

09 July 2019

Mr Ian Duncan
Executive Manager, Infrastructure
Western Australian Local Government Association
PO Box 1544
WEST PERTH WA 6872

Via email: iduncan@walga.asn.au

Dear Mr Duncan

**RE: WALGA INFRASTRUCTURE – ASSET MANAGEMENT
INDUSTRY REVIEW OF AS-CONSTRUCTED DOCUMENTATION SPECIFICATIONS**

On behalf of the Urban Development Institute of Australia WA Division (UDIA WA) and in consultation with the broader urban development industry, there is concern that the as-constructed data being funded by Developers and provided to Local Government Authorities is presently being underutilised and produced to a degree of detail which generally exceeds a standard considered adequate for Local Government purposes.

There are presently 21 local governments within Western Australia that are recognised as A-Spec members, each with varying requirements for the provision of A-Spec documents. Notably, each Local Government Authority (LGA) typically requires provision of all or a combination of D-Spec, R-Spec and/or O-Spec for a typical stage of development.

In the current market, we are typically observing costs to Developers in the order of \$250 per lot across a nominal 50 lot subdivision for the production of D-Spec and R-Spec documents. Where subsoil drainage infrastructure is also installed, costs per lot typically increase to \$300 per lot. Direct costs to the Developer to produce A-Spec documents have generally mirrored the typical survey fees associated with managing the deposited plan and clearance process and providing final pegging of the development.

Comparatively, documentation and submission of Water Corporation sewer and water assets is typically in the order of \$150 per lot, which provides the data necessary for Water Corporation to generate a publicly accessible infrastructure network portal. The cost to the Developer to fund these as-constructed documents is significantly less due to the reduced scope of survey required relative to A-Spec minimum requirements. A-Spec documents are typically perceived to be onerous to produce and ultimately result in inflated consultant and survey costs borne by Developers within the urban development industry.

Furthermore, it is often the case that the LGA will not provide clearances nor release financial securities until the A-Spec documents are submitted. The Developer is generally seeking clearances from the relevant Authorities at practical completion of the works, however the Project Surveyor is typically unable to obtain the complete set of required data until the end of a construction contract. Due to the considerable resources and time required to satisfactorily obtain data and produce the A-spec documents, it can typically take several weeks to produce once all the data is obtained. The production of the A-spec documents therefore directly delays LGA clearances being awarded and can lead to secondary financial cost implications being borne by the Developer as a result.

It is of particular importance to acknowledge that the production of A-spec documents can only be undertaken following practical completion of all drainage and road works on site. The setting of drainage pit lids and installation of footpaths, asphalt wearing course, and street signage typically occur in the final weeks of a civil works contract and are all required to be completed prior to a complete set of data being obtained and D-Spec and R-Spec being subsequently produced. Although the majority of civil scope captured in D-Spec and R-Spec is completed by the civil contractor, traffic signage is required to be installed by Main Roads Western Australia (MRWA) and must be in place prior to the R-Spec being finalised.

Once MRWA approve a signage and line marking design plan, a quote for MRWA to attend site and complete the necessary installation is then subsequently paid by or on behalf of the Developer. Henceforth, the Developer has no visibility nor control over the scheduling of MRWA to complete the required signage installation. There is considerable risk to the Developer that delays in lodgement of the R-Spec, and hence Local Authority clearance of the works, can result as a direct consequence of extended timeframes from MRWA for the delivery of their scope and services.

Notwithstanding the added risk and cost implications to Developers, we recognise the value in obtaining accurate and consistent data, however would recommend that the degree of detail to which data is being documented and provided to each LGA be re-evaluated. It is proposed that a reduction in the detail provided be considered to ensure that excess expense is not being incurred by Developers to provide information that is surplus to LGA needs. Whilst it is acknowledged that the A-Spec documents contain a comprehensive suite of asset information for new assets, we also note that existing assets are typically devoid of a comparable level of information.

For the purposes of asset management and maintenance budgeting, it would be reasonably deduced that a complete set of comprehensive data across the entire infrastructure network would need to be available to each Local Government to inform financial modelling. Hence, we are also seeking clarity on how the A-spec documents are being actively utilised by Local Government at this present time for the purposes of asset management or otherwise. We propose that a demonstration of how the information is being commonly utilised within LGA organisations would assist to better define the LGA requirements and reach a suitable outcome which optimises the benefit to Local Government, the development industry and members of the community.



A-Spec have produced 'Already Constructed' standard specifications tailored to enable Authorities to fill potential gaps in their existing asset data, hence we strongly advocate for each LGA to engage in retrospective, comprehensive survey of existing assets to deliver A-Spec documents to complement the investment being provided by Developers for the provision of A-Spec for new assets. Alternatively, we would advocate for the degree of detail required in as-constructed documentation to be reviewed to ensure that superfluous data is not being delivered where it is not necessary for typical LGA applications or exceeding the requirements for the LGA to deliver asset maintenance budgets.

We note that there are some instances where the LGA will accept the submission of A-Spec documents with reduced scope on the basis that there is minimal additional value in receiving a more comprehensive documents in strict accordance with A-Spec specifications. A valid example is providing O-Spec documents which contain irrigation mainline and junction box locations, whilst not enforcing the requirement to document every lateral irrigation line and individual sprinkler asset. We are advocating for a similar rationalised approach to the more common D-Spec and R-Spec documents for assets constructed within new developments. It is proposed that a modified version of the relevant A-Spec specifications be considered which delivers significant as-constructed data whilst omitting details that are not considered significant to management and maintenance of the assets (i.e. exact number of step irons in each drainage pit).

As an alternative to A-Spec, there is also capacity for consultants to provide surveyors with digital design files to enable modification for as-constructed purposes. Submitted in a suitable digital format to the LGA, the digital as-constructed files would include the necessary data for future reference and/or incorporation into network mapping tools specific to each LGA.

Furthermore, numerous utility providers effectively collate as-constructed information and input data into a live network database which is then readily accessible by the public and industry professionals. Acknowledging that Developers are investing in the provision of high-quality data to the relevant LGA, the production of a readily accessible 'intramaps' portal or similar resource would be of benefit to the industry and general public to identify and coordinate with existing assets.

It is often the case that the LGA is unable to provide Developers or consultants with accurate data on existing LGA assets that were installed prior to the implementation of the A-Spec requirements. In the majority of instances, the Developer is required to engage a licenced surveyor to locate and provide information on the levels of existing LGA assets to enable detailed design of surrounding development to occur. Whilst we acknowledge that some LGAs do provide asset mapping resources, a consolidated approach to the production and maintenance of these online resources across all LGAs has potential to be of significant benefit to the broader development industry.



Ultimately, the additional cost to Developers resulting from the production of A-Spec documents are considered to be significant, and even more so during periods of deflated market conditions. UDIA WA are keen to engage with WALGA and LGA representatives to further discuss the requirements for as-constructed documentation and identify the true benefits of the A-Spec products which are being observed by Local Government. It is proposed that the current LGA requirements for A-spec documents be revised to remove any superfluous scope and subsequently minimise the direct expenses and financial risk to Developers within the industry. We foresee an opportunity to optimise the outcomes for both Developers within the urban development industry and Local Government through further collaborative discussion and agreed action.

Should WALGA require any assistance or further information regarding this matter, the UDIA would be delighted to assist. Should any further information be required in relation to the comments above, please contact Chris Green, Director Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck', written over a light grey rectangular background.

Tanya Steinbeck

Chief Executive Officer