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Submission: Please see attached. SWDD should be dissolved and return to WSC's only to spread the work out more evenly and make the construction costs more competitive for the smaller developers.

Billbergia has been a WSC in this industry for over 10 years and has established a solid developer client base seeking Section 73 certificates in that time. Since the introduction of SWDD we have experienced a significant drop in our turn over of Section 73 applications, and to some extent, Building Plan Approvals. We believe that the way SWDD is promoted by being in tap-In it has an unfair advantage over the WSC as 'one-off' developers get the impression that it would be easier to get SWDD do the Sec 73 than looking for a WSC. They would also be under the impression that the service would be cheaper and quicker (perhaps). Due to their presence on Tap-In the novice is more inclined to use SWDD and hence we have seen a 50% reduction in applications through our office.

We note that our regular clients, both professional and semi-professional developers, do not use SWDD direct because the construction costs are typically 3 to 5 times higher than the industry rates for the same services. We have received a number of projects that were started through SWDD as the developer found the construction costs to high and came to us so that they could use a private constructor to do the construction at more affordable prices. Also, they could pay the costs as they were incurred instead of a lump sum up front. With the mum and dad developers they don't know what to expect and then think that the price quoted by SWDD is high, but it is required to get a Sec 73.

SWDD have an advantage over the WSC as they do not attend site to verify the construction (if it meets the standards) or if it was built correctly. We hear numerous comments from SW inspectors that the selected SWDD constructors take short cuts and the work is very substandard. While the WSC is responsible for the certification and must spend time and money to verify work. This is a double standard.

The current SWDD system has several issues that are unfair to both the WSC and the developer.

- SWDD has taken a lot of projects away from the WSC's reducing their turnover
- SWDD don't inspect works by their selected constructors which leaves quality at risk
- Accredited Constructors want to do the SWDD work but can't as SWDD only has 5 selected contractors to do the construction
- The cost of construction to the developer is very high compared to the pre SWDD days if the developer uses SWDD
- The WSC must cover costs for inspections and administration that SWDD doesn't appear to be doing
- Less SWC staff working on mainstream Section 73 applications and slower turn around times since SWDD came into effect

In summary, there was no need to introduce SWDD as the veteran developer was complaining about transparency within Sydney Water and the time taken to release/develop large parcels of land, contrary to what SWDD is doing. SWDD only serves the small, one-off developer who doesn't realise that they are paying too much for the construction. SWDD has taken a significant workload out of the WSC market and is using its presence in Tap-In by being very easy to access thus creating an unfair exposure advantage. If we, as a single WSC, were to be listed on Tap-In as an option to provide the Sec 73, we would get hundreds of 'clicks' and referrals to do the work.

SWDD should be dissolved and more staff directed to doing the normal Sec 73 works.