

Contact: [REDACTED]
Reference: DOC25/42571

Bronwen Sandland
Independent Pricing and Regulatory Tribunal (IPART) NSW

19 February 2025

Dear Bronwen Sandland

AlburyCity welcomes reforms that will simplify and enhance the efficiency of infrastructure contribution regulations across NSW.

As a major regional city in NSW, and the 12th fastest growing NSW LGA (DPHI projections Nov 2024), we appreciate this opportunity to provide feedback on IPART's "Review of our approach to assessing contributions plans".

Historically, land in our urban growth areas (approximately 8,800 hectares) was owned by the Albury-Wodonga Development Corporation (AWDC) and have been subsequently divested to private parties.

The provision of infrastructure to facilitate development of this land was considered as part of substantial forward planning work undertaken in the mid to late 2000s. Up to 70 years of residential growth (to accommodate 50,000 people) was identified and subsequently rezoned in Albury Local Environmental Plan 2010, with the full support from the Department.

Currently, the Albury Infrastructure Contributions Plan 2014 provides for infrastructure contributions through Section 7.11 & 7.12 of the EP&A Act, and for contributions under Section 64 of the Local Government Act to accommodate Water and Sewer. Section 7.11 and Water and Sewer contributions and charges are applied to our urban growth areas to recover the costs to deliver infrastructure commitments (over \$400 million).

The current IPART review does not address the issues most relevant to AlburyCity currently.

Although AlburyCity currently has contribution rates below the cap of \$20,000, a review of our plan that includes recent land values may exceed the cap. A consequence of exceeding the cap is having the plan reviewed against the Essential Works List, noting that AlburyCity would no longer be able to require contributions for community facilities.

Community facilities as provided by Council are an essential part of regional life. Regional communities do not have ready access to the multitude of private facilities that may be present in metropolitan areas. The review process, (time, cost and the level of information required) and the significant loss of income towards community facilities are a substantial barrier to developing a contributions plan that exceeds the \$20,000 cap.



In relation to the \$20,000 and \$30,000 caps, it is recommended these are increased noting they were first introduced in 2010. These maximum amounts have not changed or been indexed for 14 years despite significant increases in land and infrastructure costs. We also recommend annual indexation is introduced to ensure the cap doesn't continue to fall behind.

In relation to the review of benchmark costs for local infrastructure, we recommend IPART include adjustment factors for environmental considerations in accordance with biodiversity conservation and threatened species (noting Cultural Heritage is covered under allowances) and traffic management costs as they can vary significantly. An adjustment factor for contamination should also be included as the costs can be very significant.

We also note the proposal to use the Urban Development Program growth forecasts as the agreed measure for population forecasts when assessing contribution plans. While this may be suitable, we note that the Urban Development Program only covers Sydney and the surrounding regions. Significant inland regional growth areas such as Albury need to be included. Albury is forecast to be the 12th fastest growing NSW LGA (DPHI projections, November 2024), with Thurgoona Wirlinga in the Albury LGA the fastest growing and largest urban growth area in the Riverina-Murray region.

In summary, we recommend the IPART review seriously considers:

- including community facilities within the Essential Works List – especially in regional areas
- increasing the \$20,000 and \$30,000 thresholds for 7.11 contributions noting these have not been indexed since they were introduced in 2010
- including adjustment factors for environmental considerations in accordance with biodiversity conservation and threatened species
- greater consideration for significant inland regional growth areas such as Albury

Thank you again for the opportunity to raise these matters for further consideration. If you require any further information, please do not hesitate to contact 


Regards,

