28 June 2019



Matthew Edgerton Executive Director Water and Local Government IPART

By online submission

Dear Mr Edgerton,

RE: Draft Assessment of Vineyard Contribution Plan

The Urban Development Institute of Australia (UDIA) NSW is the leading industry body representing the interests of the urban development sector and has over 500 member companies in NSW. UDIA NSW advocates for better planning, timely and affordable housing, and the building of vibrant communities to increase local job opportunities.

UDIA welcomes the introduction of the consultation process at the draft report stage, we believe this will enable the industry to participate more fully in the plan making process. We also encourage local government to commence plan preparation earlier, and alongside rezoning to accelerate the planning process.

The IPART-adjusted contribution ranges between \$42,827-\$55,436 per lot depending on the type of residential development. This represents a 20% decrease in the contribution rates that were initially proposed by the Council. We notice this plan has much lower contributions than neighbouring plans in Blacktown and seek to see if there are learnings from this more efficient plan that could be spread to other areas. UDIA makes the following comments about the plan:

Open Space Land with Existing Native Vegetation

UDIA NSW questions funding the embellishment of open space land where existing native vegetation occurs through a contribution plan, we believe that this might be better funded through an OEH funding process. We recommend the Tribunal makes a policy recommendation for a funding mechanism for native vegetation be protected.

Low Cost Loans

Without seeing the detail of the costing of the plan we raise concern about the loan interest costs. We note that the NSW Government's Low Cost Loan Initiative is being used to assist with the forward funding delivery of development for works, for works that are forward funded we are concerned about the possible 'double dipping' that could occur if the funding is provided through the loan and then they are also indexed.

Full Width Upgrades of Other Collector Roads

We note IPART has recommended increasing the cost of Collector Roads in the plan by \$2.1 million, which would translate to approximately \$2,500 additional contributions per lot. UDIA believes IPART should not recommend increased costs, when council estimates that

Urban Development Institute of Australia NEW SOUTH WALES PO Box Q402, QVB Post Office NSW 1230 Level 5, 56 Clarence Street Sydney NSW 2000 e udia@udiansw.com.au t www.udiansw.com.au abn 43 001 172 363 the likely delivery of the road will be substantially reduced. UDIA recommends the council estimate of \$3,768 per metre is retained.

Contingency Rates

UDIA endorses the recommendation of reducing the contingency rates for roads from 20% to 10% in line with the advice from WTP.

If you have any queries, please do not hesitate to contact Elliott Hale, General Manager Policy, Media and Government Relations on (02)

Yours sincerely

Steve Mann Chief Executive