

Landowner submission in relation to IPART draft assessment report of the West Dapto Contributions Plan 2020

I am a landowner of property within Stage 5 of the West Dapto Urban Release Area (WDURA) and I thank you for the opportunity to comment on IPART's Draft Assessment Report of the West Dapto Contributions Plan 2020.

From my review, I understand that the West Dapto Contributions Plan is proposed to be revised in accordance with recommendations made by IPART and advice from the NSW Department of Planning, Industry and Environment (DPIE) that the Local Infrastructure Growth Scheme (LIGS) ends on 1 July 2020.

Following my review of IPART's draft assessment report, I would like to draw your attention to the following specific matters requiring IPART's further consideration:

1. I support IPART recommendation 22 as to the apportionment of costs between stage 5 and stages 1 to 4 of WDURA, as the proposed apportionment of costs would more equitably reflect the demand for infrastructure. As an example, Table 3, Page 5 of the Draft West Dapto Contributions Plan provided by Wollongong City Council (WCC) indicates that 78% of developer contributions are transport related. However, Table 11 and 12 indicates that only 3 of the 29 road upgrades are associated with Stage 5. Furthermore, future residents in Stage 5 would have direct access to the M1 south and north. WCC's proposed apportionment of costs equally across all five precincts is therefore unreasonable and inequitable
2. I support IPART recommendation 24 as to a 3-year comprehensive review of the contributions plan but with the aim of optimising and reducing the contributions based on actual costs incurred, more accurate cost estimation and design review of more cost-efficient ways to deliver infrastructure. Consequently, I request that IPART include an additional recommendation for WCC to engage the service of an independent civil design firm with strategic cost estimate expertise to review and simplify the infrastructure design and provide cost estimates to a higher level of accuracy (lower level of contingency) in order to reduce overall development costs. This would give greater certainty as to developer contributions to better encourage investment in the establishment of the new Marshall Vale village centre in Stage 5.
3. Whilst your draft assessment comprehensively assesses the cost of the plan, there appears to be limited assessment of WCC's funding model and if they have properly considered other funding options. This funding model would substantially impact the contributions required. IPART should therefore consider addressing why WCC is seeking to charge contributions in excess of the \$30,000 per lot threshold and consider making recommendations for alternative funding options to encourage developer investment. For example:
 - a. Avenues for further infrastructure funding assistance from state and federal government
 - b. A more broad-based and modest rate payer charge increase spread across all WCC rate payers
 - c. The inclusion of new rate payer funds within the WDURA to fund the contributions as development progresses and rate payers come on line

- d. Reduced, staged or deferred contribution arrangements to further encourage developers who propose works to accelerate the development and establishment of the Marshall Vale commercial town centre in Stage 5. This would have the effect of accelerated development of surrounding residential development, rate revenue and economic viability
- 4. Government consideration should also be given to extending the \$30,000 per lot contributions cap due to expire in July 2020 given the economic uncertainty regarding the Coronavirus and its impact on the rate of investment in the WDURA, particularly in the development of the town centre in Stage 5. This would further encourage and bring forward development of the Marshall Vale Town Centre and surrounding residential development
- 5. Whilst IPART addresses WCC's response to its prior recommendations in the Appendix, there is no similar assessment of IPARTs' or WCC's response to the submissions received by WCC in relation to the draft WDURA contributions plan. This would be useful to include to make sure stakeholders feel heard.
- 6. IPART should consider recommending that WCC publicly exhibit for submissions their plans for revised storm water management works, detention basins, public facilities, parks and other major infrastructure changes, including their location and affected land area. This should include a letter delivered to affected land owners to ensure they are properly aware and directly consulted of proposed changes that affect their land holdings

Thank you for the opportunity to provide feedback on IPART's draft assessment of the West Dapto Contributions Plan. Should you wish to discuss this matter further and/or require any additional information, please contact me on [REDACTED]

Regards

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27th March 2020