



Submission to Infrastructure Victoria's Draft 30 Year Infrastructure Strategy

March 2021

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ABOUT UDIA VICTORIA

The Urban Development Industry of Australia, Victoria Division (UDIA Victoria) is a non-profit advocacy, research and educational organisation supported by a membership of land use and property development organisations, across the private sector and Victoria’s public service. We are committed to working with both industry and Government to deliver housing, infrastructure, and liveable communities for all Victorians.

INTRODUCTION

UDIA Victoria would like to thank Infrastructure Victoria for the opportunity to make this submission on the Draft 30-Year Infrastructure Strategy. With UDIA's members deeply engaged with the planning and delivery of residential and commercial development across urban infill and greenfield release areas the Draft 30-Year Strategy posits a range of recommendations relevant to our sector.

UDIA commends Infrastructure Victoria's thorough data analysis and key issue synthesis across many dimensions in the compilation of the Strategy's 95 recommendations set across 15 thematic issue areas. We note the high rate of Victorian Government acceptance and implementation of recommendations from the inaugural (2016) 30-Year Infrastructure Strategy. This successful backdrop bodes well for the 2021 Strategy to also attain strong traction with government.

We would also like to highlight the robust consultation process that was undertaken by Infrastructure Victoria through the exhibition period, including high quality briefings and well-run on-line workshops.

This UDIA submission focusses on providing feedback and commentary on selected Draft Strategy Recommendations which have the greatest relevance to the property development sector.

UDIA looks forward to further engagement with Infrastructure Victoria through the coming months as the Draft Strategy is finalised ahead of being submitted to the Victorian government for consideration.

OVERARCHING STRATEGY FEEDBACK

The following points set out UDIA's broad feedback and key positions on the Draft 30-Year Strategy.

1. UDIA Victoria is broadly supportive of the Draft Strategy's thematic organisation, core objectives and the majority of the recommendations.
2. The Strategy correctly notes that infrastructure needs and context can evolve quickly, and as such infrastructure plans must be reviewed and updated regularly – as this latest Draft Strategy achieves as a five year update from the inaugural 2016 Strategy.
3. The Draft Strategy is appropriately positioned with a long-term view of Victoria's infrastructure needs over the next 30 years, with a laudable aspiration to balance infrastructure provisioning that meet both the immediate needs of the community and those in the distant future.
4. We commend Infrastructure Victoria for modelling multiple future scenarios for population growth, infrastructure investment and population distribution – particularly in this current period of flux and uncertainty.
5. UDIA Victoria submits that there is not sufficient recognition made of the critical economic and social role the development sector can and will play in the High Priority Actions. There is too much emphasis placed on government provided delivery, over and above private sector delivery.

6. UDIA strongly supports the early identification & reservation of land and corridors for future infrastructure including rail/metro, freight hubs etc.
7. We also provide unwavering support for the Strategy's call to better integrate land use and infrastructure planning, along with the critically important need for governments to be transparent and publish plans which commit them to infrastructure projects. (Ref: Recommendation # 32)
8. UDIA is leading the industry dialogue with the Infrastructure Contributions Advisory Committee, including the provision of detailed advice on pathways for improvements and reform to the infrastructure and development contributions system. To this end we applaud the Draft Strategy's focus and call out for infrastructure funding and infrastructure contributions reform. (Ref: Recommendation # 4)
9. UDIA supports the empowering of the Victorian Planning Association VPA to help better coordinate infrastructure planning and delivery across growth areas. Consideration should also be given to expanding VPAs remit to the established urban areas. (Ref: Recommendation # 35)
10. The Draft Strategy should include a recommendation to significantly expand the mandate and role of the Urban Development Program (UDP) currently prepared by DELWP. A fully operational and integrated UDP would be able to harness as 'one source of truth' for government and industry to optimise the planning, funding, sequencing and roll-out of growth supporting infrastructure provision. (Ref: Recommendation # 68)
11. It is laudable the Draft Strategy includes a regional Victorian focus, however more emphasis needs to be placed on equitable investment into the regions to support growth and build resilience. (Ref: Recommendation # 77)

UDIA VICTORIA FEEDBACK ON DRAFT STRATEGY RECOMMENDATIONS

RECOMMENDATION #4: REQUIRE 7-STAR ENERGY-RATED NEW HOMES IN 2022, INCREASING TOWARDS 8 STARS BY 2025

UDIA Feedback:

UDIA is supportive of the drive to minimise energy demand in the residential sector through advancing smart design & technologies in new build residential dwellings, with energy efficiency standards acknowledged as an important aspect of 'raising the bar'.

While the recommendation states that "achieving a 7.0 star NatHERS rating does not add significantly to the cost of residential construction" UDIA member feedback has indicated that the transition from 6 star to 7 star adds ~\$10k per house, and then adds a further ~\$15k in the transition from 7 star to 8 star.

Adding circa \$25,000 to the cost base is a significant feasibility challenge, which ultimately will be absorbed into the end house price. This impact on affordability will therefore require a prudent approach to setting the timelines for step-change implementation.

The star rating framework provides an assessment of the energy efficiency of the built fabric of new dwellings, but does not assess the devices which are added post-construction to compliment the building to deliver energy efficiency outcomes. Solar panels, smart meters and home automation systems are examples of installations and device addition that deliver positive energy capture and efficiency outcomes, but are not included in the NatHERS star rating framework.

UDIA supports the development of a broader whole-of-house energy rating typology which accounts for all the components that comprise the development and on-going running of a new residential dwelling.

In the first instance, and while a new holistic energy rating typology system is being developed, UDIA does support the transition to the 7.0 Star NatHERS rating, provided a suitable implementation period of two years (January 2023) is provided. This transition period is necessary to re-set the cost base of projects and implement modified build designs.

RECOMMENDATION #5 MANDATE A HOME ENERGY RATING DISCLOSURE SCHEME

UDIA Feedback:

UDIA Victoria is not supportive of a mandatory home energy rating disclosure scheme being introduced to the established housing market. Retro-fitting older residential dwellings for energy efficiency is typically far more expensive than implementing energy efficiency initiatives from the outset in new-build construction.

The impetuous to improve energy efficiency in existing dwellings should lie with the property owners through incentivisation to realise cheaper home running costs, and providing a selling-point of difference. This 'carrot' approach is preferred to a blanket mandate which would unfairly disadvantage second-hand stock developed in previous eras. One likely outcome of

a mandatory rating disclosure scheme is a pass-forward of impost costs from retrofitting to rental and sale prices, thereby impacting negatively on housing affordability.

The development industry is happy with the mandatory disclosure scheme for newly constructed dwellings, and would be agreeable to a voluntary energy efficiency scorecard also being applied to the broader established market, provided the scorecard is simple and straight forward to undertake.

UDIA would be happy to provide an outline of a potential scorecard in a post-submission exchange with Infrastructure Victoria.

RECOMMENDATION #8 ALLOW NEW GAS-FREE HOUSING ESTATES AND REVIEW CURRENT GAS POLICIES

UDIA Feedback:

UDIA provides broad support to the intent of this recommendation to help drive innovation in the property market and support the transition to zero emissions by 2050.

We also support the call for a public review for the future of natural gas in Victoria, which should include a Statewide consumer survey to understand what the public think about gas free home homes. UDIA members report that certain home purchasers currently prefer gas cooktops to electric, but this maybe a relatively small cohort who may be able to be serviced by gas bottles at the home. There are potential issues around transition and the need to consider competitive neutrality with developers in one area potentially being able to offer gas whereas other growth fronts may not be able to compete on even terms.

There is likely to be a need for legislative change to enact this recommendation, and while an important arena we do not consider this is not the highest priority recommendation in the Draft Strategy.

RECOMMENDATION #27: CONSTRUCT AN OUTER METROPOLITAN ROAD AND RAIL CORRIDOR

UDIA provides unanimous support for the bring-forward of the outer metropolitan road and rail corridor which will support economic and jobs growth in the outer north and west by helping link current and future industrial and logistics precincts with international transport terminals.

The Draft Strategy correctly states that Melbourne's outer western and northern suburbs have an underdeveloped road network, as compared to the well-developed road network in the city's established areas.

This outer metro ring road would help address inequity in metropolitan region's transport infrastructure provision, while facilitating fast movement of people and freight and supporting efficiency in supply chains and linking up residential and employment growth areas.

UDIA supports the development of a clear plan outlining the staged development of this corridor – which will help support industry development and job creation across this fast growing part of Melbourne.

This city shaping project will have a significant role in the structuring and sequencing of future urban growth across the Western and Northern Regions, and will create better connections to key international transport hubs including Melbourne Airport, Avalon Airport and the Port of Geelong.

RECOMMENDATION #32 PRODUCE PUBLIC PLANS FOR PRIORITY INFRASTRUCTURE SECTORS

UDIA Comment:

UDIA provides unequivocal support for greater collaboration and transparency of public sector agency plans for future service delivery. The lack of government agency coordination and cohesion around forward strategic planning is driving sub-optimal industry and community outcomes. This includes timing misalignments and major delays for provision of growth supporting infrastructure (including transport, health, education and civic facilities), services (including rail, tram and bus) as well as for growth enabling infrastructure (including water and sewer, electricity and gas).

Over recent decades there has been a culture of Victorian government agencies reluctance to publish plans which commit them to infrastructure projects. The absence of clearly understood sectoral plans to service future growth, has made the planning and coordination of land use change and infrastructure provision challenging at oftentimes haphazard.

In order to improve the collaboration and integration of forward growth planning UDIA calls upon Infrastructure Victoria to recommend to government a re-birth/rescoping of the Urban Development Program (UDP) which is prepared annually by DELWP. A fully integrated and industry engaged UDP would provide a centralised and detailed 'one-source-of-truth' of the pipeline of short and medium term residential, commercial and industrial floorspace generating development across Greater Melbourne and Greater Geelong.

The UDP should form a base layer of intelligence for the growth planning undertaken across sectoral agencies, with the UDP also providing a feedback loop to spatially highlight the forward expectations for the location of new schools, health facilities and key community facilities.

RECOMMENDATION #33 PUBLISH VICTORIA'S TRANSPORT PLAN

UDIA Comment:

In addition to providing greater transparency of infrastructure planning and delivering greater guidance on desired growth patterns and sequencing, the publishing of sectoral plans, particularly a Long Term Transport Plan, would help move away from new project

announcements “landing out of thin air.” The suburban rail loop announcement is a case exemplar of a major city-shaping transport project which was announced, virtually from left-field, as policy by the incumbent Andrew’s government during the 2018 Victorian State election campaign period, and took many in industry off-guard.

In 2018 the NSW government released the Long Term Transport Plan, the Greater Sydney Region Plan and x6 District Plans, and the State Infrastructure Strategy at the same time – with the ambition to integrate land use, transport and infrastructure planning between the three tiers of government and across State agencies. By way of contrast *Plan Melbourne* was developed without a corresponding transport plan, which hampers the ability and effectiveness of the strategic land use plan to coordinate and inform urban growth and redevelopment outcomes.

This NSW government achievement provides a fruitful model for Victoria to follow, with the transport initiatives presented in the Greater Sydney Region Plan sourced from the Long Term Transport Plan organised into four categories: committed, investigation 0-10 years, investigation 10-20 years and visionary 20+ years. The later three categories require further investigation and ultimately decisions of government on commitments to funding.

Providing this level of land use and transport planning integration and transparency will allow the Victorian development industry to more confidently make investments that align with and bolster government plans.

In summary, UDIA provides unequivocal support to the Draft Strategy recommendation to publish a Long Term Transport Plan and in doing so help drive more integrated land use and infrastructure planning.

RECOMMENDATION #34 REVIEW VICTORIA’S INFRASTRUCTURE CONTRIBUTION SYSTEM TO COVER GAPS

UDIA Comment:

The announcement in mid-December of the formation of the Infrastructure Contributions Advisory Committee chaired by Jude Munroe AO, shortly after the release of the Draft 30-Year Infrastructure Strategy, was warmly welcomed by UDIA. After many years of sustained research and advocacy for reform and improvements to the infrastructure and development contributions systems, UDIA is now highly energised and engaged with the Advisory Committee helping provide a range of industry evidence and insights to help inform reform recommendations.

UDIA therefore strongly supports the Draft Strategy’s call for significant reform to the infrastructure contributions system in terms of both the scope of its application to new development and governance structures.

UDIA Victoria provides unwavering support for the proposed reform measures suggested by Infrastructure Victoria and recommends the following:

1. That, in principle, a revised contribution system should result in more consistent, efficient levies that are applied to areas of significant housing growth or new

commercial development across established suburbs, growth areas, peri-urban areas, and regional cities.

2. That the system could impose a lower charge on sites building extra dwellings or commercial floorspace outside of designated precincts.
3. That any revised scheme should be able to be readily implemented, have strong monitoring, oversight and evaluation mechanisms, including set review timeframes.
4. That the Victorian Government should empower a Responsible Agency (such as the Victorian Planning Authority) to monitor infrastructure delivery in greenfield growth areas and priority urban renewal precincts.
5. That the Responsible Agency should initially monitor and report to the Victorian Government on delivery of infrastructure proposed in precinct plans, to identify infrastructure gaps for communities, which could be extended to identifying sequencing of investment and appropriate funding amounts.
6. That the New South Wales' Place-based Infrastructure Compacts be used as a model for the new governance arrangement, especially the 'program business cases' approach to delivering coordinated infrastructure.

UDIA has long prosecuted that Victoria's infrastructure contribution system is too opaque and lacks consistency and transparency, and does not consistently deliver local infrastructure to support new development in a timely manner.

In order to support our advocacy and engagement with the reform program, UDIA has commissioned an independent expert to undertake a significant research project which investigates, analyses and quantifies costs of infrastructure contributions on the development industry.

The research investigation and analysis of levies within a sample groups of DCPs and ICPs released over the last decade have highlighted the following key points:

- The Transport levy has increased significantly over time and continues to increase despite the introduction of standard levy caps through the ICP system.
- There has been no further growth in the Community and Recreation levy since the introduction of the standard levy cap. This has been effective in managing escalation of costs.
- The average Public Land contributions rate (%) has been slightly decreasing over the assessment period.
- The ICP system has standardised Community and Recreation levy and equalised Public Land contributions.
- There has been a failure of the ICP system to contain or standardise transport construction costs and levies.
- Frequent use of the Supplementary Transport levy is enabling levies to continue escalating

These sorts of empirically grounded research insights are being folded into our on-going dialogue and system wide reform recommendations to the Advisory Committee.

UDIA Victoria would be happy to provide further detail to Infrastructure Victoria around our ongoing engagement and reform recommendations to the Infrastructure Contributions Advisory Committee.

RECOMMENDATION #35: SUPPORT MORE HOMES IN PRIORITY ESTABLISHED PLACES

UDIA Comment:

UDIA supports the building of more homes in well located areas, with good access to transport and jobs – which helps drive social, economic and environmental dividends. We also support review of planning settings to increase density in well located areas, overseen by design panel reviews.

The Draft Strategy makes the important point that only a quarter of new homes are currently built in activity centres – the precise locations with good access to jobs, services & public transport.

The Draft Strategy identifies that aside from rhetoric in *Plan Melbourne* that there is a lack of Victorian Government direction in official documents around local housing capacity and housing targets for established urban areas:

“no Victorian Government document clearly specifies the established suburbs where extra new homes might be built, or how many might be built there.”

Without clear strategic planning guidance, including outlook housing targets for local areas, the building of urban density across the established urban footprint often occurs in a haphazard fashion and oftentimes not in locations with optimal access and services.

UDIA recommends consideration of the manner in which the Greater Sydney Commission has developed a top down and bottom-up strategic planning methodology for preparing and achieving consensus on local council scale ten-year housing targets across a metro area.

The Greater Sydney Region Plan provides a macro metropolitan scale outlook for population, dwelling and employment growth over both a twenty and forty year horizon for Greater Sydney and each of the five Districts covering the metropolitan area. Targets at this scale are largely determined by official NSW government population and implied dwelling requirement projections.

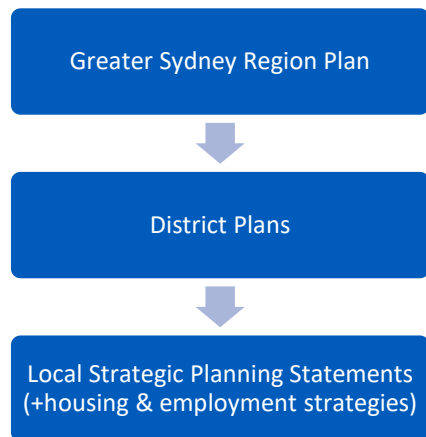
District Plans, covering multiple local government areas provide the next scale down of housing target setting with the intent for the District itself to determine the most likely/desired distribution of future housing growth across each local government area. The deliberative process undertaken between Councils to determine intra-District and local level housing targets, is ideally underpinned by local housing strategies and housing capacity studies which provide a suitable evidence base to support target settings.

The final layer in the current arrangements for managing and directing Sydney's growth are Local Strategic Planning Statements (LSPS) which further crystallise the future growth framework at a local scale. Each Council's LSPS sets out the twenty-year vision (to align with the District and Metro Plans) for land-use in the local areas, the special character and values that are to be preserved and how

change will be managed into the future. The LSPS provides the finer grained definition around where more homes in prioritised established places are intended to happen, giving industry and the community a clear line of site on new growth.

While the Sydney model isn't perfect it does provide a potential model for Victorian government consideration of developing, communicating and delivering on housing and employment targets in established urban areas.

Sydney's Planning Hierarchy¹



UDIA contends that the Victorian Planning Authority (VPA) could be suitably well placed to play a key coordinating/oversight role in a re-structuring of metropolitan and sub-regional scale planning across Greater Melbourne and the regional Victoria.

RECOMMENDATION #36: DELIVER VERY LOW INCOME HOUSING WITH INCLUSIONARY ZONING

UDIA Comment:

UDIA Victoria is supportive of the expansion of affordable housing across Victoria – many more affordable homes of different types are required for people on very low incomes.

However, UDIA is opposed to the universal application of inclusionary rezoning to deliver low-income housing, as this can make some projects unfeasible, leading to deferrals and project abandonments.

The current housing affordability crisis cannot be solved through Victoria's planning system alone, or by having various arrangements in place at the Council level. The solution requires a whole of Government approach underpinned by significant capital investment from the State Government.

¹ <https://www.greater.sydney/metropolis-of-three-cities/implementation/collaborative-approach-city-planning>

Affordable housing is social infrastructure that is a broader community issue; the solution to which should not be isolated to the private sector. Significant underinvestment by governments over time cannot be successfully remedied by leveraging the new housing markets in a way which will directly result in further price lift and reduced affordability.

The urban development industry is ready, willing and able to deliver affordable housing in partnership, but not at the expense of investment certainty and project feasibility. Further, the failure to adequately transition any new controls in recognition of market cycles, will result in a reduction in housing supply and, perversely, an increase in median house prices.

RECOMMENDATION #37: DEVELOP AN INTERCONNECTED OPEN SPACE NETWORK

UDIA Comment:

UDIA extends broad support for reform of the developer open space contribution scheme to bring greater transparency and equity. We roundly support the drive for Victorian Government to work closely with local councils to fund and explicitly target connectivity, and tree planting and delivery. The government also needs to work more closely with utility providers to address and remove barriers to achieve greener outcomes. Council's should be required to increase transparency of the capture and use of the open space funds they currently collect and how these funds have or are proposed to be expended.

RECOMMENDATION #68: PRIORITISE & OVERSEE INFRASTRUCTURE DELIVERY IN GROWING COMMUNITIES

UDIA Comment:

Empower a Responsible Agency

Infrastructure Victoria suggests significant reform to the infrastructure contributions system in terms of both the scope of its application to new development and governance structures. UDIA Victoria broadly supports the proposed reform measures suggested by Infrastructure Victoria and recommends the following:

1. That, in principle, a revised contribution system should result in more consistent, efficient levies that are applied to areas of significant housing growth or new commercial development across established suburbs, growth areas, peri-urban areas, and regional cities.
2. That the system could impose a lower charge on sites building extra dwellings or commercial floorspace outside of designated precincts.

3. That any revised scheme should be able to be readily implemented, have strong monitoring, oversight and evaluation mechanisms, including set review timeframes.
4. That the Victorian Government establish the following governance structures:
 - a. Empower a Responsible Agency (such as the Victorian Planning Authority supported by the Essential Services Commission) to coordinate, oversee and monitor infrastructure delivery in greenfield growth areas and priority urban renewal precincts.
 - b. That the Responsible Agency should initially monitor and report to the Victorian Government on delivery of infrastructure proposed in precinct plans, identify infrastructure gaps for communities, and that this could be extended to identifying sequencing of investment – for the purpose of supporting private sector investment - and appropriate funding amounts.
 - c. Establish a Sub-Committee of Cabinet to make decisions about integrated growth area plans and delivery and connect into the State Budget process.
 - d. Establish an Expert Panel to hear submissions about proposed variations to development standards set by Local Government and State Government Departments and Agencies that impact on the cost of delivering new dwellings
5. That the New South Wales' Place-based Infrastructure Compacts be used as a model for the new governance arrangement, especially the 'program business cases' approach to delivering coordinated infrastructure.

Expanded Urban Development Program

The proposed governance structures above would benefit from an expanded Urban Development Program (UDP). A UDP which provides a rolling quarterly update on the forward development aspirations of the development sector to deliver new dwellings and commercial and industrial floorspace across Greater Melbourne over the next five years and beyond, would provide a rich 'one source of truth' base layer of the forward growth plan.

The major divergence in the growth scenario projections for Melbourne's new growth areas, i.e. 235,000 extra people (low series) by 2036 up to 975,000 extra people (high series), reflects the inherent difficulties and challenges in the efficient provision of enabling infrastructure and growth coordination.

An expanded UDP, with a significant upgrade in the methodological approach to the current production approach of the UDP by DELWP, could deliver the desired accuracy and robustness to become a genuine growth servicing road-map requires.

We proposed the expanded UDP have a bespoke platform that integrates the provisioned and planned enabling infrastructure, particularly roads, water, sewer, and electricity, which can be used to scenario test different options for servicing the 'infrastructure frontier'. This scenario testing tool would provide valuable data to enable the Responsible Agency to make informed decisions whilst also supporting councils, planning authorities and most of all the service authorities to assist capital investment decision making and business case preparation.

UDIA's final comment on this recommendation in the Draft Strategy relates to the estimated \$23,000 of developer contributions per lot in Melbourne's greenfield areas. Recent research commissioned by UDIA Victoria shows the developer contributions (combined ICPs, Development Services Scheme, drainage, GAIC, and connections to sewer and water) in Melbourne's greenfield areas are currently averaging approximately \$52,000 per lot, more than double the estimate in the Draft Strategy. The lack of transparency on where the collected contributions are being spent, and when, is an on-going issue and concern, as raised under feedback for Recommendation #34.

RECOMMENDATION #69: EXPAND RAIL ACCESS IN OUTER SUBURBS

UDIA Comment:

UDIA strongly supports the expeditious expansion of the rail network to service growth areas, augmented by high frequency bus provision – as a short and medium term strategy.

Melbourne's outer suburbs are disadvantaged in terms of access to public transport services, which flows onto high levels of private motor vehicle usage, causing congestion and compromising access to jobs, education, services and social connections.

UDIA supports the call for the Victorian Government to increase passenger rail capacity in new growth areas and expand their access to the metropolitan rail network. We support the completion of the detailed feasibility study for capacity expansion to Wallan and a new public transport corridor connecting Wollert to the Mernda line, in addition to the other growth area servicing suggestions put forward in the Draft Strategy. Significant increases to rail infrastructure and capacity is urgently required to service the booming Wyndham corridor.

RECOMMENDATION #70: EXPAND & UPGRADE MELBOURNE'S OUTER SUBURBAN ROAD NETWORK

UDIA Comment:

Similar to the commentary provided for recommendation #69 in terms of heightening the accessibility and equity for outer metropolitan residents, UDIA strongly supports the implementation of a program of upgrades to the arterial road network, beyond what is currently funded, focussing on congested roads and corridors in outer metro and growth suburbs council areas. The Outer Suburban Arterial Roads (OSARs) Program is a sound model that could be more broadly deployed to develop major infrastructure at scale across growth areas and avoid ad hoc individual projects which don't keep pace with urban growth.

RECOMMENDATION #71: TARGET 30% TREE CANOPY COVERAGE IN NEW GROWTH AREAS

UDIA Comment:

While UDIA is supportive of reform to tree canopy provisions, it will be implementation which will remain the key challenge. Protracted negotiations with local councils on trees and canopy cover typically boil down to disputation of mandating trees on private space, versus provision on public land. The strategy to expand the urban canopy cover should also include strong incentivisation and grant funding – as is being pursued under the *Greener Our City* program in Sydney which is planning to plant 5 million trees by 2031.

UDIA members report that utility requirements often make achieving tree canopy targets challenging, and we submit that a more nuanced and locally appropriate canopy requirements should be considered, over a blanket 30% coverage target.

RECOMMENDATION #77: DELIVER FUNDING CERTAINTY FOR REGIONAL ROAD MAINTENANCE & UPGRADES

UDIA Comment:

Regional Victoria has a big infrastructure problems and transport deficits. The Government needs to invest much more into the regions and in a more strategic and transparent way. This relates not just to roads, rail, drainage and sewer – but a broader array of growth enabling and growth providing infrastructure. Often regional growth areas need key investments, for example in major drainage or key roads to help catalyse growth. A more targeted program on investment to unlock growth fronts would be welcome.

There is a strong need for the VPA to have a stronger role in the regions, in particular in Geelong but also in the other major growth hubs to bring a more strategic approach to planning and to help co-ordinate the arms of Government to facilitate major growth.

UDIA supports the Draft Strategy's call for a two year timeframe to specify clear levels of service for each type of regional road and bridge to provide a transparent framework – so every road is maintained in conditions suitable for its intended purpose. This should be followed by an on-going program to fund regional road and bridge maintenance and upgrades to meet these service levels.

UDIA also supports the direction that after specifying road service levels, funding should be allocated to priority maintenance and upgrades, determined by desired safety, vehicle emissions, productivity outcomes and existing road condition.

---END---



