

Submission in Relation to the
Assessment of West Dapto Contributions Plan 2020
IPART Draft Report

Thank you for the opportunity to comment on the IPART Draft Report. We are landowners in Stage 5 of the West Dapto Urban Release Area and we also tendered a submission to the Contributions Plan 2020.

Our comments in this submission have been informed by our consideration of the IPART assessment report of the West Dapto Contributions Plan 2020 as well as

- reference to advice provided by WCC staff to Council (16.03.2020) regarding IPART's assessment of the Plan, and
- WCC Draft Housing and Affordable Housing Options Paper (16.03.2020)

We recognise that IPART's invitation is for submissions addressing the matters discussed in the report, but we consider Council's response, especially to Criteria 5, 6 and 7 as discussed at Cross category considerations, raises some serious broader issues relating to

future affordability of residential land within the WDURA, and

its possible impact on the planning priorities for future housing growth.

We therefore ask IPART to broaden draft recommendation 24, and we give our reasons in discussion below.

We consider IPART's assessment of the West Dapto Contributions Plan is comprehensive and reasonable.

We support the cost reductions to the Plan as well as IPART's recommended approach to determining and apportioning costs.

Criterion 5: Apportionment

We agree with IPART's finding that it is not reasonable for Council to charge the same contributions rate in Stage 5 as in Stages 1-4, for transport infrastructure, stormwater management, and administration costs

Council (16/03/2020) disagrees and tenders preliminary indicative altered rates estimates resulting from the two-catchment approach:

Council Proposed Single Rate	\$52,951
Stages 1 - 4 indicative Rate	\$58,000
Stage 5 Indicative Rate	\$33,000

The altered rates are unacceptable to Council and Council argues that the benefit of infrastructure in one stage "socialises the contribution" to infrastructure in all stages.

Criterion 6: Consultation

We accept that IPART's finds *'council's process for consulting on the plan satisfies the consultation criterion'*.

While the process for consulting might satisfy the criterion, there is little evidence that there was serious consideration by council of submissions to the plan.

We note that IPART requested Council consider submissions after the plan had been sent for assessment.

Normally, a plan would be updated to incorporate any post exhibition amendments.

The main concern raised in submissions was Council's approach to apportioning costs across the 5 Stages.

Council (16/03/2020) maintains its proposed flat rate position on rates and, in support, reproduces the same *'detailed reasoning'* as accompanied the exhibited plan.

The lack of modification to the *'detailed reasoning'* suggests (to us) there was scant consideration of any points raised in discussion in submissions.

We therefore question council's sincerity in consultation and their commitment to ensuring *'that all submissions are adequately considered'* (WCC 2/09/2019).

Likewise, other significant concerns reported by IPART as having been raised in submission, have not been addressed:

- ***The high contributions rates relative to the value of land in the plan, and the impact of removing the State Government's LIGS funding from July 2020.***
- ***Issues with the location and alignment of some infrastructure (including roads and open space***

We think these matters are relevant to and have bearing on Criterion 7, draft recommendation 22.

Criterion 7: Other matters

Draft recommendation 24

We support IPART's recommendation that Council comprehensively review the plan within the next three years.

The five years time span proposed by Council is too long.

It would mean only two reviews of the plan would be completed within the first ten years of the Plan, rather than the five committed to by Council.

Most of the works in the Plan involve transport infrastructure and are yet to be completed. Therefore review within three years (at the latest) is necessary to ensure the scope, cost and apportionment of work accurately reflect development.

Other matters

- West Dapto Urban Release Area is regionally and State significant.
- Government, under several different schemes, has contributed funding to WDURA.
- *"The West Dapto Development Contributions Plan is a key document for the Urban Release Area as it provides the mechanism to collect development contributions to fund essential local infrastructure required to support new development in the future communities." (WCC 2/09/2019).*
- It is critical that an affordable and workable plan is in place.
- State Government forecasts that Wollongong's population will increase by 33,000 - 45,700 in the next 16 years.
- Council (16/03/2020) endorsed a **draft Housing and Affordable Housing Options Paper for development of an updated Housing Strategy for the LGA.**
 - The planning priorities for housing are listed as:
 1. Increase housing stock diversity
 2. Plan for future housing growth
 3. Increase supply of affordable rental housing stock.
 - Stage 5 was advanced to rezoning because its design includes a diverse range of housing product, including affordable housing. Proposed rates will threaten Stage 5's ability to deliver.
 - Key stake holders in submission to the Contributions Plan (2020) warn that the proposed rate will result in development and house prices in West Dapto being uncompetitive and will exclude low and moderate income earners, and called for a peer review of the plan.
 - WCC (24/06/2019) noted ***'Council will need to closely monitor the risk of development feasibility being impacted by the higher contributions.'***

Taking these points into consideration, Council should look to identify where savings can be made through updated design and costing.

We therefore request that IPART broaden recommendation 24 to include an additional recommendation that the proposed infrastructure in the West Dapto Contributions Plan be either peer reviewed or reviewed by an independent engineering firm in order to identify potential savings to be achieved from a more considered design.

We ask that this review be undertaken within two years.

This would allow the Plan to be revised before construction of some of the infrastructure in the plan commences and ahead of the recommended 3 year review.

We thank IPART for the opportunity to comment on the Draft Assessment Report.

David and Judith Ball