

Author name: Name suppressed

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Your submission for this review:

Thank you for the opportunity to provide feedback on the Review of our approach to assessing contributions plans, which aims to improve IPART processes for assessing contributions plans (CPs) and update benchmark costs for local infrastructure. As [REDACTED] has not yet undergone an IPART review of its CP, this submission reflects our current understanding. The feedback and comments below respond to the questions listed. The matters we have identified and commented on may be relevant if we were to apply for an IPART review in the future. I have attached Shoalhaven's Submission for your consideration. To summarise, the review of IPART's approach to assessing CPs and update benchmark costs for local infrastructure is generally supported. However, we would greatly appreciate more consideration and discussions between all councils, IPART, and DPHI specifically regarding the increase to the cap and ensuring benchmarking costs for infrastructure are reviewed more frequently. This is a critical consideration for Council and one that we are keen to see contemporised and then reviewed/revised regularly. Thank you for taking our submission into account. We look forward to continued collaboration to improve the development contributions process.

06/02/2025

Independent Pricing and Regulatory Tribunal (IPART)  
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Dear Sir/Madam

**Review of IPART's Approach To Assessing Contributions Plans**

Thank you for the opportunity to provide feedback on the ***Review of our approach to assessing contributions plans***, which aims to improve IPART processes for assessing contributions plans (CPs) and update benchmark costs for local infrastructure.

As [REDACTED] has not yet undergone an IPART review of its CP, this submission reflects our current understanding. The feedback and comments below respond to the questions listed. The matters we have identified and commented on may be relevant if we were to apply for an IPART review in the future.

To summarise, the review of IPART's approach to assessing contributions plan (CPs) and update benchmark costs for local infrastructure is generally supported. However, we would greatly appreciate more consideration and discussions between all councils, IPART, and DPHI specifically regarding the increase to the cap and ensuring benchmarking costs for infrastructure are reviewed more frequently. This is a critical consideration for Council and one that we are keen to see contemporised and then reviewed/ revised regularly.

Thank you for taking our submission into account. We look forward to continued collaboration to improve the development contributions process.

- ***Do you support using a suitable land value index to update land costs in your CP? Is there any other guidance about our assessment of land acquisition costs that would support your preparation of CPs.***

A shift to a Land Value Index (LVI) to update land costs is generally supported, particularly given the rapid increase in land acquisition costs.

- ***Do you support IPART using Urban Development Program growth forecasts as the agreed measure for population forecasts when assessing contribution plans?***

The use of the Urban Development Program (UDP) growth forecasts as the agreed measure for population assessments is not supported. A "top-down" approach, which distributes overall state population growth among local government areas, does not take into account various localised factors and nuances.

Population forecasts that more accurately reflect actual conditions would be supported. For example, a more comprehensive analysis that considers zoned land, development trends, migration patterns, local birth rates, infrastructure, and development approvals. Shoalhaven's demographic data is prepared by [forecast ID](#) and we believe this represents a more accurate view of population growth for the LGA.

- ***Do you have any feedback on our proposal to provide guidance to councils on our assessment of reasonable timeframes in CPs.***

Reasonable measures to reduce the timeframes in assessing CPs is generally supported. However, it is noted that the assessment timeframe for CPs has previously been lengthy (6-18 months) and has increased again despite recent moves to a 6-month review period. Prioritising measures that can speed up the review process is supported, as extended delays can hinder councils from implementing necessary infrastructure improvements, and lengthy assessments may render cost estimates outdated.

Updating CPs every 3 to 5 years is not always achievable for a large regional LGA like Shoalhaven, given resource constraints and funding required to undertake a plan review. It is reasonable to assume that many councils (including Shoalhaven in the past) would avoid undertaking the IPART review process as it potentially presents an additional challenge for councils that desperately need the boost to fund infrastructure to support development.

DPHI has recently clarified that they will not review the cap in the near future, until expenditure levels are higher. This situation is becoming unmanageable for many councils that find that an IPART approved plan is not in the best interest of the community. It is critical that the cap is reviewed now and then kept updated.

- ***Do you have any feedback on our proposal to develop guidance on how we identify and assess the Practice Note criterion 'other relevant matters'?***

This is generally supported. However, it is important to recognise that the issues impacting regional communities differ significantly from those affecting metropolitan areas; therefore, these distinctions must be appropriately identified, considered and managed. It would be disappointing if a 'one size fits all' approach is pursued.

Enabling opportunities for councils/stakeholders to express their concerns and actively contribute to the formulation of more effective CPs will enable Councils to collectively improve our processes and sustainability. Ongoing engagement with councils and stakeholders is welcomed.

Council participates in an NSW Contributions Planners network that meets quarterly to address various issues within the contributions space. Having IPART regularly attend these meetings to gain insight into the ongoing challenges would be beneficial.

- ***Do you support a performance-based approach to assess nexus for open space, consistent with the Draft Greener Places Design Guide?***


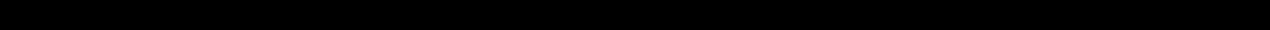
Generally, yes. However, for councils with settlement patterns, geography, and landscape conditions outside of the scope of the Greener Places Design Guide, it is recommended that precedence be given to consideration of the base of evidence provided by councils, including any open space strategies (such as Shoalhaven City Council's [Community Infrastructure Strategic Plan](#)). This will ensure that IPART is able to take into consideration matters relevant to councils across a range of contexts, including metropolitan, regional, semi-rural, rural, and remote settings. Again a 'one size fits all' approach should be avoided.

- ***Do you have any feedback about the list of local infrastructure benchmarks? Are there any other infrastructure items that you think should be included?***

The costs presented for civil infrastructure seem to align closely with expectations and serve as a solid foundation for discussion and planning. The one exception is for roundabouts, as the cost listed is well below what is expected. We would welcome further discussion with you on this point.

- ***Do you have feedback on the methodology used to develop the draft aggregate benchmarks?***

The adoption of aggregate benchmarks for infrastructure costs, rather than evaluating individual items, is supported.

If you need further information about this matter, please contact   


Yours faithfully

