# One Stop Centre as a Boon to Property Development Approval Process. A Case Study: City Hall of Kuala Lumpur

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#### **Abstract**

The delays in obtaining local authority approvals for land development have become a universal issue in the property development sector. In the past decades, the approval process in Malaysia was accused of having cumbersome and inconsistency procedures. Recently, the Ministry of Housing and Local Government has introduced a new processing system as the innovative initiative called One Stop Centre (OSC) in each local authority meant to expedite the planning, building and land development approval process concurrently. This study seeks to answer to the question of its achievement towards solving the problems since the OSC was implemented in 2007. The data were obtained through semi-structured questionnaire survey to clients of the OSC and the local authority planning officers. Findings of this study have highlighted that there are positive outcomes towards achieving the objective of its establishment but some areas in the process need immediate attentions.

**Keywords**: Approval Process, One Stop Centre (OSC), Local Authority, Property Development

#### Introduction

The efficiency of local authority services concerning city economic and land development is often called for better improvement to generate and assist the property market institution (Almendinger and Tewdwr-Jones, 2002). Since the city or town governance is the local authority which is either elected or appointed, its roles that may affect the market behavior are related to its position in the state and the overall federal government institutional structures as well as the adequacy of legislative provisions to back up its actions. Although various aspects of local authority's weaknesses can be found in the literature, this paper focuses on the city local authority services that affect property development sector.

The delays in obtaining approvals from local authorities have been the significant issue raised by many researchers and developers with regards to property development particularly within the city (Adams and Watkins, 2002; Evans, 2004; Ratcliffe and Stubbs, 2003). Some researchers have argued that the delay in obtaining planning approvals is the dominant factor that affects the development costs including costs involved in holding of land, man powers, resources, machineries, office rentals, and bank interests (based on the amount of committed loans). Thus, shorter time consumed by the planning approval process may reduce the development costs (Harvey, 2002; Buietlaar, 2004, Tiesdel and Allmendinger, 2005).

Due to the complexity of the planning approval process, however, the delay is not solely caused by the planning department but also by other related technical departments. The technical departments are vested with prerogative powers to play their roles in planning approval process but, their roles are

normally obscured and interestingly, requirements submitted by technical department concerned become conditions of the planning approval. In other occasions, the delays in obtaining building plan approval are also addressed as the delays of planning approvals, while actually this building approval process commences after the planning approval (Goh, 1997).

Undeniably, local authorities have prerogative power to both planning and building approval that directly or indirectly affects the property development process. Moreover, local authorities are playing significant roles in approval processes of land conversion, subdivision, partition and amalgamation for which they are invited to give comments or views although these approval processes are actually under the purview of Land Office (National Land Code 1965). On this basis, the purpose of this study is to uncover some outcomes of the recent innovative initiatives adopted by the local authority to overcome the problem of delays in land development approvals. The important question which this paper seeks to answer is: does the establishment of One Stop Centre (OSC) in the local authority expedite the process of planning, building and land development approvals? To answer this question, this study examines the operation of OSC which is meant to improve the local authority efficiency and as a very important service sector to encourage cost saving in property development.

#### Overview of related literature

Elsewhere, studies in the US have highlighted the one stop business centres as important economic development tools (Blakely, 1994). These centres, which bring together integrated information on planning and development matters, such as labour market statistics, local development plans and land availability, have been introduced as part of local economic development strategies. Such centres play a part in encouraging new business start-ups, attracting new forms to the locality and facilitating business expansion. Their value is seen to lie in eliminating frustrating referrals andhelping to create a good business climate that is positive to development (Illsley *et al.*, 2000).

In the UK, the emergence of new approaches to the provision of public services between 1980 to 1990 hadstressed the importance of meeting the needs of customers. Consequently, there had been an increase in the consideration of the interface between service providers and their clients, particularly with regard to improving access to information and the provision of effective advice and guidance (Ross & Rowan-Robinson, 1994; Illsley *et al.*, 1997). A particular response to the client focused agenda, has been the introduction of single contact points for council services, termed 'one stop shops' (Burdett, 1997). Originally drawn from the retailing analogy of a number of shops located within a single centre, the term 'one stop shop' usually refers to the provision of a range of services from single location or office. One stop shops operate in one of two ways: providing accessto services offered by a single organization or providing access to a range of organizations offering similar or related services within a single locality (Illsley, *et al.*, 2000).

The one stop shop concept is associated witharrangements which bring together development-related functions such as developmentcontrol, building control, roads, economic development, environmental health andlicensing. The intended outcome of such arrangements is to expedite the planning anddevelopment process through a more holistic, efficient and effective decision-makingprocess. The adoption of a one stop approach to planning and development process within localauthorities offers the potential of securing efficiency gains in administration with aconcomitant increase in the effectiveness of the service and advantages to users. It wouldalso be able to address criticisms of planning approval process which are articulated interms of the rigidity of administrative processes, departmental

jurisdiction and associated uncertainties, additional costs and delays in the implementation of development procedures (Evans, 1995; Keogh & Evans, 1992).

In implementing the one stop shop concept, many local authorities in the UK embrace interprofessional working within their organizations. However, the effectivenessand accountability of the inter-professional working is in question. To answer this, it is important to understand the key elements of effectivenessand accountability:effectiveness concentrates on whether or not the arrangement ismeeting its stated objectives;accountability includes the public, in terms of transparencyand access to the inter-agency arrangement, political accountability and financialaccountability(Hambleton *et al.*, 1995).

Illsley, et al., (2000) cite comments raised in the National Planning Forum 1996, UK on the poor practice of the one stop shop that include conflicting advice being given by different officers and different departments, was a lack of co-ordination between officers in different departments resulting in additionalissues and objections being raised at a late stage in the process, officers participating indevelopment control committee meetings who have not been involved with the applicationshowing inadequate understanding of the case, and a lack of staff back-upresulting in applications missing crucial committee deadlines due to illness. In contrast, the integrated development team approach is viewed as being able to provide betterco-ordination between various local authority regulatory services to the property development as well as meet the external requirements of the Ombudsman, Audit Commissionand central government.

## **Malaysian Authorities in Land Development Approvals**

In Malaysia, towns and cities are managed by local governments; they are appointed types of local government and known as a semi-government institution established under the Local Government Act 1976 (Act 171). Since then, they are given autonomy status in terms of how to raise and manage their financial and human resources. The grant from the federal government will only be as a supplementary capital to the city to fulfill its necessary expenditures. Due to the practices that local authorities' income collected through various local taxes and business licenses will finance their operations, better service delivery may generate more economic activities and ultimately will bring more income (Mohd. Razali, 1997).

The local authorities are also the local planning authorities to their administrative areas (under the Town and Country Planning Act 1976). They are positioned at the third layer of the federal government institutional structure and answerable to the federal government, the state and the local residents. In order to perform their duties, local authorities have to liaise with some other government institutions and agencies which carry specific responsibilities and liabilities horizontally and vertically. Bigger cities are usually able to employ technical and professional staffs and have their own technical departments; thus, they are less dependent on the federal government technical agencies. However, in some states, the federal ministries and state agencies still have responsibilities and roles to play as coordinator and controllers. Due to these overlapping responsibilities, the effort to provide efficient government services is hindered by bureaucratic and political agendas. In some occasions, the agency may ignore the agreement for several unknown reasons although the decision was previously agreed. Therefore, a strong leader on top of all the underlying agencies would have been able to ensure that the imperative decision is properly implemented. The institutional set up for land development is shown in Figure 1 below.

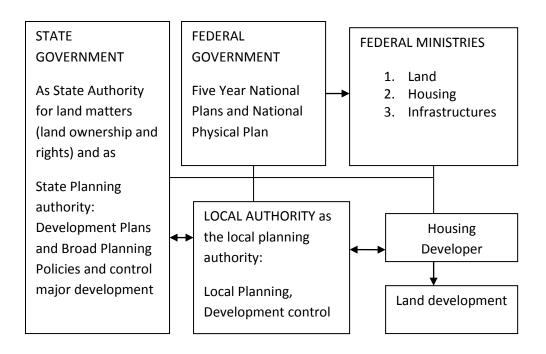


Figure 1: Relations between three tier government institutions for land development

Since the government institutional set up in Malaysia is so complex, the communication and coordination among the vertical and horizontal government agencies are the most crucial area for improvement towards better government delivery services. Although technological enhancement in communication (IT) has been at par with developed countries, coupled with good managerial skills cultivated in the public sector services that have long been implemented, these factors do not always engender satisfactory outcomes especially to meeting the nature of economic and property development needs. Complaints about the delays in approval process remained. Most apparently, the slow progress of the local government services as well as the cumbersome procedures to comply with and lack of coordination among the government agencies are among the major areas required remedial actions urgently, especially to curb the escalating development costs (Mohd. Razali, 2002). In this respect, some developers are of the view that the expedition of government delivery services is one of the key measures to reduce development costs to provide a gap for profits (Lawrence, 1997). Interestingly, the planning approval process is seen to be the one that should be efficient so as land owners and property developers are able to foresee the property development profits while the *transaction costs* are reduced.

## The establishment of One Stop Centre (OSC)

The issue of delays in the approvals of matters related to land development on the part of local authorities and land offices had persistently overheated the Ministry of Housing and Local Government (MHLG). Consequently, the MHLG directed the Federal Department of Town and Country Planning to prepare a proposal to overcome the problem. The Government in the Cabinet Meeting on 25 February 2004 approved the proposal prepared by MHLG, to establish OSC in all Local Authorities in Peninsular Malaysia. Prior to the meeting, there were sequences of preparation (prerequisite actions) taken by the MHLG i.e., the concept of OSC was presented to the National Council for Local Authorities on 18<sup>th</sup> August 2003; consulting all the State Governments to enable the

establishment of OSC secretariats in all local authorities before 15 October 2003; arranged several dialog sessions with related technical and professional bodies and NGOs starting from 7<sup>th</sup> October 2003 until 20<sup>th</sup> January 2004. However, due to the unavoidable constraints such as limited space and cumbersome procedures, the local authorities were allowed to extend the establishment of OSC secretariat until 1 January 2004. The first OSC secretariat to be established was in Ampang Jaya Municipal Council in Selangor and then followed by others. During the trial period, MHLG kept on monitoring and supervising the performance of the OSC. The MHLG presented the report of OSC performance and obtained the Cabinet Approval on 21<sup>st</sup> March 2007. Since then, all local authorities in Peninsular Malaysia have established OSC to deal with planning permissions, land matters and building plan approval (MHLG, 2008).

The major functions of the One Stop Centre (OSC) are to coordinate the applications for Planning Permission, Building Plan approval and Land Conversion, Subdivision and Amalgamation; with the main objective to shorten the approval process. The tedious jobs of the OSC are the distribution of applications to respective technical departments and monitoring the progress of that department concerned. Technical departments are given 14 days to deliver their comments to applications located within an area of having a local plan and 40 days for applications within areas with no local plans (FDTCP, 2007). The OSC will distribute applications to and monitor the progress of respective technical department. Upon receiving the comments from the respective technical departments, OSC officers will prepare reports to the planning committee and then reply to the applicants about the committee decision. If the technical department concerned did not respond after the lapse of the given time frame, the OSC will continue to monitor the application. With optimistic views that this mechanism will reduce delays in the approval process, the MHLG urges local planning authorities all over Malaysia including City Hall of Kuala Lumpur (CHKL) to establish the OSC to deal with planning and building plan approvals.

Although the MHLG has optimistic views that this mechanism will reduce delays in land development approval process, the effectiveness of the OSC needs to be examined.

## The methodology

This study examines the OSC as one of the service sectors which is recognized as very important in fostering the cost saving in property development. Due to a limited time and budgets, this study chooses the OSC of City Hall of Kuala Lumpur (CHKL) as the case study. Theoretically, the case study involves an empirical inquiry that investigates a contemporary phenomenon within its real-life context; so that it can be an exploratory type of studies; is also applicable when there is insufficient literature (Collis & Hussey 2003; Yin 2003; Sekaran 2003, Chua, 2008). Since there is no previous study on the OSC in Peninsular Malaysia, this study adopted the exploratory approach that is to explore the relevant variables contributed to the effectiveness of the OSC service in CHKL.

Exploring the relevant variables affecting the OSC services requires the understanding of the city management system that comprises several 'in-house' players. How these players play their roles make land approval process to be complicated because actions of departments and sections are interrelated; the pre-requisite action from a section and unit will affect the progress of other sections. In addition, there are technical departments under respective ministries also playing pivotal roles in the approval process. Thus, in order to measure the efficiency of the OSC, it is important to visualize the layout of sequent actions of each player whereby action taken and time consumed by each player can be analyzed. Moreover, their clients' are also able to provide information relating to the issues in question. On the above basis, the secondary data were gathered through library search and documented

materials from related departments. The primary data were gathered from the clients and planning officers of both the planning department and the OSC. The targeted clients of the OSC were the housing developers and land owners.

The officers from both departments were interviewed using open-ended and structured questionnaires. While housing developers' representatives and land owners were interviewed using semi-structured questionnaires only. The breakdown of respondents involved in this study were 40 housing developers' representatives, 25 land owners' agents (other clients), 2 planning officers from Planning Department and 2 officers from the OSC. These data were then keyed in into SPSS (Statistical Package for Social Science) spreadsheet for analyses.

## The City Hall of Kuala Lumpur One Stop Center

Kuala Lumpur was formerly the capital town of Selangor State. It was made a Federal Territory as well as the capital city of Malaysia and conferred city status in 1972. In the meantime, Shah Alam was made the capital town of Selangor. Since then, the responsibility for the capital city was transferred to the Federal Government under the Federal Capital Act 1960, which at the same time imposed a unique administrative structure on the federal capital; in which the City Hall of Kuala Lumpur (CHKL) becomes the local planning authority for the Federal Territory of Kuala Lumpur encompassing an area of 94 square miles. The population grew from 919,610 in 1980to 1,423,900 in 2000(CHKL, 2004).

The applications for planning approval received and processed by CHKL are more than 1,000 a month although the actual number of applications depends upon the economic environment. Usually it received huge number of applications during the booming economy. Before 2007, the local authority was incapable of dealing with the applications efficiently through the normal process. The number of applications that can be considered and given decisions in a week used to be below 100. Thus, the mounting back-log of applications plus incoming applications has caused the local authority operation under tremendous pressures.

## The Present Approval Process

CHKL established the OSC in 2007 soon after the announcement made by MHLG that it was officially launching the OSC through-out the country. The OSC counter is located at the mezzanine floor of the main CHKL building at Jalan Raja Laut, Kuala Lumpur. In terms of organization, the OSC is headed by a senior planning officer assisted by several supporting staffs from planning department, building control section and land office. Administratively, the centre is directly under the purview of Deputy Director General (Development).

Since the establishment of the OSC, applications for planning permission, building plan approvals, land use conversion, subdivision and amalgamation of land are addressed to this centre. The centre distributes the application to the respective departments and compiles the comments. The meeting for decision is held at the OSC where the OSC plays the roles of secretariat for the meeting; and responsible for related correspondent works to the applicants. Major activities of the OSC are depicted on Figure 2.

From Figure 2, the possible delays that can be deduced at the OSC are the action taken to record, distribution of the applications, compilation of all comments and setting the date for meeting. Related to activities of the OSC is the mode of delivery (by post or by hand) that also affects the duration of time.

As shown in Figure 2 and 3, the approval process has reflected several changes made to the components of approval process and to the administrative setup for certain tasks in the process. These figures also depict significant players in the land development process, viz: the applicant who can be developer, land owner; the OSC officers; the technical department representatives, land office and the decision makers.

With respect to current process, applications for land development approval can be made to the OSC in three alternative packages as follows:

#### • Alternative 1

 4 applications simultaneously: for land matters, Development Order (Planning Permission), Building Plan, and Earthwork Plans.

#### • Alternative 2

- 3 applications simultaneously: land matters, Development Order (Planning Permission), and Building Plan OR
- 3 applications for Development Order (Planning Permission), Building Plan, and Earthwork Plans.

#### • Alternative 3

- 2 applications: combination of two among the above items of the Alternative 2.

Upon the receipt of an application; the OSC will process it according to the simplified steps as follows:

#### Submission

- The OSC will only process a complete submission set – based on its checklist

#### Comments

 The OSC will distribute copies of plans and related documents to technical bodies including related 'in-house' departments and will monitor the respective application

#### Site Visit

 Site visit will be arranged to investigate the characteristics of the site to ensure that the requirements are fulfilled or can be complied.

## Consideration

 The OSC will table applications to the OSC full-meeting when all the technical comments were ready. The full-meeting refers to the meeting that all technical department representatives are also attended.

### Approval

Decisions from the OSC meeting will be released to the applicant with or without conditions.

Starting from August 2010, CHKL is fully implementing the OSC-online system where applicant will be able to easily get access to the system through the official CHKL website to submit their applications and to get results from it. Hopefully, the OSC-online system will be more efficient than the present counter service system.

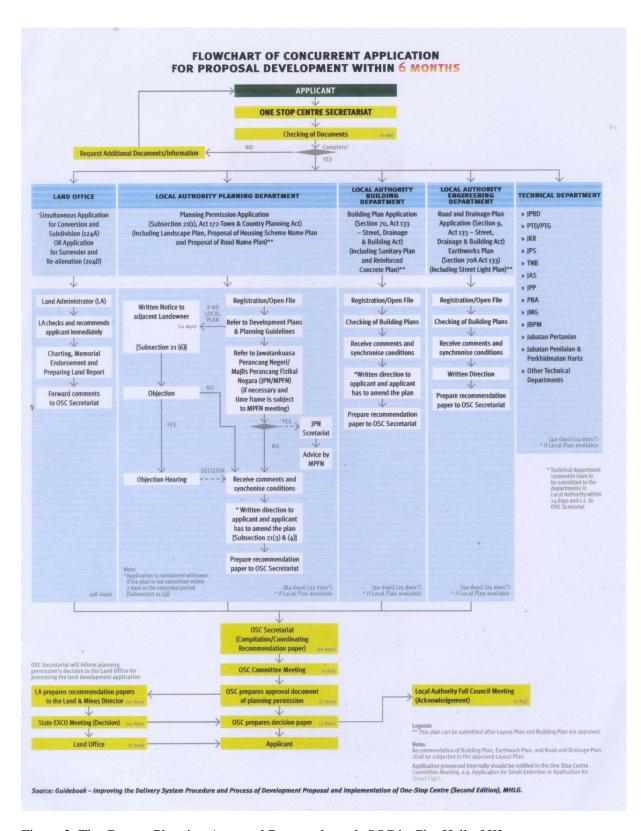


Figure 2: The Current Planning Approval Process through OSC in City Hall of KL

Source: MHLG, 2008.

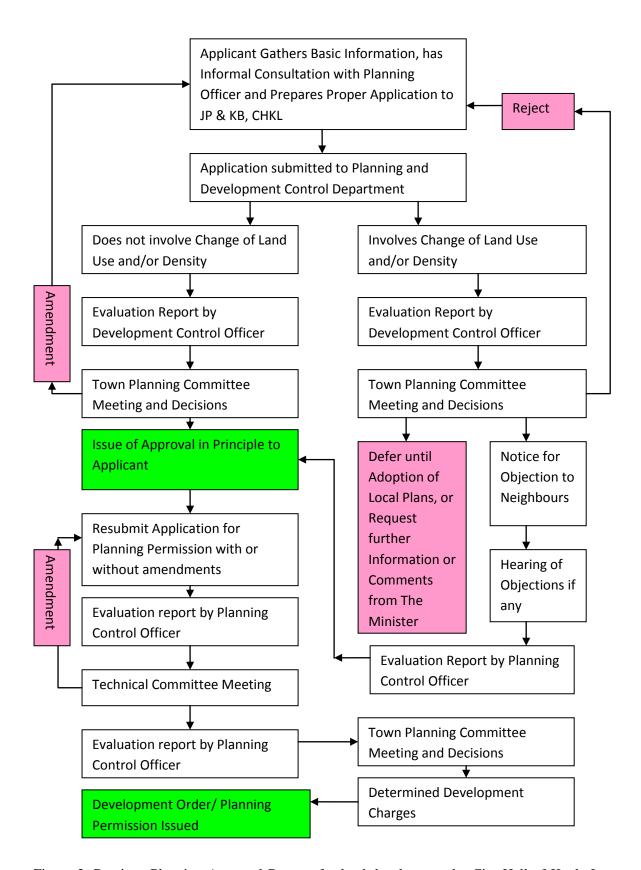


Figure 3: Previous Planning Approval Process for land development by City Hall of Kuala Lumpur (Local Authority)

Source: City Hall Planning Department, 2007.

Effectiveness of the OSC on Approval Process

The OSC has several officers responsible for reception, inquiries, monitoring and distributing works. Their performances are evaluated by their clients. The questionnaire survey on 40 housing developers and 25 respondents of other client category was carried out to obtain the views of the OSC clients. Based on feedback and views of OSC clients, the innovative initiative either brings better local authority service to its most important clients or otherwise which will be further discussed.

After analyzing the data, this study reveals that the complaints from both clients are concentrated on the *modus operandi* of the OSC. They commented that the officers of the OSC were not friendly. Their views are that these officers were very busy and fierce; their language and voice tone could cause someone unhappy. In addition, the officers were not trying to help the clients to solve their problems, such as to give guidance on how to fill-up the appropriate forms, to investigate the application status (though the client should look at the internet), and to give further explanation on cases of rejection. By using the 'Likert' Scale of 1 to 5 ranging from the strongly agree to the strongly disagree, the result of the both clients groups, as in Table 1.1, lean towards strongly disagree. These complaints refer to the degree of officers' public relation skills. Although this CHKL case can be considered as an isolated case, it might also be evident in other local authorities.

Table 1.1: Clients Views on OSC Staffs

OSC staffs	Housing Developers Min, N=40	Other Clients Min, N=25
Attitude	4.5	4.3
Experience	4.4	4.4
Competence	4.4	4.5
Number of staffs	4.5	4.2

The lack of public relation skills among OSC officers can be due to their lack of experiences and followed by competency problems. Besides the OSC officers' attitudes, respondents felt that the OSC suffers from insufficient staff to attend to their problems during peak hours.

With respect to the application procedure, both clients commented that the procedure were not clear and difficult to understand – as shown by Table 1.2. These comments could be related to the fact that the OSC is just in its two years of operation while improvement can still be made from time to time.

Table 1.2: Clients Comments of Procedures

Procedures	Housing Developers %, N=40	Others Clients %, N=25
Not Clear	39	37
Complex	15	21
Do not Understand	46	42

The 'time consuming' issue in the approval process is still raised by the respondents. Some of the applications of which the decision should be notified within 4 months and 6 months have been

extended to uncertain time, which means not all applications can be successfully complied with in the time frame. The OSC clients mentioned that sometime they experience longer than 6 months, and only in a very simple case that the approval was less than 4 months. Interestingly, 65% of housing developers mentioned that the time consumed for their applications was less than 4 months. This achievement is most encouraging, considering the OSC is only two years in operation.

Table 1.3: OSC Time Consuming

Time Consuming	Percent
Less than 4 months (16 weeks)	65
More than 4 months (16 weeks)	35
Total	100.0

(N = 40 Housing developers)

The technical departments have played significant roles in the approval process. Their views and comments vary from site to site and are based on technical reasons, nature of the proposed development and their individual future plan or budget. Some technical departments require longer time to deliver their comments due to their procedures and responsibilities. For example, comments from the Planning Department are based on decisions made by technical meetings within which all relevant facts and figures are discussed. However, the majority of respondents agree that these technical departments are not the most difficult department to deal with but their delays in delivering their final comments occurred when the representative's agreement in the OSC meeting is subject to further confirmation. This means the representative has to consult his/her main office or department for final decision.

## Planning Officers' Comments

After answering the structured questionnaires, the planning officers were also asked to give their overall comments on the OSC. Significantly, their comments are more concerned with the *modus-operandi* of the OSC. One of comments mentioned by a planning officer is that:

"OSC is just as an administrator, the planning process still goes through planning department, but OSC have better staff than planning department itself. Planning departments have more work to do and have to work faster than before, but we are lacking of staff".

The above view refers to how the OSC was established. The staffs of the OSC were picked up from the existing planning department. Senior planning officers were asked to head the OSC, leaving new planning officers to carry out routine planning works in the planning department. This seems to reflect that the implementation of the OSC throughout the country was carried out without recruiting additional planning officers to fill the vacuum. Hence, the nature of the development pressures forces the existing staffs to work harder. This kind of management approach in establishing the OSC has been able to spark a new working culture in planning department.

However, faster output of the new initiative is also considered as the exploiting of the existing resources (OSC and Planning Department). Another planning officer has outlined several suggestions as follows:

- Officers attending [OSC] meeting must be well prepared to make decisions.
- Comments must be standardized, short, and precise.
- PSP [Principal Summiting Person] should know [well]and have prepared through Preconsultation because some [planning] standards differ from one local council to the others. The need of EIA, EA, Geotechnical report, MASMA for example must be prepared earlier.
- PSP should be more responsive or take actions based on comments [made] by technical departments [by] referring to the minutes of the meeting. Amended plans need to be [ready] within 2 weeks [so] as to meet the 'compliance of conditions'.
- In some projects, [representatives of] Bomba [Fire Fighting], DOE [Department of Environment] refer to the Head Office for comments after the meeting. This affects the time consumed, whereas they can do it when they receive the application.

Overall, OSC's officer gives optimistic views by mentioning that:

"Generally, the establishment of the OSC at Local Planning Authority has been able to speed up the process of applications for development proposals. It is because all applications received and the approvals are made at one centre only. Moreover, the OSC meeting is conducted twice a month to consider and make decisions for various planning application plans in order to ensure all the application will be approved before dateline".

When asked about their client attitudes, another officer said:

"So far so good, except people are [rather] reluctant to accept it because it is a new system. Some of them still don't understand and may take some time to embrace the system. Overall, OSC has directly reduced the bureaucratic problem and shortened the previously lengthy duration consumed in the approval process. In addition, it [is] able to increase the effectiveness of Local authority delivery system for land development".

## Discussions

A blanket policy of the MHLG requires all local authorities to implement the new system after the ministry had satisfied with the outcome of the OSC trial operation in Ampang Jaya Municipal Council. The implementation of the OSC in CHKL reflects that it is strongly supported by the Lord Mayor of Kuala Lumpur who also gives full commitment in ensuring the new initiative immediately materialized. Implicitly, the Head of the Land Office Department also gives full support to this initiative, since some officers of the land office officers have been stationed in the OSC at CHKL office. Thus, the key actor in this initiative, the MHLG, has been successful in getting supports from the Heads of the Local Authority, Town and Country Planning Department and other Technical Departments.

Since 1990s, the establishment of OSC for land development approval process was seldom heard of until lately, although the UK and USA have implemented it (Illsley, et al., 2000). In Malaysia the OSC is usually associated with the functions of dealing with consumers' bills and taxes. Since land development approvals deals with detail technical matters, the related technical departments could not ignore the call to exercise their duties as a team which can save decision making and development costs. Evidences in this study show that the departments have also shown their positive commitments in ensuring that the time consumed by the approval process would be within the stipulated time frame. Subsequently, housing developers and government staffs could further strengthen their cooperation to achieve better urban growth. In this respect, it is learned that the 'team work' that deals with complex

activities has shown a desirable result while the problems related to the participation among the authorities do not seem to be significant.

Within the scope of this study, it is fair to say that the performance of the OSC is considered successfully achieving its establishment objective, which is to shorten the land development approval process, which may have addressed the criticisms of planning approval process (Evans, 2004; Keogh & Evans, 1992). Moreover, it is undeniable that the supporting elements have also contributed to the success, particularly the stern policy that 'all applications for land development have to be submitted to the OSC'. This policy seems to be the important driving force towards the success of the OSC. Complementary to this policy, Helpdesks and other IT applications such as Portal OSC and OSC online also play their roles as important tools. Besides the successes, there are evidences of weaknesses in the OSC found in this study which include the level of public relation and communication skill among the officers, unclear procedures, and the normal administration problems.

The findings of this study can be considered rather 'pre-mature' since the OSC is only 2 years in operation. In addition, those weaknesses can be overcome if the MHLG and the local authority officers themselves continuously monitor the operation.

#### Conclusion

The implementation of the OSC in all local authorities is one of the great challenges faced by the administrators. Although long overdue, through Federal Government Ministry the OSC was materialized ultimately. The examination of the OSC in CHKL 2 years after its implementation shows positive perspective views from the main clients in property development sector, while the majority of respondents agree that the establishment of OSC has improved the local government delivery service in land development approval process. Nevertheless, some weaknesses exist within the OSC. It is suggested that the quality of planning officers needs to be improved particularly on the staff competency, procedures and public relation skill. On the part of the clients, the problem related to correspondence elements is also evident. Therefore, it is expected both the OSC officers and the clients will improve their weaknesses and have better cooperation towards achieving the objective of the OSC which will have some impacts on land development costs.

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