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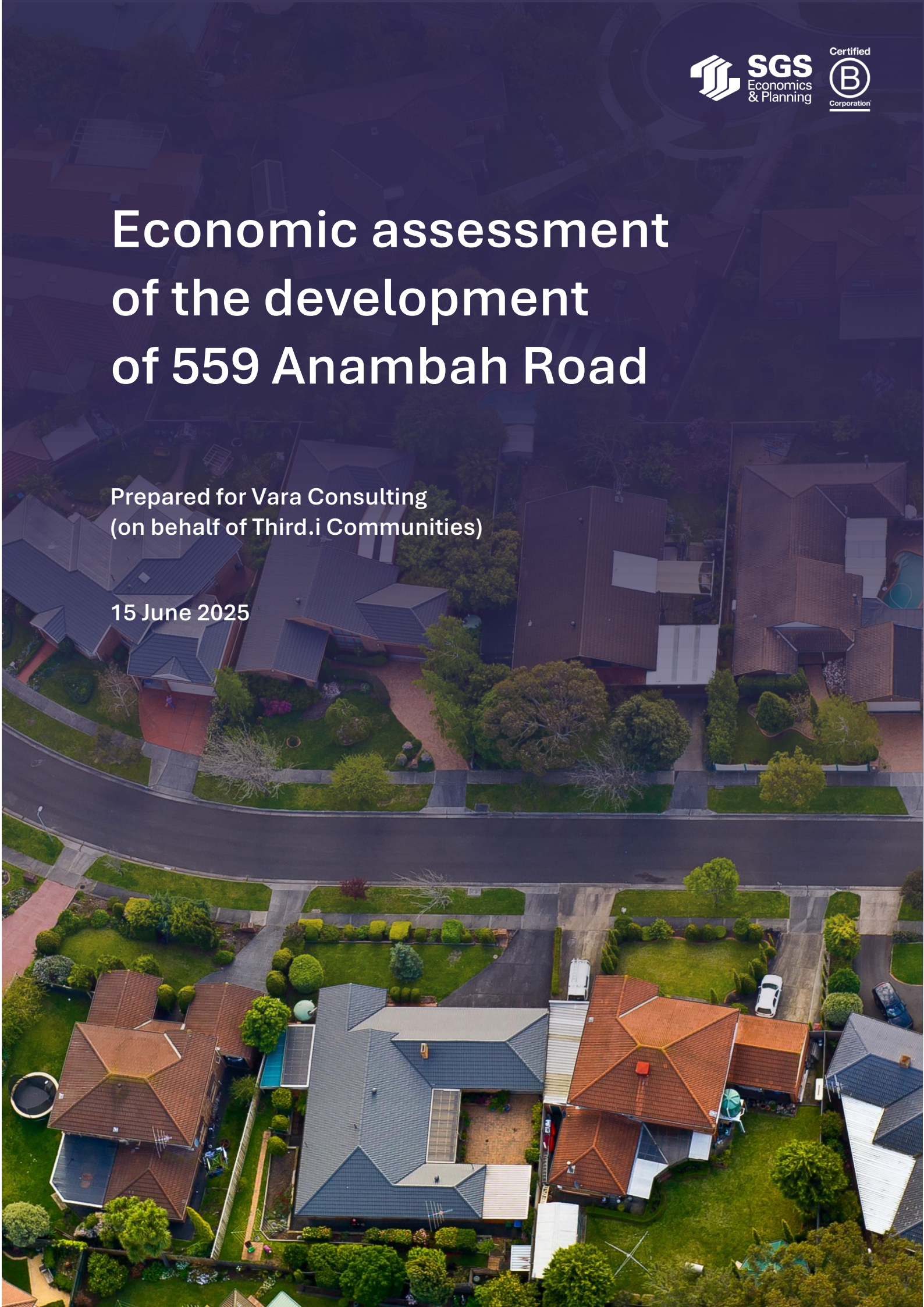
Economic assessment of the development of 559 Anambah Road

Prepared for Vara Consulting
(on behalf of Third.i Communities)

15 June 2025



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Executive summary

Overview

The Anambah Urban Release Area (AURA), located northwest of Maitland, is identified in the *Hunter Regional Plan 2041* (2022) as part of the 'Branxton to Anambah' regionally significant growth area. The AURA is 472 hectares in area and is comprised of land owned by multiple parties, with the majority share owned by the Roche Group. Third.i Communities controls approximately 124 hectares of land at the northern end of the AURA at 559 Anambah Road, of which approximately 65 hectares is within the AURA boundary and zoned R1 General Residential. Upon full build-out, the AURA is expected to deliver between 3,000 and 4,500 residential allotments, with the Third.i component comprising around 900 lots.

The HWC *Growth Plan* prepared for potable water and wastewater infrastructure identifies the AURA development front with initial connections to the HWC network expected within 0 to 5 years. This plan does not distinguish between landholdings within the AURA or provide guidance with respect to the internal servicing arrangement.

There is no formally adopted development sequencing plan for the AURA. In lieu of such, the sequencing for the area is being informed by the *Water Servicing Strategy* and *Wastewater Servicing Strategy* prepared in 2023 by ADW Johnson on behalf of the Roche Group. These strategies propose that development of the release area commences with land owned by Roche, followed by that of the other landowners. There has not been any consultation with other landowners during the preparation of the servicing strategies.

Third.i Communities is proposing to develop its land earlier than is contemplated in these servicing strategies and has undertaken additional infrastructure planning work, in consultation with relevant providers and authorities, to identify infrastructure solutions that permit the development of their land in a timelier manner, without having to rely on the prior development of Roche's land.

Council's response

Maitland City Council have considered the Third.i Communities proposal and in response have raised concerns that the development application is "premature, out-of-sequence, and lacking evidence that it can stand alone". Council has also raised concerns that the earlier development of land at 559 Anambah Road could impact Roche Group in its delivery resulting in higher infrastructure costs and negatively affect housing affordability in the AURA.

Preferred and alternative development sequencing.

The establishment of a preferred sequence for greenfield development enables infrastructure agencies to plan and coordinate their investments in a manner that minimises the overall net present value cost of extending infrastructure into new urban areas.

However, developing new urban land in an orderly manner need not necessarily be bound by the preferred sequencing if an alternative approach can be shown to yield a net community benefit (discussed below).

In fact, the imposition of a fixed development sequence can reduce housing choice and create monopolies, impacting the timing and rate of housing supply. Maintaining competitive dynamism in the greenfield housing market requires a more nuanced approach, ensuring cost-neutrality for public service authorities and appropriately allocating staging risk.

Assessing the net community benefit of an alternative development sequence

An alternative development sequence is likely to result in a net community benefit if two conditions can be satisfied, namely:

- The alternative sequence will result in a coherent community in the short term, and
- Any demonstrable increases in costs to public infrastructure agencies (local and state) are funded by the proponent.

This report tests the proposal to develop the land at 559 Anambah Road against these conditions, based on information available at the time of writing.

Summary of key findings

In relation to the requirement for a coherent community in the short term, it was found that given the progressive nature of growth area development, planned future infrastructure provision, and infrastructure available within a short drive (or public transport journey, if available), it is reasonable to conclude that the development of land at 559 Anambah Road will support a coherent community in the short term.

As is the case with any newly emerging greenfield area, the initial residents will need to access some amenities outside the site until the development progresses, and local demand for those amenities is established. This would be the case regardless of which part of the AURA develops first.

In relation to the matter of cost neutrality, based on information available, it appears unlikely that the development of 559 Anambah Road will result in demonstrable additional costs to public authorities (see table below). In the case that any such costs can be identified, Third.i have expressed a willingness to meet these costs.

Table 1: Cost neutrality assessment summary

Infrastructure category	Formally adopted infrastructure sequencing plan by public authority	Approved infrastructure strategy	Cost-neutrality to public authorities of development of 559 Anambah Road	Responsibility for meeting additional costs to public authorities, if any
Potable water	Yes	Yes	Highly likely*	Third.i, if the development at 559 Anambah Road results in demonstrably higher costs to public authorities.
Wastewater	Yes	Yes	Highly likely*	
Road network	No	No	Highly likely	
Electricity	No	No	Highly likely	
Stormwater	No	No	Highly likely	

Source: SGS Economics and Planning (2025)

*The question of cost neutrality will depend on the specific HWC funding arrangements and decisions regarding reimbursement for developer works. These are difficult to predict. On balance it is reasonable to assume that HWC would reimburse a fixed amount for developer provided infrastructure in the AURA, regardless of the specific sequence of development, unless this can be demonstrated otherwise.

Impacts of infrastructure costs and development sequencing on housing affordability

Concerns that an alternative development sequence will result in a higher infrastructure cost and impact housing affordability are misplaced. Commentary from property industry peak bodies and in daily media frequently suggests that infrastructure costs, taxes and charges are 'passed-forward' contributing *directly* to the price of housing. However, such claims are mistaken and directly contradict the orthodox and widely accepted understanding in economics of the relationship between costs and prices in housing development.

Developers are 'price-takers' meaning the price of houses or serviced lots is determined by the broader housing market which include both existing dwellings and new dwellings (or serviced lots) in other locations. House prices are not set on a 'cost-plus' basis, meaning their price is not the sum of the various input costs per dwelling.

Any increase in the cost of infrastructure incurred by a developer to realise their project will either be 'passed-back' to the land seller as a lower price for undeveloped land (i.e. a lower residual land value for the englobo site) or otherwise absorbed by the developer through a reduction in their margin for profit and risk.

A more material influence will be the extent to which there is genuine competition between landowners to provide serviced lots to the market.

Strict adherence to a development sequence which prevents competition could slow the rate of lot production, stymie quality and innovation and limit choice to the consumer. Assessing the appropriateness of the development of the Anambah Road site, warrants consideration of the broader question of whether limiting competition to achieve 'orderly development' is in the public interest.

1. Introduction

This section outlines the background and purpose of this report.

1.1 Context

The Anambah Urban Release Area (AURA), located northwest of Maitland, is identified in the Hunter Regional Plan 2041 (2022) as part of the 'Branxton to Anambah' regionally significant growth area. AURA is 472 hectares in area and is comprised of land owned by multiple parties, with most of the land (66%), generally in centre and southern part of the release area, owned by the Roche Group.

Third.i Communities controls approximately 124 hectares of land at 559 Anambah Road, of which approximately 65 hectares is within the AURA boundary and zoned R1 General Residential. Upon full build-out, the AURA is expected to deliver between 3,000 and 4,500 residential allotments, with the Third.i component comprising around 900 lots. Figure 1 shows the overall AURA boundaries including the area proposed for residential development by Third.i.

Maitland City Council is responsible for the preparation of the Development Control Plan (DCP) for the area, which is likely to include provisions regarding development staging. However, since the AURA was rezoned in 2020, a draft DCP has not been released and the likely timing for the DCP is unknown.

In lieu of a formally adopted development sequencing plan, staging of development within the AURA has been broadly established by the *Water Servicing Strategy* and *Wastewater Servicing Strategy* prepared in 2023 by ADW Johnson on behalf of the Roche Group.

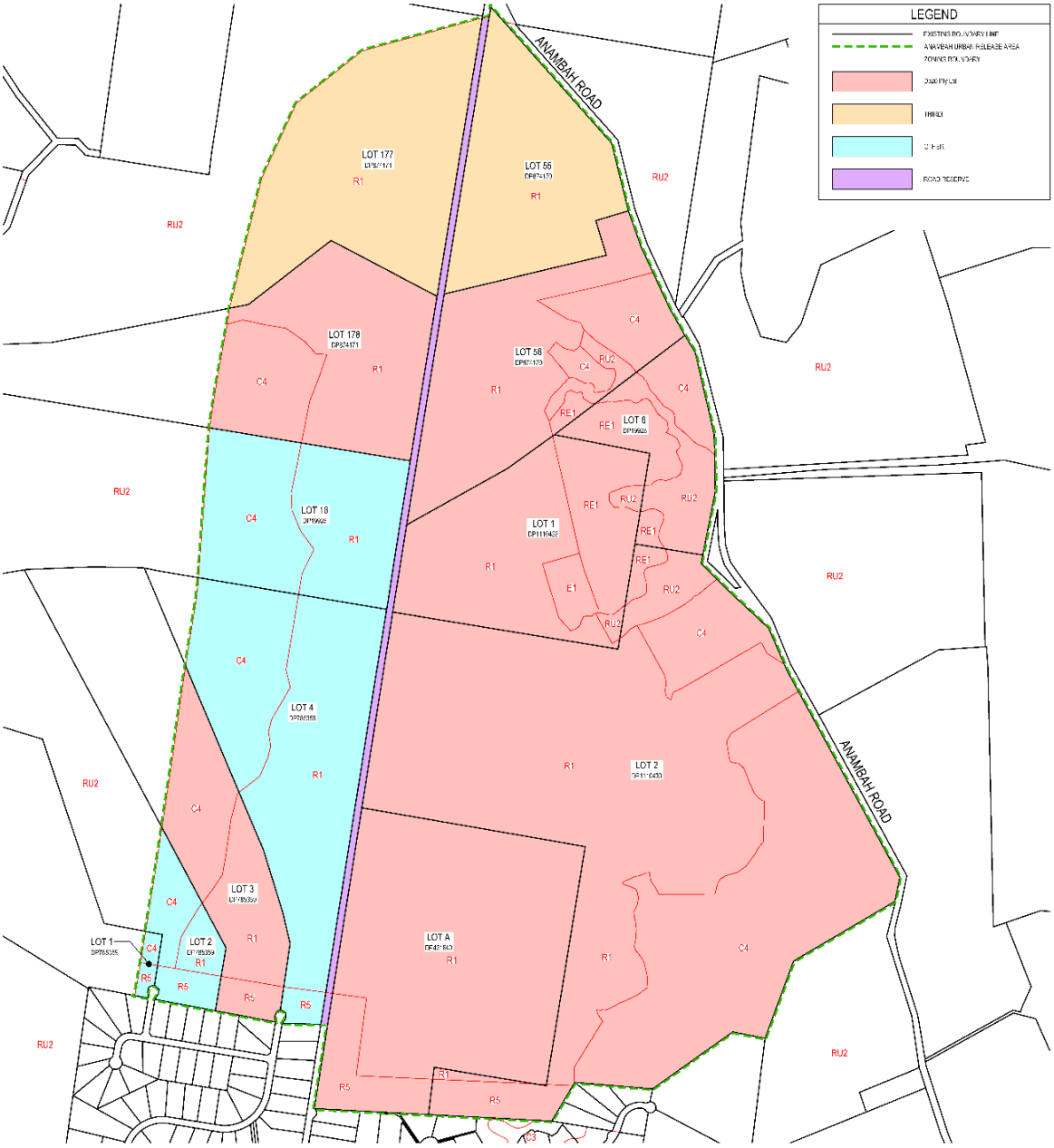
These strategies propose that development of the release are commences with land owned by the Roche Group followed by that of other landholders, once trunk infrastructure is established. Development is generally expected to proceed from south to north, with internal staging to be refined through subsequent detailed planning.

As these strategies were commissioned by the Roche Group, they prioritise an infrastructure staging and servicing approach that prioritises the development their land. There does not appear to be any evidence of a comprehensive or comparative assessment of potential infrastructure servicing options for the AURA. There has not been any consultation with other landowners during the preparation of the servicing strategies.

The development sequence established by the servicing strategies would see 559 Anambah Road developed after the land controlled by Roche Group is completed (expected ~2040).[1] However, Third.i is proposing to progress development of their land earlier and have undertaken additional infrastructure planning in consultation with relevant providers and authorities to identify appropriate infrastructure solutions to support an alternative development sequence.

[1] ADW Johnson (2023), *Water Servicing Strategy: Anambah Urban Release Area*, prepared on behalf of Roche Group.

Figure 1: AURA and boundaries of main landholdings



Source: Groundswell Engineers (2025), AURA Land ownership plan.

Table 22: Land ownership, 2025

Part of land hold within AURA	Area (hectares)	Area (% total area)
Third.i Communities	65	13%
Roche Group	325	66%
Other (combined)	95	24%
Remaining (road corridors)	6	1%
AURA total	490	100%

1.2 Rationale for preferred and alternative development sequencing

It is commonly understood that establishing a preferred sequence for greenfield development provides a logical framework that enables infrastructure agencies to plan and coordinate their investments with greater certainty, and in a manner that minimises the overall net present value cost of extending all categories of infrastructure into new urban areas.

However, the process of developing new urban land in an orderly manner should not be strictly bound by this preferred sequencing if an alternative sequence can be shown to yield a net community benefit.

A firmly fixed development sequencing can reduce housing choice on the fringe and create monopolies, impacting the timing of housing supply, and, in turn, housing innovation, quality and consumer choice.

Opportunities to propose an alternative development sequence to the planned sequence is crucial to ensuring competition between landowners/developers, to avoid monopolistic behaviour in the land development process, and to accelerate housing supply.

That said, there are formal 'tests' that need be applied to ensure that any proposed alternative development sequence is justified when compared to the preferred sequence. Namely, that pursuit of the alternative sequence would result in:

1. A coherent community: The proponent's project will form a viable and cohesive community in the short term, and
2. Cost neutrality: The proponent enters into an agreement to compensate all public infrastructure agencies (local and state) for the additional infrastructure costs caused as a result of the project being out-of-sequence.

The rationale for these tests is described in more detail in Chapter 2.

1.3 Council's position

Third.i's proposal to pursue at alternative development sequence has raised concerns with Maitland City Council. Council has described the application as "premature, out-of-sequence, and lacking evidence that it can stand alone."

In a Request for Information (RFI) in relation to the development application for 559 Anambah Road, Council raises several specific concerns, namely:

- The Concept Master Plan does not meet Clause 4.23(3) of the EP&A Act 1979 or Clause 6.3 of the MLEP 2011, as it lacks sufficient detail and does not demonstrate that development will occur in logical, cost-effective development as required by regulation.
- That the proposal to use River Road as an emergency access and utilities corridor will inhibit the orderly development of the land to the south.
- That insufficient information has been provided to demonstrate that essential utility infrastructure will be available when required.
- That services will not be available to meet the needs of future residents, including commercial uses, open space, and capacity to provide services.
- That further consideration is needed regarding upgrades to road networks (including the New England Highway / Anambah Road roundabout), and public and active transport networks.

Council has also raised concerns that starting development at the northern end of AURA would increase infrastructure costs, leading to higher lot prices and reduced housing affordability.

1.4 Report purpose

The purpose of this report is to provide an assessment of whether the alternative development sequence for the AURA as proposed by Third.i communities could be justified by reference to the two tests described above.

Our working hypothesis is that, provided the alternative development sequence does not result in additional costs to public authorities, infrastructure providers, other developers, or to future residents, by accelerating housing development in the AURA, it is likely to deliver a net community benefit.

Planning for both the land at 559 Anambah Road and the broader AURA are ongoing. The report is based on information available as of May 2025.

1.5 Report structure

Following this introduction, this report is structured as follows:

- Section 2 sets out the economic rationale for supporting out-of-sequence development and the conditions by which a proposal may be considered.
- Section 3 assesses the Third.i development against the first condition related to the development of a coherent community in the short term.
- Section 4 assesses the Third.i development against the second condition related to ensuring the cost-neutrality of this type of development.
- Section 5 discusses the question of infrastructure cost and housing affordability.
- Section 6 provides a summary of key findings and conclusions drawn from the previous sections.

2. Managing development sequencing

This section outlines the rationale for both a preferred development sequence and for permitting alternatives to development sequence. It goes on to discuss, in general terms, an approach for managing the risks of alternative development staging through cost impact assessments.

2.1 Benefits of sequenced development

Councils need to facilitate urban growth while ensuring that infrastructure delivery is financially sustainable and strategically coordinated. Greenfield development in particular places significant demand on government and community resources – requiring investment in arterial roads, schools, public transport, healthcare, and local facilities. These are not only capital-intensive but also involve ongoing costs for service provision, which are funded through taxes, user fees, and charges.

2.2 Sequencing, competition, and housing supply elasticity

While the sequencing of development has obvious advantages, prescribing a fixed staging pattern for development, whereby a particular development area or front is 'substantially' completed before a new one is opened up can be problematic. It would reduce housing choice on the urban fringe and would most likely hand monopoly power to owners of urban designated land which is privileged by the staging plan. This could militate against market competition and limiting the ability of developers to respond quickly to demand for new housing. A healthy development market with multiple active housing suppliers can increase dwelling yield over a fixed timeframe as total production capacity is expanded.

These challenges suggest the need for an approach to development sequencing (and infrastructure provision) that recognises the cost impacts of alternative development sequencing without automatically preventing it.

Allowing an alternative development sequence under defined conditions (including offsetting additional infrastructure costs) can help strike a more effective balance between infrastructure efficiency and broader strategic planning objectives.

The proposal to pursue an alternative sequence to the preferred development sequence at AURA may appear to offend the principles of orderly planning, however, it is a concrete example of competition between local developers that is expected and encouraged in a market economy. In fact, restricting development to the preferred sequence provide monopoly power to the one landowner by preventing other landowners from supplying land for housing.

2.3 Managing the risk of alternative development staging

This section describes an idealised model for infrastructure planning that would permit infrastructure providers, planning authorities and developers to manage the risk associated with alternative development sequencing.

Councils play a critical role in guiding the development of urban growth areas to ensure competitive land markets, responsive housing supply, and the provision of required infrastructure. The objective of maintaining competitive dynamism in the greenfield housing market requires a more appropriate allocation of staging risk. Specifically, this risk should rest with the party best able to manage it – the private sector.

Developers should be permitted to undertake 'out of sequence' projects at their discretion, provided two conditions are met:

1. The alternative sequence will result in a coherent community in the short term, and
2. Any demonstrable increases in costs to public infrastructure agencies (local and state) are funded by the proponent

This approach would ideally provide benchmark sequencing for the rollout of urban infrastructure that represent the most cost-efficient development pathway, considering major infrastructure costs across all relevant domains. The benchmark sequencing should reflect the preferred order of development based on a consolidated and prioritised view of infrastructure delivery plans from all key government agencies.

Both councils and State Government agencies would base their infrastructure investment strategies on an agreed sequencing plan. Developers wishing to pursue projects which are not in line with the benchmark sequence would be required to compensate the relevant infrastructure agencies if this variation from the agreed sequence causes extra costs, in present value terms, for these agencies.

To support this process, developers would be required to prepare (or fund) a cost impact assessment for any agency that identifies a potential cost impact. These assessments would compare the present value cost of infrastructure delivery under the agreed sequence with the cost under the proposed variation.

When an alternative proposal is submitted, Council should refer the proponent to the relevant infrastructure agencies (e.g. transport, education, health) that have flagged a potential cost impact. Each agency should provide:

- A rollout plan for infrastructure under the current sequencing framework; and
- A modified plan reflecting the proposed development, assuming consistent service delivery standards.

Using this information, the developer would prepare a cost impact assessment and propose a remedy (such as financial compensation or early delivery of infrastructure) for review and approval by the affected agency.

Compensation arrangements should be negotiated between the proponent and relevant agencies and formalised through a legally binding mechanism, such as a Voluntary Planning Agreement.

Once an alternative development is approved and infrastructure rollout plans are updated accordingly, Council should revise the sequencing plan to reflect the new reality. This updated plan would become the new benchmark for assessing future proposals.

2.4 Development sequencing and infrastructure provision in the ARUA

The preceding discussion describes an idealised model for development sequencing and infrastructure planning. However, the situation for the AURA differs somewhat in that there is also no comprehensive government endorsed sequencing plan for development within the precinct and from which departures from the sequence can be readily assessed.

Notwithstanding this difference, the conditions described above provide an appropriate framework for also assessing the impacts of bringing forward development at 559 Anambah Road from that shown in the water and wastewater servicing strategies.

The next two chapters explore the application of each condition in turn.

3. Condition 1: A coherent community

This section assesses the proposed alternative development sequence against the first of two conditions set out at 2.3 above, the condition of ensuring the development will result in a "coherent" community, in the short term.

3.1 Overview

There is no agreed definition, criteria or benchmarks for what constitutes a "coherent" community. And the concept of a coherent community is likely to vary somewhat with context. However, it is generally understood from urban planning literature that a coherent, or functional, community is one where:

- Basic needs are met for all residents in relation to health, education, safety, housing.
- People have opportunities to connect, participate, and build a sense of belonging.
- Economic opportunities are accessible, diverse, and support local prosperity.
- Infrastructure planning is inclusive, sustainable, and adaptable to future needs.
- Resilient and sustainable over the long-term.[2]

Policy has sought to clarify the elements that comprise a coherent, or complete, neighbourhood or community means in urban planning practice. Approaches differ across state jurisdictions in Australia, however, can generally be captured under the banner of "X-minute neighbourhoods". In the *Hunter Regiona*l *Plan* (2022), this is described as in terms of the "15-minute city or neighbourhood".

The section explores how the proposed Third.i development aligns with the principles of the "15-minute neighbourhood" to assess whether it meets the first test for supporting an alternative sequence of development:

> ***A coherent community:*** *The proponent's project will form a viable and cohesive community in the short term.*

The assessment considers the context for the development – being an urban release area, the services and infrastructure to be provided within the Third.i site and nearby urban centres, as well as assets planned for delivery in the future across the broader AURA.

[2] Joynt, A. L. R. (2021), Defining a Well-Functioning Urban Environment: A systematic literature review in response to the National Policy Statement on Urban Development, Discussion Paper, Research and Evaluation Unit, RMIU

3.2 Urban planning policy for a coherent community

The '15-minute city' concept emerged as an approach embedding this broadly agreed set of principles into land planning practice. It has a simple premise, that people living in urban environments should be able to access most of their basic needs within a 15-minute walk, cycle or public transport journey to reduce car dependency, promote healthy and sustainable living and improve the overall quality of life for residents.

The '15-minute city' concept has been adopted in planning within NSW. Recognising the diversity of places across the Hunter region, the *Hunter Regional Plan* includes an objective (Objective 3) to "*create 15-minute neighbourhoods to support mixed, multi-modal, inclusive and vibrant communities*".

Table 3 outlines performance indicators for seven place typologies found across the Hunter Region as outlined in the *Regional Plan*. These typologies reflect the diverse contexts in which neighbourhood planning occurs, helping to ensure that service levels and quality of life are appropriate to each setting.

The policy defines the "General Suburban" typology as urban release areas where land use is typically segregated and dominated by single-detached housing. It notes that these areas may also include features such as a shopping mall and that residents in these neighbourhoods are largely dependent on cars for accessing services and facilities.

In addition, the *Regional Plan* specifies that a small neighbourhood centre is required if the proposed residential yield exceeds 1,500 dwellings or a large neighbourhood centre if the proposed residential yield exceeds 4,000 dwellings.

Table 3: Hunter Regional Plan, 15-minute neighbourhoods, Indicators of performance

Context		Neighbourhood scale Homes are within a 15-minute:	Strategic centre scale Homes are within a 30-minute:
Urban	Urban core	– walk or bike to most daily and weekly needs	– public transport to infrequent and specialised needs
	General urban	– walk or bike to many daily needs – public transport to daily and weekly needs	– public transport to infrequent and specialised needs
Suburban	Inner suburban	– walk or bike to many daily needs – public transport to daily and weekly needs	– public transport to infrequent and specialised needs
	General suburban	– **walk, bike or public transport to *some* daily and weekly needs**	– **public transport to infrequent and specialised needs**
Rural	Villages	– walk, bike or drive to some daily and weekly needs	– drive to infrequent and specialised needs
	Rural residential	– drive to most daily and weekly needs	– drive to infrequent and specialised needs
	True rural	– 30-minute drive to most daily and weekly needs	– drive to infrequent and specialised needs

Source: NSW Government (year), Hunter Regional Plan.

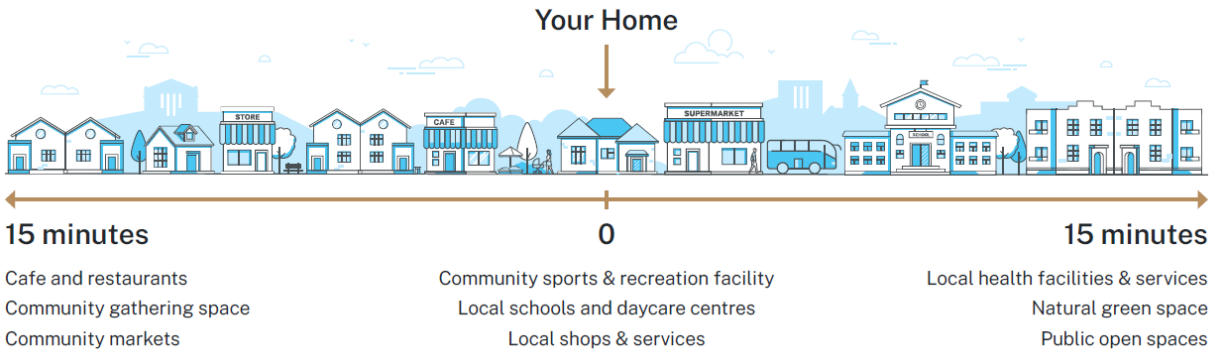
There are some obvious difficulties in interpreting and applying this policy in practice. For instance, the policy:

- Does not provide a comprehensive list of the uses or services that constitute "daily" or "weekly needs."
- Does not make clear what is meant by "*some* daily and weekly needs"; if this delineates between essential and non-essential daily and weekly needs, for instance.
- It implies that driving to access services is a feature of General Suburban areas, however, the *future* role of driving for residents in these locations is not explicitly stated.

Importantly, the plan provides no clarification about timing for service and infrastructure delivery for General Suburban areas given that these areas are characterised as urban release areas, likely to be in greenfield locations on the urban fringe. As in any newly developing area on the urban fringe, the delivery of services is inherently linked to the progressive realisation of dwellings and their associated populations.

Taken from the *Regional Plan*, the figure shown below provides an indication of the types of uses the policy envisages as being within a 15-minute catchment – noting that this applies to all urban context types and is not specific to the General Suburban category.

Figure 2: Hunter Regional Plan, 15-minute neighbourhoods (image extract)



Source: Hunter Regional Plan (year)

Table 4 outlines the infrastructure and services implied by the 15-minute neighbourhood concept, based on references in the policy and SGS's experience in local and social infrastructure planning.

Table 4: Possible interpretation of 15-minute neighbourhood access requirements

Within 15 minute walk, cycle, PT, drive		Within 30 min walk, cycle, PT
– Community sports and recreation – Neighbourhood shops and supermarkets – Pharmacies – Early education and childcare – Public parks and playgrounds – Public transport stops (bus, tram, train) – Cafés and small restaurants – Local post offices or parcel lockers – Community spaces (hall, library, special interest club)	– Supermarket / markets – Cafés and small restaurants – Medical clinics / GP offices – Secondary schools – Libraries / Community centres – Sports and recreation facilities – Religious institutions (churches, mosques, temples) – Government services (e.g., Service Centres) – Bulk retail / hardware stores	– Speciality shops – Entertainment uses – District / regional sports facilities

Source: SGS Economics and Planning (2025)

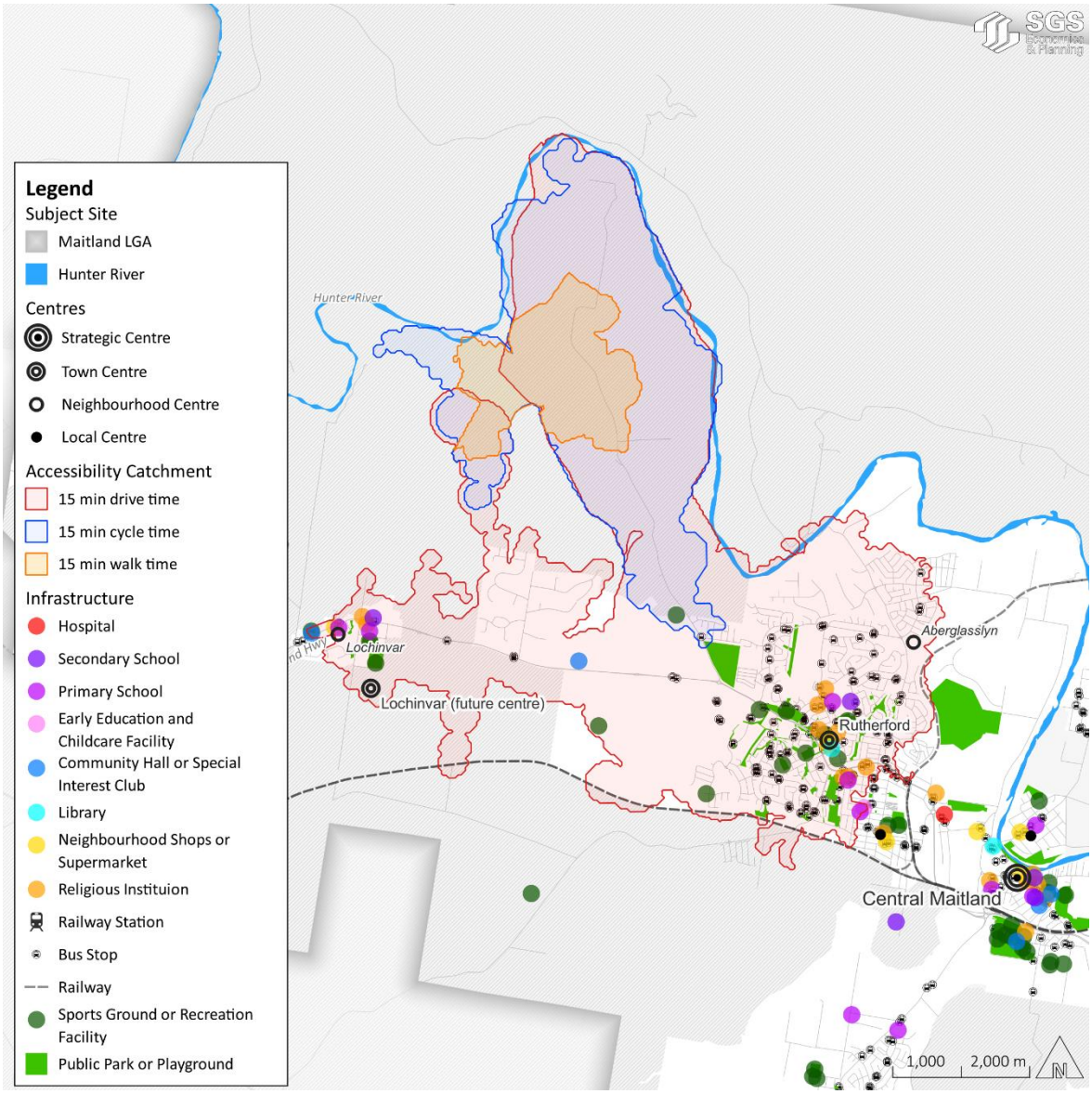
The updated development proposal provided by Third.i shows that the following infrastructure items will be provided onsite:

- Identification of several locations within the site of land appropriately zoned land for the provision of local shops and / or community uses (such as a childcare facilities)
- 15,998 square meters of land dedicated for use as three local parks
- 52,685 square meters of passive recreation space (incl. enhanced riparian corridor)

In addition to the above, pedestrian and cycleway connectivity will be supplied throughout the site and connecting to future development areas to the south. These connections include on road bicycle lanes, shared paths, footpath (one side of road). Public spaces will be furnished with trees, seating and park shelters for improved amenity. Provision has also been made for a public bus route to connect into the site, including a bus-capable carriageway and 4 bust stops. This will likely connect to existing services along Anambah Road.

Figure 3 and Table 5 show the location and number of services and facilities (listed in Table 4) currently accessible from the Third.i site within a 15-minute walk, cycle, public transport journey, or drive. In the short term, before further growth of the AURA area, residents of the Third.i development would have convenient on-site access to recreation spaces and potentially some local retail and community uses, if the zoned land made available is taken up. Residents would also be within a 15-minute driving catchment of many other services listed in Table 3.

Figure 3: Existing services and infrastructure within 15-minutes walk, cycle, PT and drive of Third.i site, 2025



Source: SGS Economics and Planning (2025)

Table 5: Existing services and infrastructure within 15-minutes' walk, cycle, PT and drive of Third.i site, 2025

Infrastructure / service type	Count of facilities within…		
	15 minute drive time	15 minute cycle time	15 minute walk time
Bus stop	141	1	-
Community hall or special interest club	2	-	-
Early education and childcare facility	1	-	-
Library	1	-	-
Neighbourhood shops or supermarket (including cafes, post office and pharmacies)	2	-	-
Primary school	5	-	-
Public park or playground	19	-	-
Religious institution	8	-	-
Secondary school	2	-	-
Sports ground or recreation facility	13	1	-

Source: SGS Economics and Planning (2025)

3.3 Planned future infrastructure and service provision

As noted in the list of limitations of the "15-minute city" above, the *Regional Plan* policy does not provide clarity regarding how the policy relates to the timing and delivery of facilities and services in a release area context specifically. For example, providing guidance around what a reasonable expectation might be regarding access as a release area is undergoing development.

The first residents in a new release are can likely expect that there will be a period in which they will be required to access community infrastructure and services located outside of the area when a development is in its early stages as dwellings are being progressively delivered and population-driven demand is established. This would be the case with any new greenfield development on the urban fringe.

The Draft Anambah Area Plan, included in the former Department of Planning, Industry and Environment's *Plan Finalisation Report* (2020), outlines a high-level structure plan for the AURA. While not a statutory document, it provides the most contemporary strategic vision for the area's future development, including provisions for community infrastructure, such as schools, open space, and commercial and other services to be provided in the proposed neighbourhood centre. Based on this

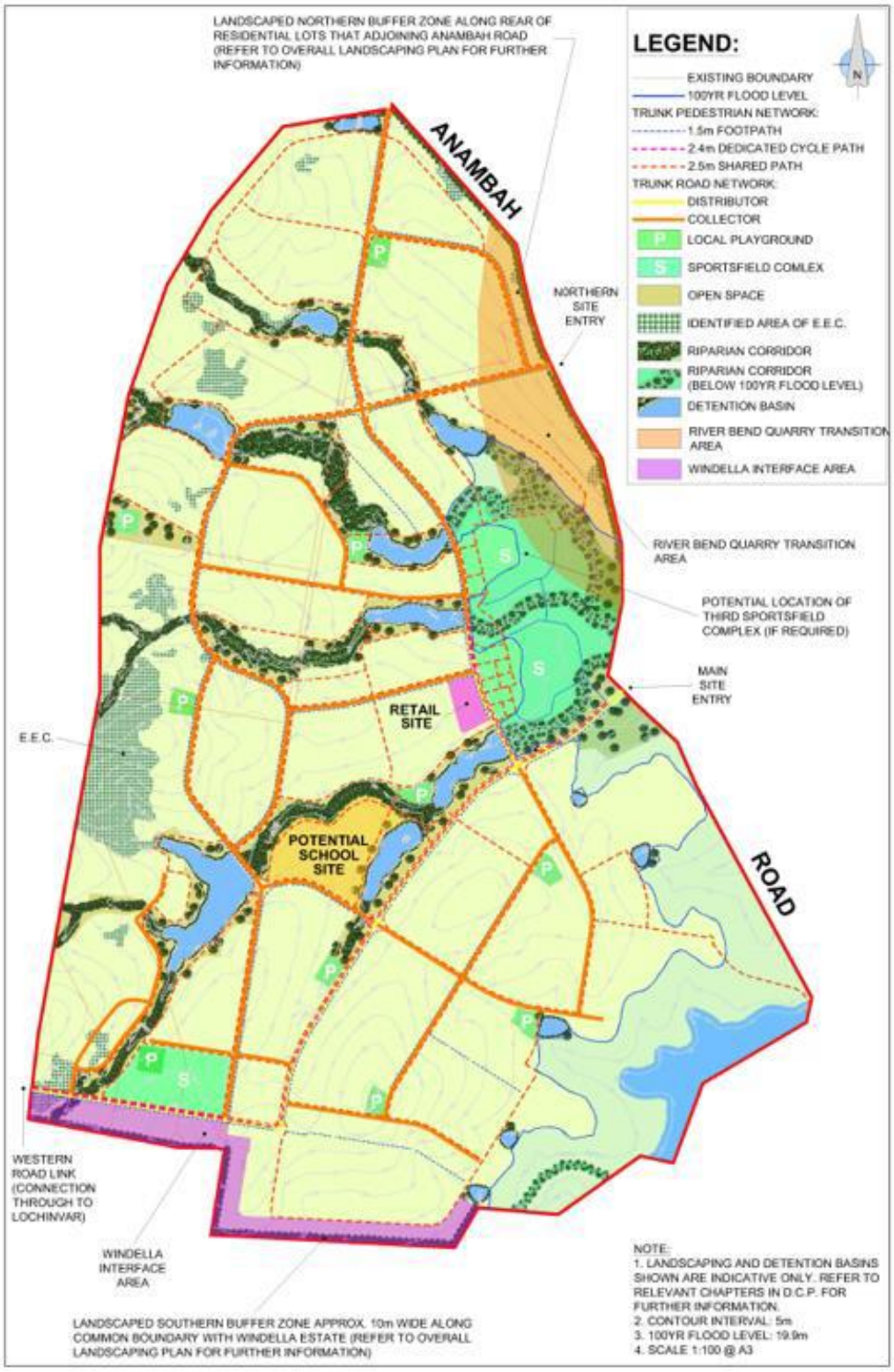
plan, at full development, the AURA is expected to contain the following list of community infrastructure items and commercial spaces.

- Eight play spaces
- Three sports field complexes
- Neighbourhood Activity Centre
- Potential school
- Local parks

Most of these uses are shown within the Roche Group landholding (including the Neighbourhood Activity Centre and potential school site), which is proportionate with the Roche Group's land area. Only one play space is located within the Third.i site (see Figure 4). Third.i has proposed to increase this to three spaces in its current application.

Roche Group appear to have made some progress in planning for the development of their landholding, as evidenced by the detailed plans included in the ADW Johnson servicing strategies. Given this, it is likely that the delivery of proposed infrastructure and services shown in the Area Plan within the Roche site will be provided within a short time horizon. Regardless, if the Roche Group development were to be delayed, residents of 559 Anambah Road would continue to have access to a broad range of amenities within a short distance.

Figure 4: Draft Anambah Area Plan (2020)



Source: Department of Planning (2020), Industry and Environment's Plan Finalisation Report

3.4 Summary and conclusions

The "15-minute city" is an urban planning concept focused on creating compact, accessible, and self-sufficient neighbourhoods where people can meet most of their daily needs, such as work, education, healthcare, shopping, and recreation, within a short travel time from home, usually by walking or cycling.

The *Hunter Regional Plan* outlines policy on the “15-minute city” concept, specifying the types of amenities that should be accessible to residents within 15- and 30-minute walk, cycle, public transport, or car journeys. These access thresholds are intended to support liveability across a range of urban contexts.

Despite the detail included in the policy, there are several limitations to applying it in practice, particularly when considering the patterns of newly developing urban release areas. Much of the infrastructure and services to be provided will be delivered based on demand thresholds. As with any emerging greenfield development, demand will be established over time as dwellings are delivered and associated population increase. Early residents can expect to access services and amenities in surrounding areas, until demand is sufficient to support the delivery of on-site amenities. This is particularly the case for local commercial and retail opportunities which are provided by the private sector.

Mapping of existing infrastructure and services shows that residents of 559 Anambah Road can expect to have access to most of the daily and weekly needs within the catchments for General Suburban proposal by the Regional Plan policy independent of the development of other land holdings in the AURA.

The Draft Anambah Area Plan points to a range of amenities planned for delivery across the broader AURA area. Many of these are planned within the Roche Group landholding. Early residents can expect to access offsite amenities as development progresses.

Given proposed on-site infrastructure, infrastructure available within a short drive (and public transport journey when available) and planned future infrastructure provision, it is reasonable to conclude that the Third.i development will support a coherent community in the short term.

4. Condition 2: Cost neutrality

This section assesses the proposed alternative development sequence against the second of two conditions set out at 2.3 above, the condition of cost-neutrality.

4.1 Overview

As outlined in Section 2, the second condition for assessing the alternative development sequence is that of cost neutrality to government and servicing authorities, and the broader public. In practice, this means that if a change to the preferred development sequence leads to additional infrastructure costs, those costs must be compensated by the developer.

This assessment has been applied to infrastructure categories: potable water, wastewater, road network, electricity and stormwater. Other key infrastructure in AURA—such as open space, community facilities, and stormwater—has been excluded from this assessment due to likelihood that development sequencing will have minimal impact on efficient and timely provision. However, these items may could and should be subject to considered for cost neutrality testing, if this assumption is incorrect.

It is acknowledged that planning for the AURA is still underway, and the infrastructure servicing strategies are yet to be fully resolved. This evaluation serves as an initial step in assessing whether bringing forward of the development of 559 Anambah Road is likely to satisfy the condition of cost neutrality. As planning progresses, further analysis may be needed to assess the comparative costs of each sequencing option and to determine whether there are grounds for compensation to ensure cost neutrality to public authorities and the broader community is achieved.

4.2 Approach

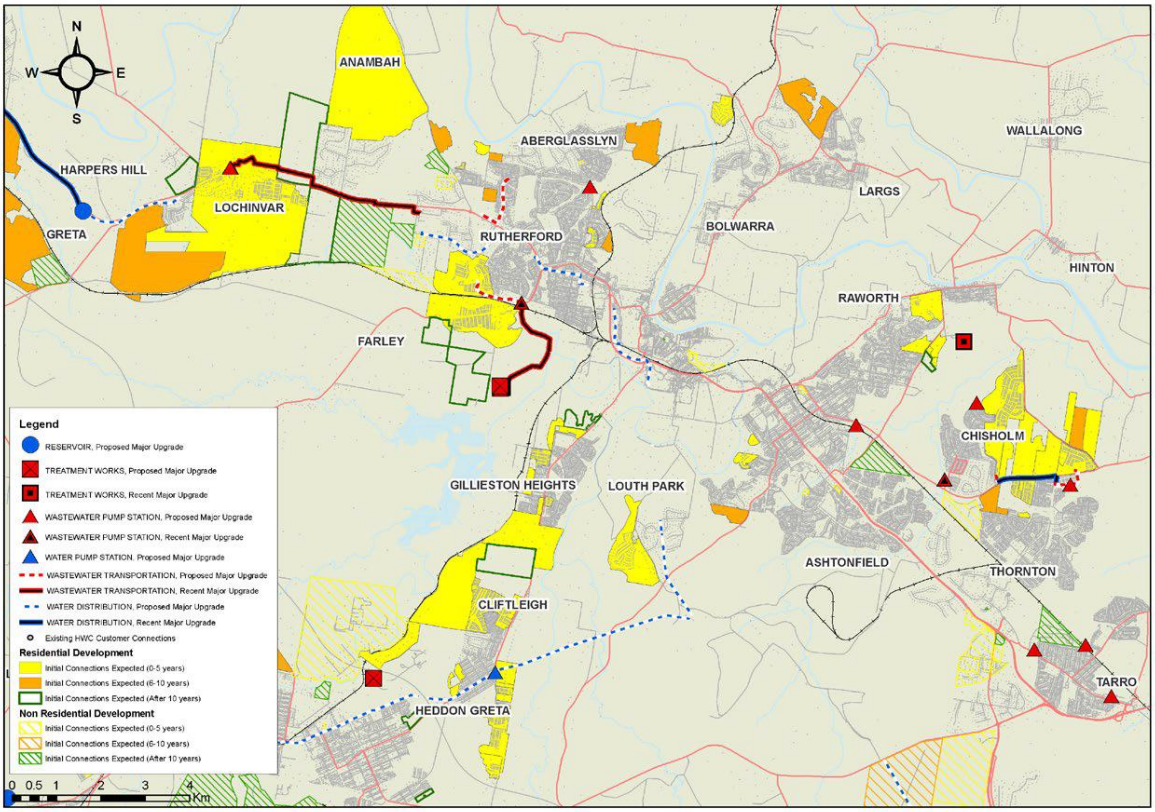
To assess the potential cost implications of the proposal for an alternative development sequence, the following questions have been considered at a high level based on information available for each infrastructure types in the AURA:

1. Is there a formally adopted infrastructure servicing plan? If so, what is the planned infrastructure provision for the preferred development sequence?
2. What changes to infrastructure provision are required to support the bringing forward of development of 559 Anambah Road? Are these changes likely to result in additional costs, in NPV terms?
3. Who will bear these costs, and is there potential to mitigate additional costs to the public sector?
4. Will the changes impact the timing and cost of infrastructure delivery for the remainder of the renewal area?

4.3 Potable water and wastewater infrastructure

Sequencing for the provision of potable water and wastewater infrastructure at a regional scale is established by the *Hunter Water Growth Plan* (2023). This plan identifies the AURA as a development front with initial connections to the HWC network expected within 0 to 5 years. This plan does not distinguish landholdings within the AURA or provide guidance with respect to the internal servicing arrangement. As such, there is no indication of a preferred sequence with the AURA from the perspective of the water servicing authority's adopted infrastructure planning framework.

Figure 5: Hunter Water Growth Plan, development sequencing and servicing growth map, Maitland (including AURA), (2023)



Source: Hunter Water (2023), Gunter Water Growth Plan.

AWD Johnson has prepared water and wastewater servicing strategies for the AURA on behalf of Roche Group. Both strategies have been approved by Hunter Water Corporation (HWC). The proposed infrastructure delivery sequencing assumes that development will begin generally in the southern portion of the Roche Group site and proceed north. Under the ADW Johnson strategies, adjacent lands would remain undeveloped until the Roche site is fully built out; currently projected for completion around 2040.[3]

[3] ADW Johnson (2023), *Water Servicing Strategy: Anambah Urban Release Area*, prepared on behalf of Roche Group.

As these servicing strategies have been prepared by the Roche Group, the proposed configuration and timing for the delivery of potable water and wastewater infrastructure primarily support early development within their own landholding. Notably, these strategies were developed without consultation with other landowners. The strategies therefore may not reflect broader development or servicing intentions across the area, resulting in potential misalignment of infrastructure planning and delayed or inefficient servicing for neighbouring sites. Third.i has commissioned Northrop Engineering for the preparation of two addenda to these servicing strategies with the objective of identifying viable alternative infrastructure strategies to enable development of 559 Anambah Road without having to rely on the prior development of Roche Group's landholding.[4] These alternative servicing plans include the delivery of key lead-in infrastructure network items by Third.i.

In addition, the addenda address future modifications to the network of infrastructure (such as augmentation or realignment) that may be needed for development of Roche Group's landholdings. However, the Northrop addenda note that impacts are expected to be minor, with contingency plans outlined to ensure flexibility to enable concurrent development of landholdings across AURA.

In considering whether there are likely to be costs difference between different infrastructure servicing approaches for potable water and wastewater, it is relevant to consider the way this infrastructure is provide and funded.

Under the *Hunter Water Connecting Asset Funding Standard*, developers fund upfront connection costs for in-sequence developments as identified by the ***Growth Plan***. This includes all land within the AURA. The standard notes that HWC will provide reimbursement to developers for connection (but not reticulation) asset costs after asset transfer, and if delivery timelines are met. It also provides for HWC to repay Lead Developers for upsizing reticulation assets to support future adjacent developments. Estimated costs are set prior to construction, ensuring that HWC is not liable for any cost overruns or escalation.

In addition, HWC employ a "cost-effectiveness test" to ensure its funding for infrastructure assets does not exceed a predetermined cap. Where asset costs exceed this cap, the developer is responsible for funding the additional amount in full.

The combination of the Asset Funding Standard and cost effectiveness test suggests that HWC provides reimbursement to developers within a limited funding window, regardless of the specific approach.

Detailed planning and design work by both Third.i and Roche Group is still underway. Based on information available, however, there is not clear evidence that bringing forward the development of 559 Anambah Road will result in higher costs to public authorities for the provision of potable water and sewer infrastructure for the AURA. If it can be demonstrated there will be additional costs because of servicing 559 Anambah Road earlier, Third.i would consider contributing to these costs.[5]

Therefore, it is likely that the condition of cost neutrality would be upheld in relation to these infrastructure categories.

[4] HWC has provided confirmation that infrastructure can be provided when required in alignment with the program outlined in the addenda

[5] It is also possible that the alternative sequence provides a more cost-effective infrastructure solution.

4.4 Road network infrastructure

There is no specific or adopted sequencing plan for road infrastructure requirements of the AURA. There is no approved plan for the internal road network layout, however the draft Structure Plan map included in the Department's *Plan Finalisation Report* includes an indicative road network layout. This plan is not a statutory document.

The need for several upgrades to the surrounding road network has been identified (i.e. Anambah Road, Windella Road, River Road, New England Highway). The triggers for these upgrades are linked to a combination of time (due to background growth on the New England Highway) and lot development benchmarks and are therefore not tied to, or dictated by, a particular sequencing of development within the release area. Upgrades required are:

- The Maitland LEP designates Anambah Road as the primary access to AURA for the first 1,200 lots. Beyond this, a western link road—extending from Wyndella Road and the New England Highway to AURA's western boundary—will be required.
- Prior to the construction of the western link road, flood free access is required to AURA given the susceptibility of Anambah Road to flooding. This will be provided via River Road, which runs through Windella Estate as specified in Department of Planning and Environment's *Plan Finalisation Report for Maitland Local Environmental Plan 2011* (Amendment No. 26).
- Upgrade of the of the Anambah Road / New England Highway roundabout is required to facilitate the development of the AURA. While not stipulated in a policy or plan, Council has expressed a desire for Anambah Road to be upgraded for safety improvements, road widening and road reconstruction.
- The Department's *Plan Finalisation Report* notes that "if [a] proponent decides to proceed with the interim solution on the Anambah Road / New England roundabout this will be at the proponent's expense." The Traffic Impact Assessment for full development (900 lots) of Third.i landholdings state that "an additional left turn lane for eastbound traffic would be required at the existing roundabout to maintain a satisfactory level of service."

Managing the delivery timing and cost-sharing arrangements for road infrastructure upgrades requires careful consideration and resolution. However, from a development sequencing perspective, the proposition to bring forward the development of 559 Anambah Road would not appear to trigger a need for additional costs for road infrastructure compared to a different development sequence.

4.5 Electricity network infrastructure

There are currently no established plans for the sequencing of electricity infrastructure delivery for AURA. While power utilities will require upgrades to support development of the AURA, they do not appear critical to determining the sequence of development. The need for upgrades is driven by demand from AURA as well as growth in surrounding urban release areas (i.e Lochinvar).

Developers usually pay to connect to the electricity network. If another developer, like Roche Group, uses infrastructure funded by Third.i within seven years, they may owe a 'pioneer payment' to share the cost. However, if a new power line is expected to serve multiple future customers, Ausgrid may treat it as a shared asset and cover the cost.

As it is understood, Third.i's proposed development does not require any additional electricity infrastructure than would be required to service the same number of lots in another site within the AURA as AusGrid works on a "first-come, first-served" basis. Additionally, Third.i are not proposing to alter the alignment of proposed electricity network along Anambah Road.

Therefore, it is not apparent that bringing forward the development of 559 Anambah Road will result in additional costs compared to the development sequence that is implied in the potable water and wastewater servicing plans. For this infrastructure category, the development of 559 Anambah Road is likely to be cost-neutral.

4.6 Stormwater infrastructure

There is no adopted stormwater management plan for AURA. The Northrop Engineering Report (2024), includes a Stormwater Management Plan (SWMP) which states that stormwater can be managed onsite within the land at 559 Anambah Road through onsite detention and water quality infrastructure. Therefore, there costs for stormwater infrastructure are independent of development sequencing and therefore would satisfy the condition of cost neutrality.

4.7 Summary and conclusions

Planning for the AURA is ongoing, with much of the detail regarding planning for infrastructure still to be resolved.

Therefore, based on the information currently available, an assessment of the potential cost impacts and likelihood of cost-neutrality to government and public servicing authorities of bringing forward development at 559 Anambah Road is summarised in the table below.

This shows that sequencing considerations are relevant to planning for potable water and wastewater infrastructure. It is likely cost impacts will be modest and that any additional costs are unlikely to fall to government or HWC. Third.i has signalled a commitment to meeting additional costs arising from its proposed servicing plans.

Table 6: Cost neutrality assessment summary

Infrastructure category	Formally adopted infrastructure sequencing plan by public authority	Approved infrastructure strategy	Cost-neutrality to public authorities of bring forward 559 Anambah Road based on current information	Responsibility for meeting additional costs to public authorities, if any
Potable water	Yes	Yes	Likely*	Third.i if bring forward development at 559 Anambah Road results in higher costs to public authorities
Wastewater	Yes	Yes	Likely*	
Road network	No	No	Highly likely	
Electricity	No	No	Highly likely	
Stormwater	No	No	Highly likely	

Source: SGS Economics and Planning (2025)

*Depends in the specifics of HWC funding arrangements and decisions regarding reimbursement for developer works that are difficult to predict in terms of outcome and timing. On balance it is reasonable to assume that HWC will reimburse a fixed amount for development provided infrastructure in the AURA regardless of the specific sequence of development, unless this can be proven otherwise

5. Do infrastructure costs affect housing affordability?

This chapter considers whether the costs of providing infrastructure to service new housing lots (and the input costs of housing production more generally) affect the price of housing, and therefore housing affordability. It cites some of the academic and other literature on this topic.

This literature support what seems like a counterintuitive conclusion: these production costs do not directly contribute to house prices. House prices are set by the operation of the broader housing market which includes a significant share of the market in existing housing stock, incomes, interest rates, tax settings, relative amenity and access to opportunities (Ong Viforj and Leishman, 2024).

5.1 Developers as 'price takers' not 'price setters'

Commentary from property industry peak bodies and daily media frequently suggests that infrastructure costs, as well as government taxes and charges, directly impact house prices, pushing up prices and making hosing less affordable. Although these claims appear logical – the price of housing is a function of the cost to producing housing – this is not the case.

Developers of housing (or land for housing) are 'price-takers' meaning that they the price they can sell dwellings (or lots) is determined by broader housing markets which include existing dwellings and new dwellings in other locations. The price of new housing is not based on the sum of cost to producing housing (i.e. the prices is not determined on a 'cost-plus' basis).

So, although some segments of the development industry will argue publicly that their costs are 'passed forward' through prices, the reality is quite the opposite. Developers may face different costs to develop land but must compete on price, which is set exogenously.

A 2009 AHURI study of the cost impacts of planning requirements on residential developments reveals this dynamic through interviews with developers. Gurran et al (2009) found that:

> …when faced with uncertainty and system opacity, developers choose to avoid certain local government areas, reduce development activity, postpone land acquisition, or target higher market segments. While some developers reported trying to add specific charges directly to their market price, ***most admitted that a direct transfer of costs or charges was unworkable due to market dynamics***. The variability in costs incurred for similar projects commenced in nearby locations or at different points in time means that some developers pay more in charges than others – but all need to compete within relatively similar market locations. (emphasis added)

5.2 Development costs are capitalised into land values

Housing production is not a cost-plus activity as the price of a major input, land, is not fixed but floating. The value of land will rise and fall as a function of both the value of the prospective use, and the costs to construct that use. In other words, development costs are capitalised into the englobo land values.

In another paper on the impact of planning on housing markets, Peters (2012, pp. 6–7) describes the capitalisation of development contributions into land values as follows:

> … the traditional economic analysis is that [development] contributions (and most taxes and the costs associated with the regulatory part of the planning system) would be "capitalized" in land prices (as traditionally argued by Oates 1969, Orr 1968, Church 1974, Wheaton 1984). In other words, these costs would be borne by land owners, not developers and not potential home buyers. Thus they do not have a direct negative impact on the price of housing. At worst, they may reduce the supply of land at the margin and if so might have a small negative impact on the cost of housing. The reason for this is that the price of urban land both in land economics and in development practice is given by a "residual" – the difference between the market price the highest and best use of the land will generate, and the cost of developing that land for that use. Contributions (and other land taxes) are merely part of the cost of development. There is solid econometric evidence for the existence of this sort of impact (Ihlanfeldt and Shaughnessy 2004, Been 2005, Ihlanfeldt 2006). (pp6-7)

Infrastructure costs, and government taxes and charges, are treated in the same way as 'development contributions'; they are capitalised into the land value of development sites rather than added to the price of the finished lots or dwellings.

This perspective is echoed by Prosper Australia (2023) in a discussion of the impacts of property taxes on house prices. They describe the impacts of these costs on landowners and land values, as opposed to impacting housing affordability:

> Property taxes, such as state land taxes and transfer duties, are not generally passed through to higher rents or house prices. Such taxes are borne by landowners and capitalised into lower land values.
>
> Property can therefore be taxed without affecting housing affordability. The burden of taxes falls on those who own land at the time of the policy change, not those who subsequently buy or use land.
>
> The underlying reason for this is that land, unlike other resources, has no 'cost of production' to ground its price. Land prices are determined entirely by demand. They are a 'residual' reflecting the value of land in use, less costs, so can fully absorb taxes without being withdrawn from supply.
>
> This is widely accepted by economists, but can appear counterintuitive since most other taxes are passed forward in part to end users.

In instances where the developer owns the subject land, additional costs incurred will reduce the project profit margin, and potentially, project feasibility. This is discussed further and shown diagrammatically in Section 5.6 below (residential land value).

The specific mechanics of infrastructure costs being capitalised into land values is discussed in more detail in section 5.5 below.

5.3 Evidence from Australia

There are relatively few robust empirical studies of the impacts of input costs on housing prices in Australia. One example is a Murray's (2018) study which modelled the effects of changes to development contributions (DC) on house price in Queensland. The introduction of mandatory maximum development contributions by in that state provided a 'natural experience' through which Murray could measure the impact of higher and lower contributions on house prices in Brisbane and the Gold Coast. Murray's analysis found that:

> Developer charges, or impact fees, do not increase the price of new dwellings. The economic incidence is purely on the developer (or landowner). Nor do they decrease the rate of new construction. If anything, they can increase the rate of new housing construction. This is why the property development industry lobbies so hard to remove or reduce DCs. They are the ones paying. If they could genuinely pass on these costs in the price of new dwellings, the industry would lobby for them, not against them.

Murray concludes the Queensland case study is evidence "supporting the planning practitioner's view of the charge being economically benign and fully incident on the landowner, even when the landowner is a property developer" (Murray, 2018).

5.4 International evidence

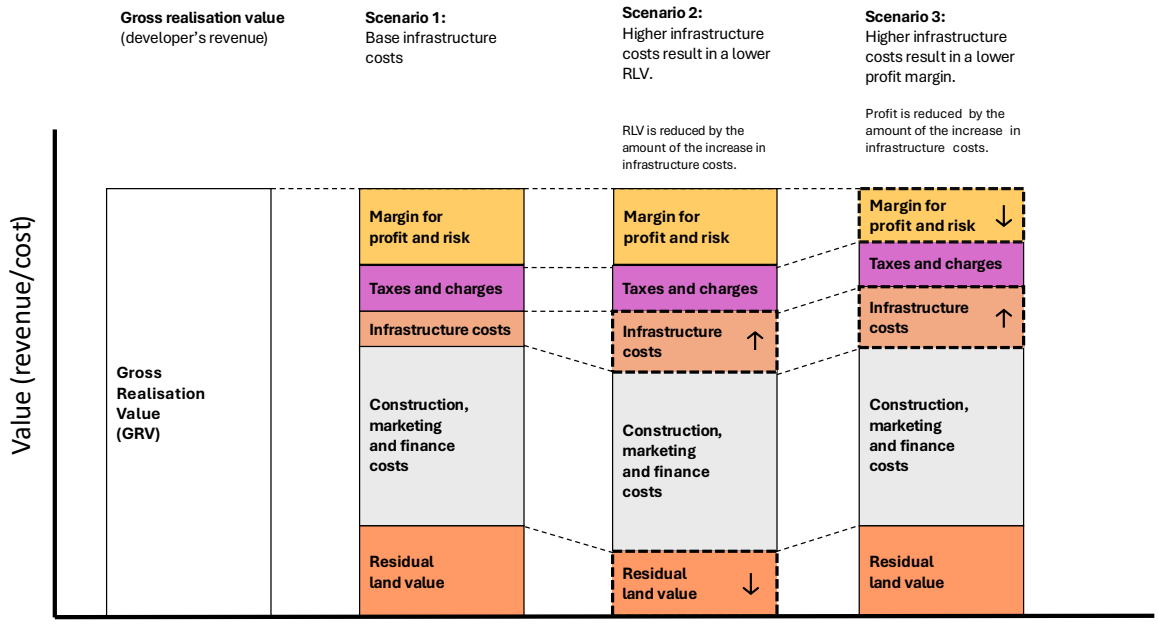
A study by Gurran et al (2009) cited above also considered the international literature on local infrastructure contributions, where the question of the 'incidence' of infrastructure cost – who pays them – has been examined at some length. They provide the following summary of findings from US studies:

> It is argued that the infrastructure and services represent a benefit to the house purchaser without imposing significant costs, because if the impact fee obligation is known in advance, it should reduce the purchase price of the land (Been 2005). Indeed, a major study of the effect of impact fees on the price of new single family homes in the United States found that fees are not added directly to the price of homes (Mathur et al. 2004). However, they could actually have a higher overall price effect, particularly in certain high value markets (Been 2005). The authors explain this multiplier effect by suggesting that the value of the services and infrastructure for home buyers likely exceeds the monetary cost of the fee. By contrast, it has also been demonstrated that impact fees have increased the rate of single family and modest home construction across the state of Florida, perhaps by relieving local authorities of the full costs associated with the new infrastructure needed to service them (Burge and Ihlanfeldt 2006). *Thus, these two studies provide empirical evidence that, rather than undermining affordability, impact fees [development contributions] can lower land values, supporting the provision of infrastructure needed for new housing.* They may also encourage more housing development when existing residents are not financially disadvantaged by having to pay for the service augmentation associated with a growing population. (p36)

5.5 Residual land valuation

The price taking behaviour of developers is evident in the standard method used to calculate the value of a prospective development sites. The residual land value method starts with an estimate of the value of the finished dwellings or lots – the gross realisation value (GRV). From the estimate, development costs are deducted to arrive at the residual land values. Any increase in infrastructure costs must either be passed-back to the land seller as a lower price for undeveloped land or absorbed through a reduction in the developer's margin for profit and risk. The potential impacts on residual land value and developer profits of higher infrastructure cost are illustrated in Figure 76 below.

Figure 76: Impacts of higher infrastructure costs on land values and profits



Source: SGS Economics and Planning (2025)

In Figure 7 Scenario 1 represents a development with nominal infrastructure. In Scenarios 2 and 3 these infrastructure costs are increased. In Scenario 2 they are passed back to the land seller, reflected in a lower RLV. This may occur where the price of the land is contingent on the approved yield or development costs. In Scenario 3 the higher infrastructure costs reduce the developers profit margin. This will occur where the land price has been already agreed, and higher costs cannot be passed back. In either case, the higher infrastructure costs do not increase prices (indicated by the total height of the stacked bars in Scenarios 1, 2 and 3) but are either capitalised into the land value or absorbed in the margin for profit and risk.

6. Conclusion

6.1 Summary of key findings

- Maitland City Council has raised concerns that Third.i's proposed development of 559 Anambah Road is "premature, out-of-sequence, and lacking evidence that it can stand alone", despite there being no formally adopted staging plan for the AURA.
- The process of developing new urban land in an orderly manner should not necessarily be strictly bound by preferred sequencing, if an alternative sequence can be shown to yield a net community benefit.
- Proponents of a proposed alternative development should be supported if it can be demonstrated that it can achieve a) a coherent community in the short term, and b) public infrastructure agencies (local and state) can be compensated for any additional infrastructure costs resulting from the alternative development sequence.
- Within the context of planning for a community in an urban release area, it can reasonably be assumed that Third.i will support a liveable and coherent community in the short term. Residents have access to a range of amenities within a short commute, and further services will be provided as the southern portion of the AURA develops over time.
- There is potential for cost-neutrality to be achieved for infrastructure categories where sequencing is a key consideration – namely potable water and wastewater. This is enabled by HWC assets funding standards, and Third.i's own willingness to contribute to demonstrable additional costs.
- The view that increased infrastructure costs will impact negatively on housing affordability are misplaced. An increase in production costs do not directly contribute to house prices. House prices are set by the operation of the broader housing market which includes a significant share of the market in existing housing stock, incomes, interest rates, tax settings, relative amenity and access to opportunities
- A more material influence will be the extent to which there is genuine competition between landowners to provide serviced lots to the market.
- Strict adherence to a development sequence which prevents competition could slow the rate of lot production, stymie quality and innovation and limit choice to the consumer

6.2 Closing remarks

While Council's focus on orderly development in AURA is understandable, enforcing a fixed staging pattern - where one area must be substantially completed before another begins – can limit market flexibility, reduce competition, and constrain housing choice and affordability.

The aim of this paper was to consider whether Third.i's proposed development sequencing plan is likely to deliver a net community benefit by accelerating housing development in the AURA without introducing additional costs to public authorities, infrastructure providers, other developers in the AURA, or to future residents.

It has been found that Thirdi's proposal is likely to meet the two tests of creating a coherent community and ensuring cost-neutrality.

In Council's assessment of the appropriateness of the development of the Anambah Road site, consideration of the broader question of whether limiting competition to achieve 'orderly development' is in the public interest.

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