18 February 2018

Scott Perugini Kelly
Department of Planning and Environment
PO Box 39
SYDNEY NSW 2001

Dear Scott,

**PIA Input: Local Development Contributions Practice Note Revision**

The Planning Institute of Australia (PIA) appreciates the opportunity to comment on the revision of the Local Development Contributions Practice Note 2014. PIA supports the proposed revision of the Practice Note and urges further integrated reform of the infrastructure funding regime in NSW.

Our comments are informed by a PIA member workshop and consideration of the reforms by planning practitioners experienced in using the existing guidelines. The matters we have highlighted in Attachment A are:

- Early and integrated delivery of contributions plans to ensure rezoning / DCPs and DAs occur once contributions obligations are known
- The rigidity of the IPART assessment process can deliver outcomes that are not practical and not well matched to future community infrastructure needs.
- The essential works list performs much better for greenfield situations – urban renewal areas and regional areas require a more nuanced approach to meeting community needs and the cost of land means more creative attention to embellishment is needed.
- The essential works list should be retained to provide some benchmark and certainty.
- There is a need for further reform to get the most from land able to be acquired – this means guidance on multiple uses of facilities, drainage areas, buildings and a wide range of embellishment opportunities. This can also assist in improving affordability.
- The opportunity for contributions plans to acquire stratum for new community facilities (eg libraries in other commercial buildings) is also important.
- There is a perverse incentive to pursue VPAs due to complexity and time taken to achieve a successful s94 Contributions plan for an amount above the cap (noting that cap still exists in the absence of a submission to IPART).
- Greater flexibility to amend contributions plans is needed to reduce delay and ensure better local outcomes are achieved.

The most significant point raised by PIA representatives is that contributions plan infrastructure funding obligations (local and state) be known prior to the approval of rezonings and any development applications being submitted. This means a revision of the process of land release to better integrate the infrastructure planning and funding regime up front. This would streamline land supply by improving certainty and reducing the
development risk linked to delay. PIA has consistently advocated for more holistic reform in this regard in earlier submissions on the EP&A Act.

PIA would be pleased to meet with the Department to outline any aspect of our input and more our more general comments on infrastructure funding set out in earlier submissions (see Attachment B). Please contact myself or John Brockhoff on 0400953025.

Yours sincerely,

Jenny Rudolph
President PIA NSW

cc. Alison Frame
A.1 Introduction and Background

A.1.1 PIA Response

The Department of Planning and Environment (DPE) has requested industry comment as part of a review of the 2014 Local Development Contributions Practice Note. This practice note was repealed and replaced by a new practice note called Local Infrastructure Contributions Practice Note January 2018. The new practice note updates the 2014 IPART practice note to reflect the content of a Minister’s Direction made in July 2017.

The comments from PIA refer to both the repealed 2014 and new 2018 IPART practice notes. DPE has specifically asked for comments in relation to the Contributions Plan assessment process and essential works list (addressed in below).

A.1.2 Changes between the 2014 and 2018 IPART Practice Notes

The 2018 practice note ostensibly updates the Secretary’s guidance on IPART-reviewed draft contributions plans so that the guidance aligns the contents of the Minister’s 2017 Direction regarding the phase-out of the LIGS. However, there are some changes that go beyond this.

The 2014 practice note provided that some amending contributions plans that had already been reviewed by IPART would not need to be re-reviewed by IPART. Such plans needed to meet the criteria shown on page 5:

- the scope of works remains the same or is reduced; and
- the geographical catchment of the plan remains the same or is reduced; and
- the cost estimates of the works either remain the same or are reduced or changed to actual costs; and
- the method of apportionment of costs remains the same; and
- the development yield or population projections are refined as development patterns become better defined.

The 2018 practice note however removes this explicit allowance and implies that all amending contributions plans that have rates above the cap are to be reviewed by IPART:

Council should submit the draft contributions plan to IPART for review as either:

- a new contributions plan
- a new contributions plan that seeks to amend an existing contributions plan consistent with clause 32 of the EP&A Regulation. (Page 11)

The 2014 practice note allowances for reviewed plans should be reinstated because it avoids the need for unnecessary further review of plans and resultant delays in adopting contributions plans. We acknowledge that this may result in some local government areas having higher levies, but in this interim phase it also provides certainty.

There are other omissions in the 2018 practice note, i.e.:

- The section on ‘key principles underlying development contributions’ (section 2.2), which briefly discusses the concepts of reasonableness and apportionment, has been

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1 This practice note’s full title is Revised Local Development Contributions Practice Note for the assessment of Local Contributions Plans by IPART February 2014. It is referred to as the IPART practice notes.
removed. Presumably this has been done because it doubles-up on the guidance on these matters provided in the 2005 practice notes.

- In section 2.3.2 of the 2014 practice note it stated that the Minister ‘retains discretion to refer contributions plans that are below the relevant cap to IPART for review’. The Minister has never referred such a plan to IPART, and presumably will have no interest in doing so in the future.

A.1.3 Application of the Practice Note to Greenfield and Urban Renewal Areas

There is broad agreement among practitioners consulted by PIA, that the contribution plan assessment process and essential infrastructure list is workable in greenfield areas when undertaken by a well-resourced council and a major and experienced developer. There remain areas for improvement around the length of the assessment process, better tailoring of planning outcomes, dual use of facilities and the minimisation of land acquisition costs.

However, in urban renewal situations the process is much less functional. In urban renewal areas there are fewer incentives to engage in the IPART process to exceed the cap. PIA supports opportunities to tailor contribution plans with local differences which respond to specific needs of distinct urban renewal areas.

A.2 Contribution Plan Assessment Process

A.2.1 Overview

The most significant issue is the unacceptable delays for preparing and finalising developer contributions for a new urban development area. The development contribution plan process is not sufficiently integrated with the rezoning / planning proposal process.

The first stage of assessment of plans by IPART is undertaken by economists outside of the planning context in which development occurs. It is driven by item cost minimisation, while the practicality of outcomes in a social context is outside scope. This can lead to infrastructure outcomes that are not suited to the setting and/or a call for increasingly fine-grained guidance which is resource intensive for the DPE.

The second stage of the ‘assessment process’ involves consideration of the IPART assessment by the Minister. This, as experienced by some, creates an unknown timeframe or outcome.

The IPART assessment process is complex, lengthy (typically > 6 mths – as well as some months for consideration by the Minister) and adds to the financial risk associated with council provision of infrastructure – many councils will sacrifice income by opting for a contribution rate that is at or below the cap to avoid having to subject their plan to IPART. This also creates a perverse incentive for councils to pursue a planning agreement in lieu of a contributions plan. In addition, developers may prefer to have a stronger role in devising and costing an orderly set of infrastructure works (via a VPA) that may be more fit for purpose than that which arises under a s94 Plan. In some circumstances, pursuing a complex VPA might have less delay than pursuing the IPART assessment process for new or revised contributions plan that exceeds the cap. PIA believes that there needs to be more of an incentive for s94 plans to be practical and flexible so that they are the default method and offer the necessary transparency.

Practitioners have also observed that many of the savings intended to be made through the IPART assessment process could also be achieved through the provision of greater guidance on controlling the central costs associated with project provision eg contingencies, project
management costs, design and on-costs as well as significantly more attention to the control of land acquisition costs (see below).

A.2.2 Strict plan approval timelines (Sequencing and Timing?)

The development contributions for a new development area need to be confirmed sooner. It currently takes too long for the developer contributions for a new urban development area to be known because the section 94 plan process does not align at all with the rezoning process.

Councils do not want to issue consents for new development until a section 94 contributions plan is in place. Currently, section 94 contributions plans take up to 2 years or more to be finally approved after IPART and the Department have reviewed them, or the Minister has made a determination. Until recently, approval delays have been able to be reduced by the developer entering into a VPA with the council to pay the $30,000 per lot capped rate, or other appropriate rates. Councils have been willing to enter these agreements because the State Government has guaranteed funding of the gap above the cap.

However, the Government is phasing out this commitment by 2020. There is now no State Government guarantee for funding above the cap. The removal of the gap guarantee means that councils will not determine DAs until a full-rate contributions plan is in place - a process that currently takes years not months.

The 5 steps to achieving an ‘IPART reviewed contributions plan’ are described in the Minister’s July 2017 Direction and in the 2018 practice note. The Government needs to establish and enforce strict timing protocols for these 5 steps so that development approvals in the newly rezoned areas are not delayed.

The following is a suggested timing schedule:

- A council/DPE must exhibit its draft s94 plan for a Priority Growth Area / Planned Precinct within 3 months of the commencement of the public exhibition of a draft indicative layout plan / rezoning plan.
- A council must forward its plan, together with any public submissions, to IPART for review within 3 months of the start of this exhibition.
- IPART issues its review report within 6 months of a complete application being lodged by the council, or by the rezoning gazettal date, whichever is sooner. Any adjustments to the s94 plan required because of changes made to the indicative layout plan / zoning plan after the exhibition can be made during this time.
- The Department reviews IPART’s report, reports to the Minister on the essential works contribution rate, and the Minister (or his delegate) advises the Council on the essential works rate to be imposed on development no more than 3 months after IPART issued its report.

Following the above timing schedule should avoid inadequate, stop-gap solutions such as developers entering into VPAs to pay the full, but not yet verified, essential works contributions rate.

The most significant point raised by PIA representatives is that contributions plan infrastructure funding obligations (local and state) be known prior to the gazettal of the rezoning and any development applications being submitted. This means a revision of the process or simultaneous process of land release to better integrate the infrastructure planning and funding regime up front. This would streamline land supply by improving certainty and reducing the development risk linked to delay. PIA has consistently advocated for more holistic reform in this regard in earlier submissions on the EP&A Act.
In summary, PIA support:

- S94 contributions plans (or the basis of a VPA) being available at the point of rezoning.
- A planning proposal should only be considered alongside a contributions plan.
- Land release announcements should follow rezoning - for greenfield, urban renewal planned precincts and in relation to the local gateway process.
- The same conceptual process should apply for State Planned Precincts.

Councils should not be able to accept a DA without certainty on the contributions obligations for local contributions, SIC and affordable housing.

**A.2.3 Guidance for councils seeking approval for the new $30,000 cap to apply to greenfield areas**

Neither the 2014 or 2018 practice note provides specific information on how a council seeks Ministerial approval for a newly rezoned greenfield area to be subject to the higher $30,000 cap.

In the past the practice has been that councils have sent a written request to DPE, and DPE has considered that request and, if agreed, the greenfield area has been added to the list included in Schedule 2 of the Minister’s caps direction through an amending direction.

The DPE / Minister has tended to wait until a number of approved requests have been processed before issuing an amending direction. This in some cases has resulted in significant delays to the declaration of higher caps for legitimate greenfield areas.

PIA suggests that this matter could be addressed by the Minister immediately issuing an amending direction that applies the $30,000 cap to any area that is shown in any LEP as an ‘Urban Release Area’.

**A.3 Essential Works List**

**A.3.1 Opportunity for local variations to essential works to achieve planning outcomes**

Section 94 plans should express local community differences, needs and specific local outcomes sought.

Flexibility is sought for changing the s94 essential list in response to demonstrated local need and the achievement of adopted planning outcomes. The list should not be prescriptive – especially in urban renewal situations. There should be a flexibility clause in the guidelines subject to criteria met. Cost certainty could be maintained by having alternative infrastructure benchmarked against standard infrastructure costs from a prescriptive list.

Consistency across LGAs can still be achieved by consistent presentation and benchmarking of costs included.

**A.3.2 Relevance to greenfield vs urban renewal / regional vs urban areas**

The current essential works list generally works well for greenfield areas, but not for urban renewal areas (only 1 assessed by IPART to date). There should be separate lists of works for greenfield and renewal areas.
For renewal areas DPE should, for example, consider removing drainage facilities from the essential works list because any drainage issues are likely to be pre-existing, but include some types of community buildings and public domain areas that function as open space as these are fundamental to community wellbeing in an urban environment.

There should be some further clarity around what ‘land for community services’ means. The practice note should be clear in saying that, for urban renewal areas, this includes land in stratum in a building.

**A.3.3 Essential Infrastructure Items Included**
The list and comments below can be assessed per LGA and whether they are regional or a greenfield or renewal area. It is acknowledged that not every S94 Plan may have everything due to cost, however the essential items in the particular LGA should be allowed/proposed to be proposed/included.

**Open Space**

<table>
<thead>
<tr>
<th>Infrastructure description</th>
<th>Recommendation (Keep, Change, Add, Remove)</th>
<th>Comments (Reason for recommendation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Embellishment of existing facilities (beyond basic)</td>
<td>Add</td>
<td>Addresses need with flexibility, especially in urban renewal areas (including synthetic surfaces and asphalt as noted in Practice Note)</td>
</tr>
<tr>
<td>Skate Parks and BMX tracks</td>
<td>Add</td>
<td>Essential infrastructure for recreation should not discriminate by age (nb playgrounds included) – skateparks and BMX tracks can be important facilities for youths.</td>
</tr>
<tr>
<td>Public domain embellishment (with a specific definition)</td>
<td>Add</td>
<td>Community expectation that public domain will be embellished and include trees / canopy / shade (refer Government Architect guidance) – and powerlines underground. Quality public domain embellishment (including landscaping) is ‘essential’ in high intensity renewal areas</td>
</tr>
<tr>
<td>Public art elements (as a subset of public domain improvements)</td>
<td>Add</td>
<td>Considered important social infrastructure in highly urbanised situations where extensive land is not available – makes a significant contribution to amenity in renewal areas.</td>
</tr>
<tr>
<td>Bushland embellishment and integrated environmental works</td>
<td>Add</td>
<td>Embellishment of open space quality – intrinsic to recreational use and value as open space – not possible to separate.</td>
</tr>
<tr>
<td>Riparian land embellishment</td>
<td>Add</td>
<td>Need to promote integrated use – not possible to separate primary water function from secondary value as open space.</td>
</tr>
<tr>
<td>Embellishment of OS for 24 hour use</td>
<td>Add</td>
<td>Increased use pressure and needs of users changing especially in inner city – need comprehensive analysis of OS/recreational needs not paper accounting of land required.</td>
</tr>
</tbody>
</table>
**Community Services**

Land for community services are considered essential works. For the purpose of the practice note ‘community services’ means a building or place: owned or controlled by a public authority or non-profit community organisation, and used for the physical, social, cultural or intellectual development or welfare of the community, but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation. Examples of community service places or buildings include community halls, libraries, neighbourhood centres, youth centres, aged persons facilities, childcare facilities, public art gallery or performing arts centres.

<table>
<thead>
<tr>
<th>Infrastructure description (insert description of existing or proposed essential infrastructure works)</th>
<th>Recommendation (Keep, Change, Add, Remove)</th>
<th>Comments (Reason for recommendation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stratum value of land for a community facility</td>
<td>Add</td>
<td>Flexibility to deliver facilities within another building – especially important in inner urban renewal areas (e.g., library in a strata building)</td>
</tr>
<tr>
<td>Childcare facilities</td>
<td>Note*</td>
<td>*Subject to local provision by council – but not necessary where councils do not provide this service. The private sector is getting into this land use.</td>
</tr>
<tr>
<td>Multi-purpose facility / community resources hub</td>
<td>Add</td>
<td>Flexibility to provide more services with available funds on small site (see Ponds VPA). Flexibility for type of amenity to change over time – embellishment of existing asset to respond to changing needs (e.g., youth to aged services)</td>
</tr>
<tr>
<td>Aquatic recreation / gym</td>
<td>Add</td>
<td>A highly sought-after amenity – especially in inner urban areas where land is at premium (flexibility to combine with recreation / OS uses). Gym is normally a private sector use.</td>
</tr>
<tr>
<td>Surf Clubs</td>
<td>Add</td>
<td>An example of an area specific need – especially important re toilets / change rooms – this could be a local issue.</td>
</tr>
<tr>
<td>Embellishment of community facilities to a base standard (including fit out)</td>
<td>Add</td>
<td>Build in an ability to embellish to a higher standard as opportunity arises (e.g., availability of a VPA). Need incentive for flexible uses and more economic than land acquisition, especially in renewal areas</td>
</tr>
<tr>
<td>All community facility buildings</td>
<td>Add</td>
<td>Ensure there is no definitional reason for exclusion of needed building. A key restriction imposed by the essential works list is to remove the ability to levy contributions for the construction of community facilities.</td>
</tr>
<tr>
<td>Different list of facilities in regional / remote and urban situations</td>
<td>Note</td>
<td>Needs will vary / land costs as well – flexibility appropriate.</td>
</tr>
</tbody>
</table>

**Transport**

Land and facilities for transport (for example, road works, traffic management and pedestrian and cyclist facilities) are considered essential infrastructure, but not including carparking.

<table>
<thead>
<tr>
<th>Infrastructure description (insert description of existing or proposed essential infrastructure works)</th>
<th>Recommendation (Keep, Change, Add, Remove)</th>
<th>Comments (Reason for recommendation)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hierarchy of roads</td>
<td>Change</td>
<td>Land en globo rates – not retail rates for land acquisition for roads</td>
</tr>
<tr>
<td>--------------------</td>
<td>--------</td>
<td>---------------------------------------------------------------------</td>
</tr>
<tr>
<td>Half road widths around facilities</td>
<td>Change</td>
<td>Recognises share of value between public and private good.</td>
</tr>
<tr>
<td>Bus Stops (clarification)</td>
<td>Change</td>
<td>Clearer definition of what is classified as transport vs infrastructure.</td>
</tr>
<tr>
<td>Footpaths</td>
<td>Add</td>
<td>Clarify that should always be included – currently informed by other agreements – shelter.</td>
</tr>
<tr>
<td>Through site links</td>
<td>Add</td>
<td>Currently left out.</td>
</tr>
<tr>
<td>Shared car parking off site</td>
<td></td>
<td>Important for managing car storage cost effectively.</td>
</tr>
</tbody>
</table>

**Stormwater**

**Stormwater**

*Land and facilities for stormwater management* are considered essential infrastructure.

<table>
<thead>
<tr>
<th>Infrastructure description</th>
<th>Recommendation</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>(insert description of existing or proposed essential infrastructure works)</td>
<td>(Keep, Change, Add, Remove)</td>
<td>(Reason for recommendation)</td>
</tr>
<tr>
<td>Stormwater facilities that serve a detention and treatment purpose</td>
<td>Add</td>
<td>Not in current list</td>
</tr>
<tr>
<td>Riparian land</td>
<td>Add</td>
<td>Need to promote integrated use – not possible to separate primary water function from secondary value as open space.</td>
</tr>
</tbody>
</table>

**A.4 Further Comments: Flexibility, Land Costs, Holistic Reform**

**A.4.1 More flexibility in contributions plans**

*Lack of flexibility for councils in applying their own contributions plans*

A council may only impose a condition requiring a section 94 or 94A condition if it is of a kind allowed by and is determined in accordance with the contributions plan subject to any direction of the Minister: section 94B(1). This provides a council with no flexibility to depart from its own contributions plan unless the flexibility is built into the section 94 contributions plan.

However, if the consent authority is not a council, e.g. the Court, it may impose a condition under section 94 or 94A, even though it is not authorised or of a kind allowed by, or is not determined in accordance with a contributions plan: section 94B(2)(a). In that case, the Court only has to have regard to the contributions plan before imposing any condition: section 94B(2)(b).

The Court may disallow a condition under section 94 that is of a kind allowed by a contributions plan because it is unreasonable in the particular circumstances of that case even if it was determined in accordance with the relevant contributions plan (section 94B(3)).

Understandably for probity and transparency reasons councils have not been given these powers, but there would be a better way in terms of timing and cost other than for a
developer lodging an appeal to have the Court determine the issue (e.g. referral/review by IPART at the first instance, without losing appeal rights—similar to a section 82A review). DPE is urged to consider options to address this issue.

The complexity of drafting a contributions plan highlights the need for further training on contributions plan drafting—especially ways to improve the flexibility of drafting allowable under the current regime.

Amendment of a Section 94 contributions plan

Councils are required to review their plans, but the process of updating them is slow because of the need to prepare another plan to amend the existing contributions plan.

A contributions plan can only be amended by the making of a subsequent contributions plan which must be publicly exhibited etc. This takes time.

Only very minor amendments may be made to a contributions plan without the need for a new plan, including fixing typos and changes to the rates of section 94 monetary contributions set out in the plan to reflect quarterly or annual variations (see clause 32(3) of the Environmental Planning and Assessment Regulation 2000).

Understandably, developers would not want councils to be able to readily amend contributions plan without public notification of the proposed amendment because of the lack of certainty. However, a better balance needs to be struck.

IPART does not see submission inputs from other parties (only council) – and practitioners argue that local submissions can delay the IPART process. Some councils send a brief submission summary to IPART. This is considered good practice to enable IPART to focus on the broader assessment.

The Minister has wide powers under section 94EAA to direct a Council to amend or repeal a contributions plan (section 94EAA(1)). The Minister for Planning also could use his power to amend a contributions plan and in amending such a plan, the Minister is not subject to the EP&A Regulation (section 94EAA(2) and (3)). That is, the Minister does not need to publicly notify an amendment. This presents an opportunity for DPE to consider for widening the range of amendments able to be progressed without time consuming re-exhibition—in circumstances where amendments are not major.

PIA members have also observed delays in IPART assessment of plan amendments where IPART feel obliged to review a Contributions Plan in its entirety rather than only assessing the specific amendment.

Section 94E directions by the Minister

This section is not frequently utilised by the Minister. There are very few site specific or development specific directions. The use of a direction by the Minister for a specific contributions plan or a contribution for a particular development would provide flexibility but the Minister has been loath to use this power.

The impacts of the lack of flexibility of councils applying of the contributions plan and the lack of certainty drives developers into planning agreements, where as there is still uncertainty as to what developers will be up for.

Exemptions
Although exemptions exist in most contributions plans and they vary from council to council. Councils rarely exercise their discretion to grant an exemption. Given the reluctance, it may be more appropriate to make it mandatory that the exemption apply - if the exemption criteria are satisfied. DPE are urged to explore this opportunity and consider that this could be achieved by the Minister issuing a section 94E direction to that effect.

_Councils should be able to make submission to increase s94A levy_

Ministerial approval is required for any s94A contribution rate increase over the 1% current maximum. This percentage level has not changed since introduction and is a very ineffective approximation of need. Councils should be in a position to make a submission to IPART to levy above the 1% cap where there is demonstrated need.

**A.4.2 Stronger focus on reducing land acquisition costs**

*Land acquisition is the critical cost component*

The majority of costs of infrastructure provision are associated with land acquisition and the current Practice Note does not adequately address this. As land prices increase so will contribution rates – this is not currently being factored into the capping of contributions.

There is a greater expectation that developers will be compensated fully for the ‘loss’ of land to infrastructure where previously it may have been dedicated free of charge. There is anecdotal evidence that the need to allow for land to be provided for infrastructure to serve the development is not being adequately factored into due diligence investigations.

The land valuation is typically based on highest and best use and is subject to the Land Acquisition (Just Terms Compensation) Act which is all contributing to higher contribution rates.

A focus on reducing land acquisition costs would be more effective in reducing contribution rates and improving housing affordability. A wider review should include:

- Review of the implications of legislation such as the Land Acquisition (Just Terms Compensation Act)
- Provision of better guidance on the costing of land acquisitions
- Expectation management
- Methods of reducing the amount of land required (eg dual use / the more efficient use of urban land for public infrastructure – see below)

*More efficient use of urban land for public infrastructure*

A Minister’s direction or new / updated s94 practice note should be issued to contain infrastructure costs and enable more efficient use of urban land for public infrastructure, through the following:

- Works schedules can be informed by the Department preparing facility benchmarks for facilities such as playing fields, playgrounds, sports courts, community centres and the like.
- Encourage / require councils to accept suitable land below the 1 in 100 year flood level for active recreation purposes, and to align the passive open space network with riparian corridors wherever possible. There are great efficiencies to be achieved for such lower cost land to be used for active and passive recreation purposes, instead of expensive developable land. Further guidance is needed for multifunctional use of detention basins and waterways.
• Minimise / avoid the use of temporary drainage basins by requiring councils to assign highest priority in spending their s94 funds on acquiring drainage land, or rethinking how trunk drainage schemes are delivered (e.g. greater use of permanent on-site basins on agglomerated development sites).

A.4.3 Need for more holistic infrastructure funding reform

Financial pressures on local government have been increased through variety of factors including cost-shifting by higher levels of government, increased regulatory requirements and rate-pegging. There is still, however, an expectation that a council will provide infrastructure as required and to a higher standard than was previously expected. In response they are passing more costs on to others including developers. There is a pressing need for holistic reform of infrastructure planning and funding as outlined in PIA submissions on the Greater Sydney Region Plan and planning reform.

There should be comprehensive infrastructure funding and delivery plans for identified growth or renewal areas. The plan should be underpinned by a funding mix, with the respective roles /shares to be provided by contributions, value sharing/betterment, special rates, grants, other taxes and charges. A comprehensive approach would see State and local infrastructure contributions and infrastructure schedules in the one plan for a growth area. PIA would not exclude the opportunity for a broad based regional property levy.

Contributions obligations need to be made known as a package at the very time growth area structure plans are released for comment. Local, state infrastructure and also any affordable housing contribution imposts need to be known up front to be effective. Levels of State and local contributions and any value sharing arrangements must be made public at the same time as structure plans for a growth area are publicly released. The charges should be predictable for land purchasers so that the full fair share of any value uplift created by subsequent rezonings is returned to the new community through infrastructure upgrades.