'wish list' of infrastructure and includes the cost implications for both local government/ rates payers and DCP contributors so that consultation is suitably informed. To account for the emerging and future community, demographic analysis and a community needs assessment should be directly considered as part of infrastructure need. This analysis should also be made available as part of the community consultation process.

#### Recommendation

- The draft policy retains the proposed maximum per dwelling infrastructure contribution levies and maximum 10-year DCP timeframe.
- Further guidance is provided to clarify community consultation requirements.

### **6.7 Imposition of infrastructure contributions**

The policy should provide clear provision for securing costs without imposing holding costs of the developer, or impacting on peak debt of a development, both of these significantly impact on housing affordability. To that end, a mechanism such as a caveat on title could provide local government with certainty and security, without requiring a cash contribution well in advance of subdivision or development of the land.

We have seen, in cases where landownership is fragmented, a reluctance by local authorities to rely on Standard Contributions to ensure the construction of local roads that may involve multiple parent lots owned by multiple landowners. While there are some cases where such an approach is justifiable and understandable, this is often not the case.

In many cases landowners may be willing to fund the development of neighbourhood connecting roads if there is an economic case for doing so on the understanding that they will be able to reclaim 50% of the costs from a neighbouring landowner via section 159 of the Planning and Development Act (2005).

The default position of including all neighbourhood connector roads in a DCP, when combined with high cost estimates and indexation rates that we have seen when calculating DCP charges is a significant contributor to the high level of DCP charges.

The inclusion of Neighbourhood Connector and other local roads should only be included in a DCP as a last resort. The preferred source of funding should be the Standard Contribution mechanism. Neighbourhood Connectors should only be included, if after extensive landowner consultation, a view is formed that there is no other way of facilitating the construction of these roads.

Provision needs to be added to ensure that infrastructure contributions are not doubly charged at the different development stages of subdivision and development assessment.

#### **Recommendation**

- The policy sets out a general presumption against the inclusion of 'local roads' within DCPs.
- Clarity is provided that infrastructure contributions can only be collected at one stage of the development process.

#### **6.7.2.2 Timing of DCPs to align with comprehensive planning.**

UDIA, PCA and REIWA support the principle of requiring the preparation of DCPs concurrently with, or within 6 months of the adoption of a structure plan. However, examples have recently emerged of local governments attempting to introduce DCPs ahead of the structure plan adoption process. Whilst the proposal may resolve this, it is likely to lead to local governments holding up the structure plan adoption process. Given the lack of certainty regarding development form and outcomes, this adds further and unnecessary complexity to schemes.

Further, whilst understanding the intent, it is also important to recognise that the structure plan area may only form a small part of the DCP catchment area. Such proposals should be prejudiced and delayed by the absence of DCP, despite there being a range of other mechanisms available to local

governments to capture infrastructure funding. We recommend a re-framing of this provision to clarify that a DCP is not a statutory prerequisite to a Structure Plan and that a Structure Plan can progress without a DCP; however, it is beneficial to prepare a DCP alongside a structure plan where it is necessary to address the timely provision of infrastructure.

The draft policy also needs to clarify and provide guidance relating to local governments' attempts to secure interim contributions via local planning policies prior to a DCP becoming operational. Whilst recognising that there needs to be some ability for local governments to be able to secure contributions where a DCP is seriously entertained but not operational, we recommend that the Policy include greater guidance as to how this may be done. Typically, a developer would enter into a legal agreement with the local government to pay a contribution upon gazettal of the DCP. However, the use of caveats over the land to secure the payment is often problematic for developers with respect to financing and titling of lots and should not be the default security. The alternative is the payment of an interim contribution prior to gazettal, which is also problematic given the uncertainty associated with draft DCPs, and the local government tendency to add significant contingencies.

Similarly, the draft policy should make it clear that local government cannot withhold support for rezonings, structure planning, subdivision or development applications on the basis that a Developer Agreement is not in place.

We recommend that the Policy clarify that development contributions and interim payments cannot be collected prior to the gazettal of the DCP, and that local planning policies can not be used as a mechanism to secure contributions. Guidance is also needed to clarify the status of draft DCPs.

#### Recommendation

- The policy clarifies the timing of DCPs and the alignment with the adoption of structure plans.
- The policy clarifies the status of draft DCPs and confirms that local planning policies cannot be used as a mechanism to secure contributions.

#### **6.7.2.3 Requirements of a DCP**

The requirements of a DCP are supported, and in particular ensuring the need and nexus principle is maintained. However, a trend has emerged amongst some local governments of using inflated and unrealistic lot production estimates to artificially justify the inclusion of additional infrastructure items. This practice will also undermine the policy's commitment to establishing a 10-year time horizon to ensure that infrastructure is provided that serves the needs of the community. To address this, lot production estimates should be included in the annual review in close consultation with landowners to allow the DCP to be modified accordingly.

#### Recommendation

- Lot production estimates should be included in the annual review.
- The provision of infrastructure items identified by the DCP are modified in accordance with lot production estimates of the annual review.

#### **6.7.2.11 Cost contributions based on estimates**

The draft policy notes that owners can object to cost contributions by providing “*supporting evidence prepared by a suitably qualified person detailing the basis of the objection and include proposed alternative costs for consideration*”. However, the policy or guidelines do not define suitably qualified person/expert. Whilst section 3.3.8 of the guidelines refers to “*cost estimates for infrastructure should be undertaken by a quantity surveyor or construction cost consultant or other suitably qualified expert*”, greater clarity and a definition should be provided.

Whilst recognising the intent to ensure that the review process does not unduly delay the implementation of DCPs, for more complex schemes in particular, the practice of commissioning and receiving detailed engineering, traffic, valuation or other specialised reports proposing alternative costs will likely take in excess of 28 days. We suggest that this should be extended to 42 days.

To retain transparency, any dispute in costs should be assessed by an independent party, such as the panel or ombudsman mentioned above, not assessed by local government.

#### Recommendation

- A more practicable and efficient dispute process is established and the limit for providing supporting evidence extended to 42 days.
- Stakeholder consultation/engagement process is included in the annual review and independent audit.

#### **6.7.2.14 Indexation**

We note and support the proposal to standardise indexing. This is a superior approach compared to what is often current practice, which is apply a standard forecast annual cost increase such as 4 or 5% for 10 years. This methodology can have a significant impact on projected future costs.

Some indices, if they are nationally based ones, such Australian Bureau of Statistics (ABS) Producer Price Index for Non-Residential Building Construction may not reflect local market conditions. If there are high levels of construction activity, and consequent cost pressures, in the eastern states this may distort the projections in a Western Australian DCP.

A best, albeit more intensive, approach is to annually update the costs of key inputs such as land and infrastructure.

#### Recommendation

- Annual costs reviews should recalculate infrastructure and land value costs wherever possible.
- If this is not possible use a Western Australian based construction cost index

#### **6.9 Transitional arrangements**

The updated version of SPP3.6 has been prepared following widespread concerns that the existing policy has resulted in highly unsatisfactory DCPs both in formulation and implementation.

We are concerned therefore to note the draft policy states *“DCPs that have been prepared prior to the gazettal of this policy and are considered a seriously entertained proposal having been submitted to the WAPC for approval, are deemed to be DCPs prepared under the 2009 version of SPP3.6.”*

It is reasonably expected that it will take at least 12 months from now for an updated version of SPP3.6 to be gazetted.

Our concern is that currently drafted and advertised DCPs, which are not yet approved and do not conform with the intent of the updated version of the policy, will be adopted and be very difficult to amend in the future.

In at least one case a DCP currently being advertised is proposing a contribution rate estimated to be in excess of \$80,000 per lot, a clearly unsustainable charge.

Given the updated version of SPP3.6 is now being advertised, and is therefore in itself a seriously entertained document, we suggest a much better approach is to assess proposed DCPs against the new policy, as this will likely result in a better more modern DCP that is more fit for purpose.

It is acknowledged this may require some rework by the local authorities who have prepared and advertised DCPs not yet approved, but in the long run will be a superior approach, as it will mean the DCPs will be more equitable and more likely to receive landowner support when they commence.

Having a modern and supported DCP at the start of the development of an area is much more preferable than trying to retrofit a substandard DCP to the new policy at a future date.

Additionally, the three-year time-span to include an anticipated end date for DCPs without an end date is very generous and should be reduced to two years. This is not unreasonable given that these DCPs are required to comply with the annual reporting and monitoring requirements of the SPP. Furthermore, it is concerning that the policy is silent on the length of the anticipated lifespan of these DCPs. UDIA, PCA and REIWA are concerned that there are significant number of DCPs without an end date and it is imperative that the operation of all DCPs aligns expediently.

To enable those DCPs without an end date to be consistent with the objectives of the draft policy, the policy should state that there is an expectation that the lifespan of these DCPs will not exceed 10 years from the date of the scheme amendment, unless it can be appropriately demonstrated. Any infrastructure anticipated to be delivered beyond the 10-year time horizon should be removed from the DCP unless appropriate justification can be provided. However, it would be prudent to link longer term commitments and infrastructure directly to local government strategic planning.

#### Recommendation

- Unapproved DCPs be assessed for conformance with the updated draft version of SPP3.6.
- The timeframe for aligning DCPs without an end date is reduced to 2 years.
- The policy encourages all existing DCPs to be finalised within 10 years.

## Draft State Planning Policy 3.6 Infrastructure Contributions Guidelines

### 3.3 Preparation of a Development Contribution Plan

#### 3.3.1 General considerations

The general considerations that local governments are required to consider, differ and are not fully aligned with the SPP's principles set out in Section 6: Policy Measures. In particular, it is vital the principle that DCPs are accountable is included in the DCP preparation considerations.

The consideration concerning the 'Timing of Infrastructure' includes the statement that "*alternative funding contingencies should be considered*", it is not clear how this will be achieved or reasonably demonstrated. Similarly, whilst section 3.3.7 also reiterates the need to ensure all funding options are considered, it is not clear how this will be documented, or what evidence local governments are required to provide to demonstrate this.

In practice, DCPs have been (and will continue to be) the path of least political resistance in funding community infrastructure, providing minimal incentive for local governments to explore funding through conventional means (especially if it will result in increase in rates). This should be acknowledged and the "consideration" of "alternative funding" should therefore be rigorously scrutinised by the WAPC. Local governments should be required to list possible alternative funding sources that have been considered and provide reasons whether these funding sources are being or will be pursued or not.

#### Recommendation

- The guidelines fully align with the provisions of the policy.
- Guidance is provided confirming and clarifying how local governments will demonstrate that alternative funding options have been considered.

#### ***Process for preparing development contribution plans***

Industry is concerned that the process for preparing DCPs sets out that infrastructure needs should be identified before determining the catchment area for infrastructure contributions. In order to fulfil the need and nexus requirements, the catchment area or service area that the development sits within should be identified in parallel to infrastructure requirements.

#### Recommendation

- The process for preparing DCPs is clarified, including the defining of infrastructure catchment areas and public consultation elements/requirements.

#### 3.3.8 Estimating infrastructure costs

This section states that local government should not profit from a DCP, "*any excess funds should either be returned to the contributing owners within the DCA at the close of the DCF, or should be expended on the provision of additional facilities or improvements in that DCA*". The latter part of this sentence fails the needs and nexus principle and any excess funds should only be spent on the provision of additional infrastructure with the consent of those contributing funds.

Further, this contradicts Section 3.5: *Administration and operation of a DCP - Closing a Development Contribution Fund Account* which states that excess funds are to be returned to DCP contributors. For consistency, UDIA, PCA and REIWA recommend for Section 3.3.8 that the guidance statement be amended to state that any excess funds can only be spent on additional infrastructure with the consent of DCP contributors.

We note also the recommended contingency percentages being:

- Community and recreation construction items – 15 per cent of the estimated project cost
- Construction of roads or road intersections – 15 per cent of the estimated project cost
- Construction of bridges – 20 per cent of the estimated project cost.

These contingency percentages appear high and overly conservative and may equate to millions of dollars if the DCP is collecting, for example, more than \$20 million dollars in construction funding, as many do. We suggest a figure in the range of 10% is more appropriate and in line with common industry practice.

Generally speaking, the cost uncertainty should reduce as designs progress and known information about a project increases. As this process proceeds the contingency should so reduce.

We have also seen negotiated Developer Agreements include a contingency factor on an anticipated DCP levy in lieu of a finalised DCP being in place. This is effectively a contingency on a contingency and increases costs considerably. This practice should be discouraged.

#### Recommendation

- Section 3.3.8 is amended to that any excess funds can only be spent on additional infrastructure with the consent of DCP contributors.
- Recommended contingency allowances be set at 10% of anticipated costs
- Contingency allowance be reviewed as detailed design progresses.

#### ***Demand proportions***

We strongly support the principle that infrastructure with excess capacity designed to service future demand are not included in the calculation of infrastructure costs. This principle should be included in the Cost Apportionment Schedule Template.

#### Recommendation

- Cost Apportionment Schedule Template includes the identification of any excess capacity in infrastructure provision.

#### **4: Summary**

This section opens by stating that *“the key principle in the application of infrastructure contributions is that the beneficiary pays”*. However, this is not identified as one of the key principles underlying infrastructure contributions by the draft SPP’s policy measures. Rather the policy includes the principle of ‘need and nexus’, among others. The guidelines should be consistent with the policy.



#### Recommendation

- The Policy and its guidelines remain consistent.

#### ***Appendix B Cost Apportionment Schedule Template***

The template provided lacks any detail to understand how these templates will be prepared in practice. They also lack a number of key details including the need and nexus, how actual costs compare to forecasts (and cost escalations), local government capital commitments and other sources of finance, and administration costs. As well as the inclusion of these details, an example Cost Apportionment Schedule Template would also assist.

#### Recommendation

- An example Cost Apportionment Schedule Template



**Summary**

UDIA, PCA and REIWA wish to reiterate our support for the draft policy, however it is imperative that mechanisms to safeguard compliance with the policy are provided. In order to ensure that the policy objectives are achieved, it is vital that the policy clearly articulates the need for and mechanisms to ensure that local governments provide infrastructure contributions representative of the existing community.

We respectfully encourage the WAPC to establish a sub-committee to specifically oversee the operation of local government DCPs and consider the establishment of a central funding pool to enable the finalisation of schemes close to completion.

Whilst recognising that the revised draft Policy is considered to be 'seriously entertained', the previous draft SPP3.6 remained as a draft Policy since its release over 3 years ago. Therefore, to provide certainty and consistency, we encourage the WAPC to carefully consider our feedback and having addressed these issues, adopt the policy, without any undue delay.

Should any assistance or further information be required regarding this matter, UDIA would be delighted to assist. Should any further information be required in relation to the comments above, please contact Chris Green, Director of Policy and Research at [policy@udiawa.com.au](mailto:policy@udiawa.com.au) or 08 9215 3400.

Yours sincerely

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