



IPART Independent
Pricing and Regulatory
Tribunal | NSW

Assessment of Contributions Plan West Dapto Development Contributions Plan 2024

Wollongong City Council

Draft Report

August 2024

Local Government >>

Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Local Government Committee Members

The Local Government Committee members for this review are:

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Invitation for submissions

IPART invites comment on this document and encourages all interested parties to provide submissions addressing the matters discussed.

Submissions are due by **Friday, 18 October 2024**

We prefer to receive them electronically via our [online submission form](#).

You can also send comments by mail to:

Assessment of West Dapto Development Contributions Plan 2024
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop, Sydney NSW 1240

If you require assistance to make a submission (for example, if you would like to make a verbal submission) please contact one of the staff members listed above.

Late submissions may not be accepted at the discretion of the Committee. Our normal practice is to make submissions publicly available on our [website](#) as soon as possible after the closing date for submissions. If you wish to view copies of submissions but do not have access to the website, you can make alternative arrangements by telephoning one of the staff members listed above.

We may decide not to publish a submission, for example, if we consider it contains offensive or potentially defamatory information. We generally do not publish sensitive information. If your submission contains information that you do not wish to be publicly disclosed, please let us know when you make the submission. However, it could be disclosed under the *Government Information (Public Access) Act 2009* (NSW) or the *Independent Pricing and Regulatory Tribunal Act 1992* (NSW), or where otherwise required by law.

If you would like further information on making a submission, IPART's [submission policy](#) is available on our website.

The Independent Pricing and Regulatory Tribunal

IPART's independence is underpinned by an Act of Parliament. Further information on IPART can be obtained from [IPART's website](#).

Contents

1	Executive Summary	1
1.1	IPART's Role	1
1.2	West Dapto Development Contributions Plan 2024	1
1.3	Our Assessment of the WD CP	2
1.4	What we found	2
1.5	Draft recommendations	3
1.6	We want to hear from you	4
2	The West Dapto Development Contributions Plan 2024	5
2.1	The West Dapto Urban Release Area development	5
2.2	Contributions Plan – West Dapto 2024	6
2.3	Items included in the WD CP	6
3	Assessment of West Dapto Contributions Plan (2024)	9
3.1	Overview	9
3.2	Essential Works List	9
3.3	Nexus	11
3.4	Reasonable Cost	13
3.5	Timing	23
3.6	Community Liaison and Publicity	24
3.7	Any other Matters	24

1 Executive Summary

New development is essential to provide housing for NSW's growing population and more commercial, retail, and industrial space for employment. When development occurs, local councils need to provide additional infrastructure to support both the development and the new community– for example, new roads, stormwater management and open spaces. In NSW, councils can require developers to contribute to the cost of providing that infrastructure.

1.1 IPART's Role

Contributions plans set out the local infrastructure required to meet the demand from new development, and the contributions a council can levy on developers to fund the necessary land and works.^a Currently, a contributions plan that proposes a level of contributions above a threshold of \$30,000 per lot or dwelling in identified greenfield areas and \$20,000 per dwelling in other areas must be submitted to IPART for review.

IPART provides its assessment to the Minister for Planning and Public Spaces about whether the plan complies with the essential works list and other criteria set out in the Infrastructure Contributions Practice Note ([2019 Practice Note](#)) published by the Department of Planning, Housing and Infrastructure (DPHI).^b The 2019 Practice Note must be read in conjunction with the Department of Planning and Environment's Development Contributions Practice Notes, July 2005 ([2005 Practice Notes](#)) which outline the requirements for local councils in preparing and administering their contributions plans.

1.2 West Dapto Development Contributions Plan 2024

Wollongong City Council (the council) submitted *West Dapto Development Contributions Plan 2024* (WD CP) to IPART for assessment on 15 April 2024. The council is seeking to levy development contributions above the applicable \$30,000 cap per lot/dwelling. This is the third time that IPART is reviewing the WD CP.

^a [Section 7.11 of the Environment Planning and Assessment Act 1979](#) allows councils to levy contributions towards the cost of providing local infrastructure.

^b The Department of Planning, Housing and Infrastructure (DPHI), formerly Department of Planning and Environment (DPE). This change took place on 1 January 2024, and this report will refer to DPE/DPHI interchangeably.

1.3 Our Assessment of the WD CP

IPART must review the WD CP and provide its assessment to the Minister for Planning and Public Spaces (Minister). The Minister (or the Minister's nominee) may require the council to make changes to the plan. After the council makes any changes and adopts the plan, the council can levy the contributions rate above the cap, as calculated under the adopted plan.

We assessed the WD CP against the DPHI's 2019 [Practice Note](#) criteria:

1. Public amenities and services in the plan are on the **essential works list** as identified within the Practice Note.
2. Public amenities and services are reasonable in terms of **nexus** (i.e. there is a connection between the development and demand created).
3. Development contribution is based on a **reasonable estimate of the cost** of the public amenities and services.
4. Public amenities and services can be provided within a **reasonable timeframe**.
5. Development contribution is based on a **reasonable apportionment** between:
 - a. existing and new demand for the public amenities and services, and
 - b. different types of development that generate new demand for the public amenities and services (e.g. different types of residential development such as detached dwellings and multi-unit dwellings, and different land uses such as residential, commercial, and industrial).
6. Council has conducted appropriate **community liaison** and publicity in preparing the contributions plan.
7. **Other matters** IPART considers relevant.¹

Our assessment of the WD CP involved reviewing the contributions plan and supporting documentation supplied by the council, including the council's application form, the works schedule, strategic studies, and consultant reports.

We also made several requests for further information from the council and conducted a visit to the council and the development site to assist us in assessing the plan.

For more details on our assessment approach, please see our [Information Paper](#).

The remaining sections of this Draft Report provide a background of the WD CP, our assessment of the plan, draft recommendations and draft recommended contributions rates.

1.4 What we found

We found that the plan meets most of the 2019 Practice Note criteria (see Figure 1.1).

Figure 1.1 Summary of our assessment of the WD CP

Essential Works List	Nexus	Reasonable Cost	Reasonable apportionment	Reasonable timeframe	Community consultation	Other matters
						
Demonstrated	Demonstrated	Demonstrated subject to recommendation	Demonstrated	Demonstrated	Demonstrated	Demonstrated

We have made draft recommendations where the WD CP has not completely met the criteria, although this has not resulted in any adjustments to the costs in the work schedule.

1.5 Draft recommendations

Recommendations

- | | | |
|----|--|----|
| 1. | Ensure that any necessary changes are made to the scope of infrastructure in the WD CP on the basis of the Stormwater Masterplan prior to the council's next submission to IPART in 3 years' time. | 11 |
| 2. | Ensure that any necessary changes are made to the cost of works in the CP on the basis of the Stormwater Masterplan prior to the council's next submission to IPART in 3 years' time. | 14 |
| 3. | The council should review transport works costs and make adjustments for any grant funding received following the adoption of the plan. | 17 |
| 4. | The council should review open space works costs and make adjustments for any grant funding received following the adoption of the plan. | 19 |
| 5. | The council should review costs and make adjustments for any other grant funding received for costs not related to transport and open space works following the adoption of the plan. | 19 |
| 6. | The council should review the inclusion of a land acquisition allowance for the purposes of land acquisition under the Land Acquisition (Just Terms Compensation) Act 1991. | 21 |
| 7. | The council should review the inclusion of costs associated with the processes of acquiring land. | 21 |
| 8. | The council should provide documentation and quantitative information regarding the amount of open space being provided by developers in its next submission to IPART in three years' time. | 25 |

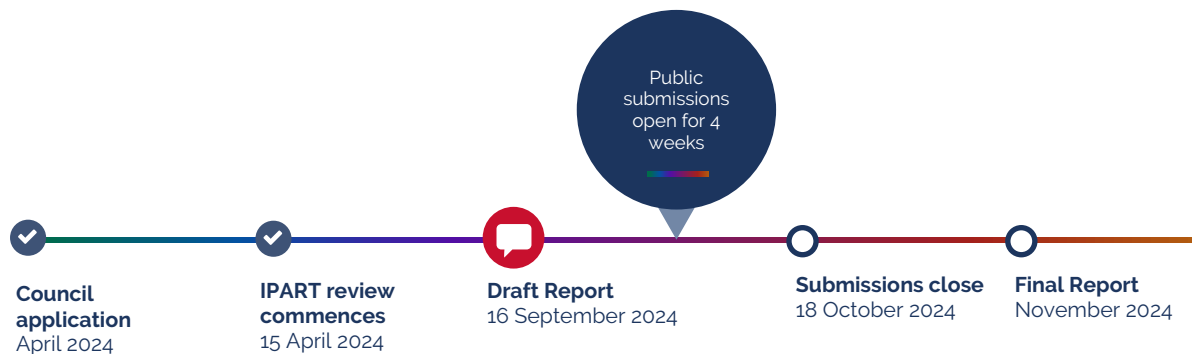
After implementing our draft recommendations, we consider that the total reasonable cost of works and land in the WD CP will be about **\$1.55 billion**. The corresponding estimated development contribution rate for a typical dwelling would be about **\$80,500**.

1.6 We want to hear from you

We are seeking feedback on our draft report and recommendations listed above until 18 October 2024.

We will consider all the feedback we receive as well as the results of our analysis in forming our final recommendations. We expect to provide our final recommendations to the Minister in November 2024.

Figure 1.2 Review timeline for WD CP



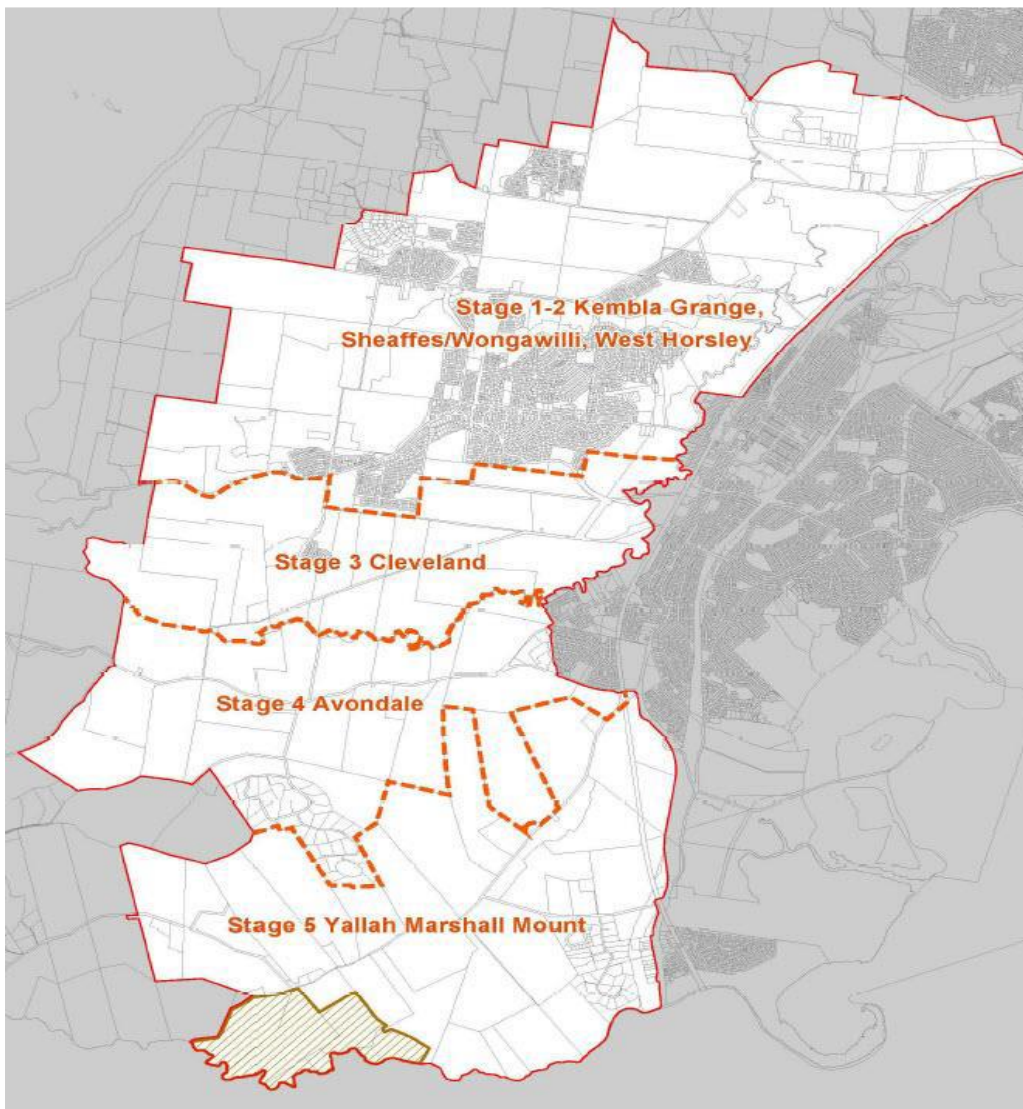
2 The West Dapto Development Contributions Plan 2024

2.1 The West Dapto Urban Release Area development

The WD CP covers the West Dapto Urban Release Area (WDURA), within the Wollongong local government area and has a net developable area (NDA) of 1722.1.² The total area of the WDURA covers approximately 4,700 hectares.³

The precinct is bounded by Dombarton and Farmborough Heights to the North, Albion Park and Calderwood to the South and Dapto and the M1 Motorway to the East. The plan covers six suburbs. Although development has proceeded predominantly in the North, the stages are largely a point of reference for each area in the works schedule and CP (see Figure 2.1).⁴

Figure 2.1 Map of West Dapto Urban Release Area



Source: Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 7.

The precinct was formerly mainly a rural and rural residential environment. Stage 1,2,3 and 5 of the plan have been zoned for urban development to include residences and neighbourhood centres, commercial and industrial space.⁵ The land in the plan is subject to rezoning for various uses to support its incoming population, including residential, retail/mixed use, commercial/industrial, traffic, transport, stormwater management, recreation and open space purposes.

Prior to development, the WDURA had a population of around 7,000 people in 2,300 homes. Up to 20,000 new dwellings are expected to support an additional 59,000 people by 2062. Since 2022, 6,000 additional residents in 2,000 new dwellings have been delivered in the WDURA.

Residential development is estimated to comprise 1,452 hectares of total net developable area.⁶ The remaining land is divided between 248 hectares zoned for industrial land and 22 hectares zoned for commercial. This includes plans for significant light industry as well as retail, business and community use floorspace. The council expects development to span until approximately 2060.⁷

2.2 Contributions Plan – West Dapto 2024

To support development in the precinct, the plan levies contributions for traffic and transport facilities, stormwater management infrastructure and open space and recreation facilities.

The plan was submitted to IPART for review on 15 April 2024. The council has indicated its intention to adopt the plan after receipt of the Minister's advice following IPART's assessment.

2.3 Items included in the WD CP

The WD CP includes total development contributions of about \$1.55 billion, which covers the land, works and plan administration items associated with the development in the precinct.⁸

Stormwater works

The plan proposes to deliver about \$115.5 million worth of stormwater works items within the precinct.⁹ The WDURA has two separate catchments, one including Forest, Robins, Reed and Mullet Creeks (located in Stages 1-4 of the plan), and the other encompassing Duck Creek (located in Stage 5). The residential areas of West Dapto have been designed to be above the 1% Annual Exceedance Probability (AEP) flood level according to its development Control Plan.¹⁰

These works include detention basins, enhanced storage areas, gross pollutant traps (GPTs) and drainage.¹¹ The full list of stormwater infrastructure items and associated costs are listed in Table 3.2.

Transport works

The plan intends to deliver about \$965.3 million worth of transport works items within the precinct.¹²

These works include road upgrades, collector roads, sub-arterial roads, local roads, half road frontage, roundabouts, bus shelters and traffic controls and signals.¹³ The full list of transport infrastructure items and associated costs are listed in Table 3.3.

Open space embellishment

The WD CP proposes about \$264 million to local parks, district parks and sporting facilities.¹⁴

The open space embellishment items in the WD CP include landscaping, park furniture, playgrounds and play equipment, sporting fields and car parking.¹⁵

The full list of items and associated costs are listed below in Table 3.4.

Land

The WD CP includes about \$182.2 million in land costs to acquire 191 hectares of land.¹⁶ The council must acquire 35 hectares of land for drainage, 53 hectares for transport works and 103 hectares of land for local open space and recreation.¹⁷ \$3.7 million of this cost will also be allocated to acquisition of land for community facilities.

Land acquisitions are planned to allow for stormwater infrastructure, traffic and transport management and open space and recreation. A list of land costs per/m² can be found in Table 3.5.

Plan administration

The WD CP includes a plan management and administration cost of around \$1.2 million.¹⁸ This is based on 1.5% of the total works costs.

Indexation

The WD CP proposes 2 indexes to be applied in the plan. These are:

- Consumer Price Index (CPI), applied to works cost estimates and to the base contribution rate at the time of payment¹⁹
- Wollongong Local Annual Land Value Index (LVI) applied to land cost estimates²⁰

2.4 Contribution rates in the WD CP

The WD CP levies contributions to each development based on the relevant apportionment of the total costs of the land, works and plan administration items (where relevant) required to service the development.

The council's application sets out its proposed contribution rates for residential dwellings and non-residential development. Table 2.1 sets out the council's proposed contributions rates for each development type.

Table 2.1 WD CP contributions rates (\$Jun23)

Development Type	Plan Contributions Rate
Residential – per lot/dwelling	
Subdivision (per lot), dwelling house, semi-detached & dual occupancy	80,554
Secondary Dwelling	35,242
Multi-unit housing 4+ bedrooms	73,002
Multi-unit housing 3+ bedrooms	62,933
Multi-unit housing 2+ bedrooms	55,381
Multi-unit housing 1+ bedrooms	42,794
Non-Residential – per hectare	
Commercial	620,094
Industrial	196,060

Source: Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 66.

3 Assessment of West Dapto Contributions Plan (2024)

This section provides our assessment of the West Dapto Development Contributions Plan 2024 (WD CP) submitted by Wollongong City Council (the council). It includes our assessment of each of DPHI's 2019 Practice Note criteria, broken down by works category or issue, and our draft recommendations.

3.1 Overview

We assessed the WD CP against the criteria in the DPHI's 2019 Practice Note. For more details on our assessment approach, please see our Information Paper.

We found that the WD CP meets most of the Practice Note criteria. In Table 3.1 we present a summary of our assessment of each infrastructure category and issues relating across all categories.

Table 3.1 Summary of our assessment of the WD CP

Criteria	Stormwater	Transport	Open space	Land	Plan administration
Essential works list	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Nexus	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Reasonable cost	Criteria met	Criteria met	Criteria met	Criteria met subject to recommendation	Criteria met
Apportionment	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Timing	Criteria met	Criteria met	Criteria met	Criteria met	N/A
Community liaison	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Other Matters	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met

3.2 Essential Works List

3.2.1 Stormwater

The council proposes \$115.5 million of stormwater works in the WD CP, and \$40.3 million in land acquisitions.²¹ The WD CP stormwater works include wetlands basins, detention basins, raingardens, gross pollutant traps (GPTs) and drainage. For the full set of stormwater works, see Table 3.2.

Our review of the proposed stormwater infrastructure works items within the WD CP are consistent with the 2019 Practice Note.

3.2.2 Transport

The council proposes \$965.3 million of transport works in the WD CP, and an associated \$75.5 million in land acquisitions.²² The WD CP transport works include road upgrades, collector roads, arterial roads, local roads, roundabouts, bus shelters and traffic controls and signals. For the full set of transport works, see Table 3.3. There is a land component for all transport infrastructure items.

We consider that the transport infrastructure items proposed within the WD CP meets the description in [2019 Practice Note](#) essential works list for land and facilities for transport.²³

3.2.3 Open space

The WD CP proposes around \$264 million in local open space works to embellish 15 passive and active local parks, 3 district parks and 5 district sports parks, with an associated \$62.8 million in land acquisitions.²⁴ For the full set of open space items, see Table 3.4. There is a land component for all local open space infrastructure items.

The open space embellishment items in the WD CP include landscaping, park furniture, playgrounds and play equipment, sporting fields, recreation spaces and car parking. These items are consistent with the essential works list.

3.2.4 Community Facilities

The WD CP includes \$3.8 million for the acquisition of land for community facilities.²⁵ Land costs for Community Facilities are consistent with the essential works list.

3.2.5 Land

The WD CP includes about \$134.2 million of land costs for 191 hectares of land.²⁶ The land acquisitions in the plan are for stormwater infrastructure, land for community facilities, traffic and transport management and open space and recreation.

We consider that the land proposed within WD CP is consistent with the essential works list.

3.2.6 Plan administration

The WD CP includes about \$20.2 million for plan management and administration costs.²⁷ This is based on 1.5% of the total works costs for stormwater, transport and local open space.

Administration costs in the plan include plan preparation, calculating contributions on developments, indexing contributions, assessing requests for exemptions and monitoring rates of development, contributions received and expenditure. The cost of supporting studies and of reviewing the plan every 3 years are also incorporated into the plan's administration costs. We consider that the proposed plan management and administration cost within the WD CP is consistent with the essential works list.

3.3 Nexus

3.3.1 Stormwater

The council's provision of stormwater infrastructure is based on a number of documents, most importantly the *West Dapto Review Flooding and Stormwater Strategy* prepared by Bewsher Consulting in 2008 and the *Water Cycle Management Study* by URS in 2004. These reports outlined a broad strategy for stormwater infrastructure and flood management in the WDURA, with more detail on the needs of individual catchments of the CP subsequently provided in documents such as the *2018 Mullet Creek Flood Model Update*.

In IPART's previous review of the West Dapto CP in 2020, we recommended the council ensure that stormwater infrastructure provisions and locations were consistent with the revised Flood Risk Management Study and Plan that was set for completion in 2021. However, the document was only ready and adopted in May 2023, delaying development of a Stormwater Masterplan. The council is currently budgeted for a Masterplan, with completion expected in mid-2025.

The scope of stormwater works in the CP is therefore unchanged from the 2020 iteration of the plan. We consider that the council has established nexus for stormwater management infrastructure in the plan. However, we recommend the council ensure that the Masterplan and any changes it advises to the location and scope of infrastructure in the plan are adopted prior to its next submission to IPART within three years.

Recommendation



1. Ensure that any necessary changes are made to the scope of infrastructure in the WD CP on the basis of the Stormwater Masterplan prior to the council's next submission to IPART in 3 years' time.

3.3.2 Transport

The council based its transport infrastructure needs on several broad studies and assessments, most notably the 2008 *West Dapto Masterplan Traffic & Transport Review* conducted by Urbanhorizon and the 2010 *West Dapto Urban Release Area – Integrated Transport Plan* produced by AECOM. For our assessment of the 2016 iteration of the CP we engaged transport consultants ARRB Group Ltd (ARRB) to examine nexus and reasonable cost of transport items. ARRB concluded that nexus was established for transport items in the CP based on the studies employed by the council.

Since 2020, the scope of transport works in the WD CP has been largely unchanged. The council has provided QS reports for 10 of 29 new or upgraded roads in the works schedule. These represent up to date design and cost estimates for items for which nexus was already established. We acknowledge that the original studies establishing nexus are nearing 15-20 years old at this stage, however we note the council continues to take a proactive role in updating and internally reviewing the transport needs of the plan. This includes establishing up to date designs for major roads in the plan and wider regional considerations, such as concurrent development as part of the Illawarra-Shoalhaven Regional Plan 2041.

Transport infrastructure is largely the same as in previous reviews of the plan and the basis of its inclusion remains relevant. We therefore concluded that nexus is established for the transport items in the WD CP.

3.3.3 Open space

Open space needs in the WDURA were originally based on the findings of the 2007 *Social, Cultural and Recreation Needs Study* prepared by Elton. Following our review of the 2020 West Dapto Contributions Plan, the council commissioned a new *Social Infrastructure Needs Assessment* (SINA), which was delivered in 2023. This was completed in response to IPART's recommendation that the open space needs of the WDURA be examined prior to any future review. The 2023 SINA incorporated new information such as a larger projected increase in population and new planning documents such as the *West Dapto Vision 2018*. It was also informed by more contemporary standards for the provision of open space, such as the aim to "Ensure 85-90% of residents within WDURA are located within a 5-7 minute walk of high quality and functional open space".²⁸

These principles and the recommendations of the SINA have guided revisions to open space in the WD CP. The study identified the need for significant increases in open space quantity and sporting facilities, recommending the CP adopt a further 87.8ha of open space by 2058. It also recommended that 7 parks be expanded and converted to include district level sporting grounds. This study establishes nexus for the expanded open space and embellishment proposed in the WD CP.

3.3.4 Community Facilities

The WD CP includes \$3.8 million for the acquisition of land for the purposes of community facilities. This will provide land for two sub-district level and four neighbourhood level multi-purpose community centres. The 2023 *West Dapto Social Infrastructure Needs Assessment* established the need for an additional community facility beyond those included in the 2020 variation of the plan.²⁹

The sub-district level will serve a population of around 20,000-30,000 people, while the neighbourhood level centres will cater to 1,000 - 5,000 people. This is consistent with the projected population growth of the West Dapto Urban Release Area.³⁰

The demand for the facilities is consistent with the council's technical studies and projected population growth. Nexus is therefore established for land for community facilities in the WD CP.

3.3.5 Plan administration

The WD CP includes plan administration costs to cover the costs of council staff time to prepare and review the contributions plan, commission technical studies, accounting for contributions receipts and expenditure, and coordinate the implementation of works.³¹

The costs will also cover the costs of consultant studies that are commissioned for land valuations and designs and cost of works, and for reviewing the development and demand assumptions in the plan.

As these costs arise directly because of development within the precinct, there is established nexus for administration costs in the plan.

3.4 Reasonable Cost

3.4.1 Stormwater works

We consider that the costs for individual stormwater works items in the WD CP are reasonable. The costs for stormwater works are shown in Table 3.2.

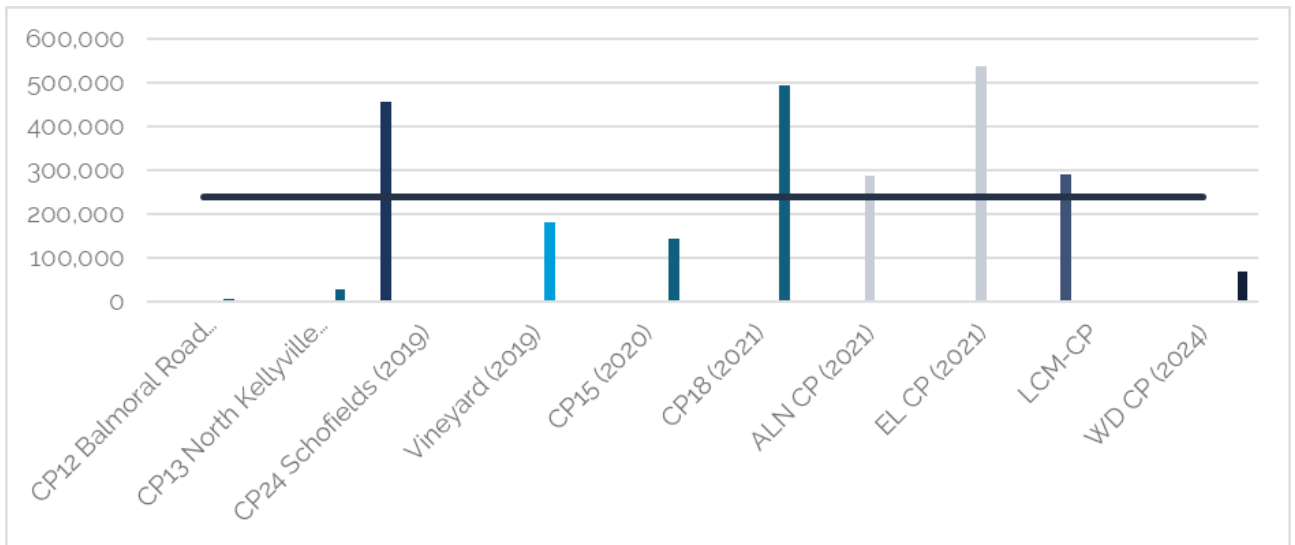
Table 3.2 Costs for stormwater works in the WD CP (\$Jun23)

ID	Description	Cost
SM01	Detention basins (including gross pollutant trap)	\$95,414,182
SM02	Enhanced storage areas – Forest Creek	6,913,578
SM03	Enhanced storage areas – Robins Creek	4,659,052
SM04	Enhanced storage areas – Reed Creek	4,032,543
SM05	Enhanced storage areas – Mullet Creek	5,610,560
SM06	Enhanced storage areas – Duck Creek	9,368,103
SM07	Trunk Drainage	29,753,199

Source: Wollongong City Council, WD CP, *Works Schedule – West Dapto 2024 Plan*, Transport Tab

We compared stormwater works costs (per hectare of net developable area) in the plan to other plans that we have assessed and found that stormwater works in the WD CP of \$67,071 per hectare of net developable area is well below the average of other plans we have assessed (Figure 3.1).

Figure 3.1 Stormwater works cost per hectare of NDA (\$Jun23)



Source: IPART analysis, WD CP 2024 works per person and ha of NDA, Stormwater per NDA costs Tab

The base costs for detention basins, enhanced storage areas and trunk drainage works in the WD CP are based on the same technical studies and consultant advice used in the two previous iterations of the plan. These have been indexed but infrastructure provision and cost largely remains unchanged. We consider these costs remain reasonable; however, we note that Figure 3.1 demonstrates stormwater works costs per hectare are well below the average of other CPs.

Considering the age of the council's original cost estimates and supporting studies in the plan, it is possible that costs will increase with a future revision of scope and works. We encourage the council to review the scope and costs of stormwater works following the delivery of the master plan and include any changes in the next revision of the WD CP.

Draft Recommendation

- 2. Ensure that any necessary changes are made to the cost of works in the CP on the basis of the Stormwater Masterplan prior to the council's next submission to IPART in 3 years' time.

3.4.2 Transport works

Transport costs contribute a significant proportion of the plan, around 66% of the total costs of the WD CP. The cost of transport works totals \$965.3 million. The most expensive transport items involve planned new and upgraded major arterial roads, including the key arterial roads connecting the precinct to the Princes Highway. Construction of these roads total \$450 million and contribute approximately \$23,000 to the contribution rate of a standard dwelling.

The costs for transport works items are shown in Table 3.3.

Table 3.3 Costs for transport works in the WD CP (\$Jun23)

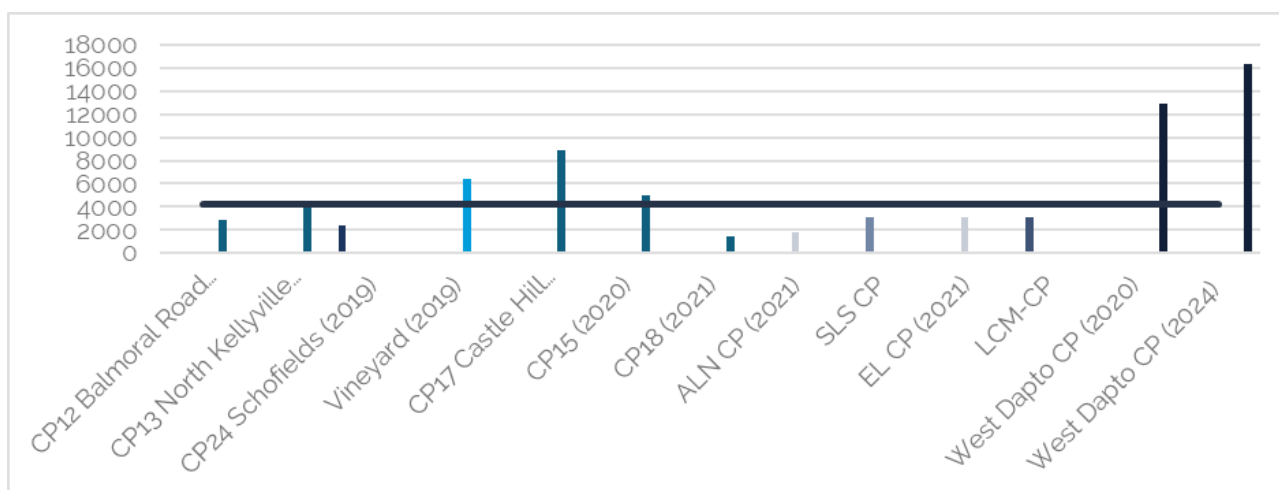
ID	Description	Cost
TR01	West Dapto Road (Stage 1-2), existing road, 2/4 lanes, 5,008m	51,399,902
TR02	West Dapto Road Rail Crossing (Stage 1-2, completed), existing road, 2 lanes, 87m	2,770,251
TR03	Sheaffes Road (Stage 1-2), existing road, 2 lanes, 1,455m	13,119,419
TR04	Paynes Road (Stage 1-2) existing road, 2/4 lanes, 788m	20,217,968
TR05	Smiths Lane (Stage 1-2, completed) existing road, 2 lanes, 93m	3,865,740
TR06	Wongawilli Road (Stage 1-2), existing road, 2 lanes, 336m	6,292,866
TR07	Darkes Road (Stage 1-2), existing road, 2 lanes, 1,554m	23,653,785
TR08	Shone Road (Stage 1-2), existing road, 2/4 lanes, 1,365m	9,840,099
TR09	Bong Bong Road rail crossing (Stage 1-2)	48,415,092
TR10	Bong Bong Road (Stage 1-2), existing road, 2 lanes, 1,288m	14,756,088
TR11	Reddalls Road (Stage 1-2), existing road, 2 lanes, 490m	5,204,094
TR12	Wyllie Road (Stage 1-2), existing road, 2 lanes, 480m	4,092,192
TR13	Cleveland Road (Stage 3), existing road, 2/4 lanes, 4,862m	81,085,140
TR14	Avondale Road (Stage 4), existing road, 2/4 lanes, 3,302m	42,239,153
TR15	Huntley Road (Stage 4), existing road, 4 lanes, 1,169m	28,200,735
TR16	Yallah Road (Stage 5), existing road, 4 lanes, 1,720m	28,763,802
TR17	Marshall Mount Road (Stage 5), existing road, 4 lanes, 5,600m	19,784,047
TR18	Northcliffe Drive extension – east, Princes Hwy to Paynes Rd (Stage 1-2), new road, 4 lanes, 4,148m	194,905,186
TR19	Northcliffe Drive extension – west, Sheaffes Road to West Dapto Road (Stage 1-2), new road, 4 lanes, 1,108m	40,098,248
TR20	Iredell Road (Stage 1-2), new road, 2 lanes, 500m	15,407,951
TR21	Brooks Reach to Cleveland (east) (Stage 1-2),	14,304,010
TR22	Fairwater Drive (Stage 3) (Completed), new road, 2 lanes, 758m	12,792,529
TR23	Fowlers Road Extension (Stage 3) (Completed), new road, 4 lanes, 1,227m	35,512,566
TR24	Eastern link Road (Bong Bong Road to Fowlers Road) (Stage 3), new road, 2 lanes, 615m	13,423,151
TR25	Western Ring Road – Shone Avenue to Yallah Road (Stage 1-5), new road, 4 lanes, 7,419m	177,947,261
TR26	Brooks Reach to Huntly Link (Stage 3), new road, 2 lanes, 2,109m	46,975,718
TR27	Eastern Link Road (Fairwater Drive to Avondale Road)	18,160,026
TR28	Eastern Spine Road – Western Ring Road to Huntly Road (Stage 4), new road, 2 lanes, 1,425m	25,186,336
TR29	Marshall Mount Town Centre Bypass (Marshall Mount Road to Yallah Road) (Stage 5), new road, 2 lanes, 2,300m	9,425,182
TR30	Bus shelters	8,506,595
TR31	Bus Transport Kiosk	2,020,336
TR32	Stage 1-2 Shared Use Pathway	8,624,834
TR33	Stage 3 Shared Use Pathway	4,519,593
TR34	Stage 4 Shared Use Pathway	4,519,593
TR35	Stage 5 Shared Use Pathway	2,208,691
TR36	Shared Use Pathway Bridges	2,581,351

Source: Wollongong City Council, WD CP, Works Schedule – West Dapto 2024 Plan, Transport Tab

We examined the overall transport works included in WD CP and compared them to other plans we have assessed.

Overall, we found that transport works costs in the WD CP of \$16,356 per person are well above the range of other plans we have assessed (Figure 3.2).

Figure 3.2 Transport works cost per person (\$Jun23)



Source: IPART analysis, WD CP 2024 works costs per person and ha of NDA, Transport p.p. works costs Tab

Transport works costs in the WD CP are very high both as a percentage of the overall plan and compared to other contributions plans. A significant portion of this cost is derived from construction of new key arterial roads in the WDURA such as the Northcliffe Drive Extensions and the Western Ring Road. The council has attempted to obtain grants for these roads as in its view the significance of them goes beyond the scope of the development. The specific items in question are TR16, TR18, TR19 and TR25 in the works schedule.

These road constructions total roughly \$447 million, nearly half of transport works costs. They also contribute roughly \$24,000 to the contributions rate of a standard dwelling.³² The council's studies establish that these items are critical to meeting the demand that will be generated by development as well as connecting the WDURA externally to other major roads. All of these items have individual QS and design reports that are contemporary.

The council's position is that these items should be funded by the state government and removed from the CP as they function beyond the WDURA as major arterial roads. The council has sought grants for these items but has so far been unable to secure funding. DPPI has recommended at this stage that the items remain in the plan. While there is the potential for over recovery if grants are later forthcoming, there is also a risk of a funding gap emerging in contributions plans if significant items are left unaccounted for as the plan reaches maturity. This would result in increased costs borne by the latter stages of development and/or ratepayers.

Given this, the critical nature of the infrastructure and the uncertainty about funding being received, we have decided that the transport costs are reasonable in the circumstances. We note that in our assessment of the 2020 iteration of the West Dapto Contributions Plan we recommended costs be reviewed if grant funding was provided. This later occurred with West Dapto Road (TR01), with \$22.9 million removed from the cost of transport works. On balance a similar approach is the best course of action for the current CP. We recommend the council review its costs and update them accordingly in the event that grant funding is secured.

Secured Grant Funding

Aside from the significant items mentioned above, the council is seeking grant funding for other items. The council has received grants totalling \$74.4m for roads which are outlined in the works schedule and are not included in the total costs. In June 2024, the council successfully applied for a partially funding grant for Cleveland Road (item TR13) through the NSW Housing Infrastructure Fund. This was announced as part of the NSW State 2024-25 budget, although at the time of writing, the council is awaiting DPHI confirmation and creation of a funding agreement. The grant is in the amount of \$19.9 million, with the total costs of TR13 being \$81 million.³³ As per our above recommendation, we recommend the council review costs and adjust the CP in response to any grant funding received.

Draft Recommendation

- 3. The council should review transport works costs and make adjustments for any grant funding received following the adoption of the plan.

3.4.3 Open space works

The cost of open space embellishment works in the WD CP is about \$264 million. The costs for open space works in the WD CP are shown in Table 3.4.

Table 3.4 Costs for open space works in the WD CP (\$Jun23)

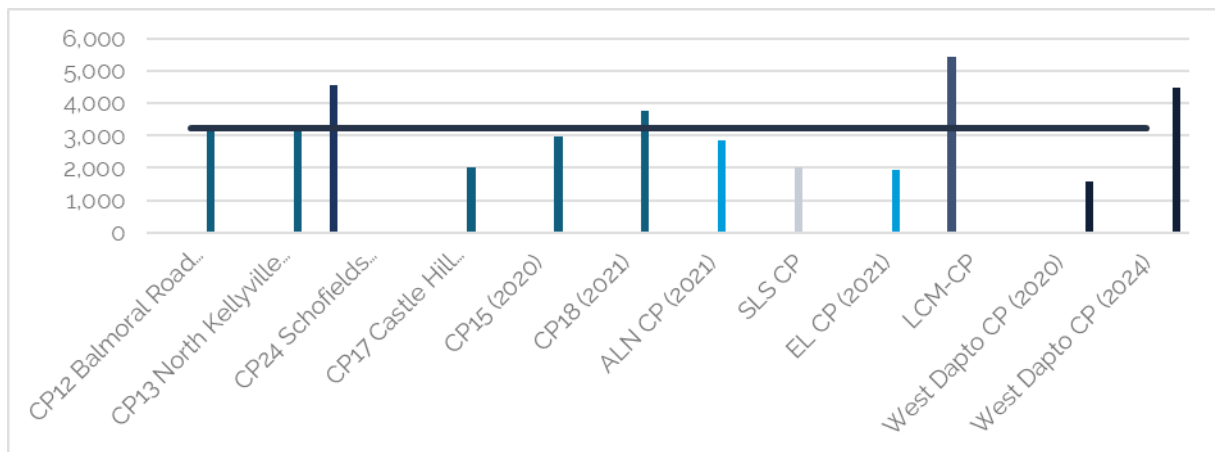
ID	Description	Cost
OS01	District Sports Park	34,743,578
OS02	Local Park	6,355,962
OS03	Local Park – Stane Dyke Park	1,651,843
OS04	Local Park - McPhail Reserve	2,680,360
OS05	Local Park - Mogomorra Park	1,912,779
OS06	District Recreation	12,041,262
OS07	Local Park	6,469,981
OS08	Local Park	4,437,567
OS09	Local Park - Bankbook Park	1,038,863
OS10	District Park	24,926,532

ID	Description	Cost
OS11	District Park	38,908,578
OS12	Local Park	6,469,981
OS13	Community leisure and recreation centre (part only)	3,527,948
OS14	Local Park	4,437,567
OS15	Local Park	2,736,602
OS16	District Sport	37,158,578
OS17	District Sport	23,176,532
OS18	Local Park	5,019,981
OS19	District Sport	23,176,532
OS20	District Sport	37,908,578
OS21	Local Park	5,469,981
OS22	Local Park	5,469,981
OS23	District Sport	27,101,532
OS24	Local Park	4,445,567
OS25	Local Park	5,469,981
Total		326,736,645

Source: Wollongong City Council, WD CP, *West Dapto 2024 Works Schedule*, Open Space and Summary Rates Tabs

We assessed the overall costs of open space works in comparison to other plans. Overall, we found that open space works costs (per person) in the WD CP are \$4,475 per person (Figure 3.3).

Figure 3.3 Open space works cost per person compared to other plans (\$Jun23)



Source: IPART analysis, *WD CP 2024 works costs per person and ha of NDA*

Figure 3.3 demonstrates that while above average, open space works costs in the WD CP are not out of step with other recent contributions plans. We also note that open space costs per person were well below the average in the previous version of the plan. The large increase likely reflects the age of the council's initial scope assessments and cost estimates (from 2008 and 2010 respectively) and the council's review of open space scope and works since 2020 and the recommendations of the updated 2023 SINA.

Contemporary cost estimates for open space works in the plan were delivered by Genus Advisory before delivery of the updated 2023 SINA. These have been partially based on indexation of previous costs based on benchmarks, comparisons to other Wollongong plans and VPA agreements. Actual costs from the delivery of infrastructure have also been used where available. The basis of these cost estimates is reasonable.



While the increase in works costs over the previous iteration of the plan is significant, it has a sound basis informed by contemporary assessments in the open space needs of the WDURA. Cost increases have been driven by a professional evaluation that the council should increase open space quantity and quality in the CP area. We also note that this review of open space needs and costs was conducted on the basis of IPART's recommendation in our previous assessment. We therefore determine that open space works costs in the WD CP are reasonable.

Secured Grant Funding

In June 2024, grant funding from the Commonwealth Priority Community Infrastructure Program was secured to assist in construction of the Darkes Sporting Facility, item OS01 on the works schedule. The grant is for \$9 million, while the item's total cost is \$34.7 million.³⁴ The council is also seeking grant funding to assist in Stage 2 of OS01, including an additional \$0.7 million for design under the Commonwealth Regional Precincts and Partnerships Program and \$5.5 million from a NSW State Voluntary Planning Agreement.³⁵ These grants are currently under assessment.

As with transport works items, we recommend the council review costs in the CP in response to any grant funding received.

Draft Recommendation

4.  The council should review open space works costs and make adjustments for any grant funding received following the adoption of the plan.
5.  The council should review costs and make adjustments for any other grant funding received for costs not related to transport and open space works following the adoption of the plan.

3.4.4 Land

The WD CP includes almost \$182.3 million in land costs, which is roughly 12% of the total cost of the plan.³⁶

The council has relied on Walsh and Monaghan to prepare a valuation report (7 September 2022).³⁷ This report examined recent comparable land sales evidence to determine a square metre rate for 17 categories of land. To determine land acquisition rates, the direct comparison of sales in the general vicinity of the WDURA was conducted.

Table 3.5 Land acquisition cost rates per sqm for the WD CP (\$/m², \$Sep22)

Land zoning	Cost rate
R2 Low Density Residential	130
R3 Medium Density Residential	145
R5 Large Lot Residential	95
B1 Neighbourhood Centre	200
B2 Local Centre	250
B4 Mixed Use	225
B6 Enterprise Corridor	225
C2 Conservation	5
C3 Environmental Management	10
C4 Environmental Living	58
C2/C3 Environmental (watercourse/riparian)	3
RE1 Public Recreation	80
RE2 Private Recreation	20
RU1 Primary Production	10
RU2 Rural Landscape	10
IN2 Light Industrial	150
IN3 Heavy Industrial	150

Source: Walsh and Monaghan, *Valuation Report West Dapto Urban Release Area*, 7 September 2022.

The council applied the 17 cost rates across land acquisitions for transport, open space, community facilities and stormwater infrastructure. The relevant land value (i.e. R1, riparian etc) has been applied for each item, including split values where multiple zoning types are present.³⁸ The council will index the rates determined by Walsh and Monaghan with a Land Value Index (LVI). The LVI uses an annual land index rate of the 5-year average percentage in land value changes in the Wollongong LGA based on data published by the Valuer General.³⁹ The council notes that the 5-year average is in place to account for year-to-year anomalies and changes in the local market.

The council's land value rates are based on professional valuations and tied to an LVI which is based on a local property value and a reasonable methodology. We therefore determine the council's approach to estimating and indexing land values is reasonable.

Land acquisition costs

The council has not applied a land acquisition allowance for meeting costs for heads of compensation under the *Land Acquisition (Just Terms Compensation) Act 1991*. Given the plan is in its early stages and will have a long lifetime, the inclusion of a land acquisition allowance could help to ensure more accurate estimates for land acquisition costs. We encourage the council to review the adoption of a land acquisition allowance for the WD CP prior to its next submission to IPART.

The council has not included costs associated with the processes that are involved in the acquisition of land. Although likely to be a very minor change to the overall cost of the plan, the council should consider the implementation of costs for the processes of land acquisition.

Draft Recommendations

- 6. The council should review the inclusion of a land acquisition allowance for the purposes of land acquisition under the Land Acquisition (Just Terms Compensation) Act 1991.
- 7. The council should review the inclusion of costs associated with the processes of acquiring land.

3.4.5 Plan administration

The WD CP proposes around \$20.8 million for plan management and administration costs.⁴⁰ This is based on the IPART 1.5% benchmark of the total works costs for stormwater, transport and local open space. We consider this approach reasonable, and we note that it is similar to the approach taken in other plans.

3.4.6 Other

Contingency allowance for stormwater works, transport works and open space embellishment works

In our previous review of the West Dapto Contributions Plan (2020) we noted many contingencies for items were too high and recommended they be lowered.

Dependent on the project stage, our 2014 benchmarks for contingency allowances allow for:

- stormwater works, 30% for the strategic review stage or 20% for the business case stage
- transport works, 30% for the strategic review stage or 20% for the business case stage
- open space embellishment, 20% for the strategic review stage or 15% for the business case stage.⁴¹

The council has applied contingency rates across the CP of 25% for designs that have not begun or are in a strategic format, 20% for the concept design stage, 15% for complete or detailed designs, 10% for allocated designs and 5% for ongoing project management.⁴² The council's approach to contingencies is in line with our previous recommendations, with contingency rates for each item either at or slightly below the IPART recommended rate.⁴³ For each item, the council has escalated the contingency rate depending on when the item is to be delivered, with larger contingencies for items with a longer lead time. The council's approach to contingency rates in the WD CP is reasonable.

3.4.7 Stormwater

The council plans to apportion stormwater costs across residential and non-residential development. The council plans to apportion stormwater costs on a per hectare of net developable area (NDA) basis for both residential and non-residential development. In the precinct, 84.3% of developable land is zoned for residential purposes, 14.4% is zoned for industrial/other uses and 1.3% for commercial purposes.⁴⁴

We note that in the 2020 iteration of the West Dapto Contributions Plan, rates had been adjusted for lower apportionment to commercial and industrial development. We recommended that this be changed to reflect impervious surface area being the main factor driving the need for stormwater infrastructure. The council subsequently altered its approach and apportioned stormwater costs based on a percentage of net developable area attributed to each development type.

A per person rate has been used for the apportionment in the CP for consistency with other infrastructure items (open space and transport) to show an overall per dwelling rate for residential development. The council has apportioned stormwater development entirely to the plan.

We consider the council's approach to stormwater apportionment reasonable.

3.4.8 Transport

Total transport costs are apportioned between residential, industrial and commercial development on an adjusted NDA basis. The area for industrial and commercial development is adjusted *"to recognise the varying levels of land intensification and demand on infrastructure"*.⁴⁵

The WD CP applies apportionment factors of 1.0 for residential, 0.75 for commercial, and 0.15 for industrial development. The result is that while residential development accounts for 84.3% of land use it pays for 96.4% of transport costs.⁴⁶ The council's modelling shows a lower demand for transport infrastructure in the WDURA generated by industrial development, based on the position of industrial land and its proximity to the M1 Motorway.

During our previous assessment, we noted that there was no such modelling for commercial development. However, the impact of the council's model is very small to contribution rates, resulting in a change of transport apportionment to commercial development from 1.27% to 1.09%. We therefore consider the council's approach broadly reasonable.

The council has partially apportioned the cost of three roads in Stage 5 of the plan to the Calderwood development (Table 3.6 Apportionment of roads to the Calderwood development).

Table 3.6 Apportionment of roads to the Calderwood development

Item	Total Cost (\$Jun,2023)	Apportionment to the plan	Cost to the CP (\$Jun,2023)
TR16 Yallah Road	34,975,671	82%	28,763,802
TR17 Marshall Mount Road	92,203,073	21%	19,784,047
TR19 Marshall Mount Town Centre Bypass	34,490,105	27%	9,425,182

Source: Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 36.

In determining the level of apportionment to Calderwood, the council created a model for determining demand arising to and from the area to access the M1 Motorway. Traffic Design Group reviewed the methodology behind the plan in 2020 and found it to be reasonable. As in our previous assessment of the CP, we consider this apportionment to Calderwood to be reasonable.

3.4.9 Open space

Open space costs have been apportioned in full to the plan on a per person basis to residential development only as residential development will drive demand for open space.⁴⁷ Open space infrastructure is expected to serve the residents of the WDURA and has therefore been apportioned 100% to the plan.⁴⁸

The council's approach is consistent with that of other plans we have assessed.

3.4.10 Plan administration

The WD CP uses the IPART benchmark of 1.5% of works costs for plan administration.⁴⁹ This is a reasonable approach.

3.5 Timing

The plan indicates timeframe of roughly 40 years for the remaining development. The council proposes that the development of dwellings is aligned with the proposed infrastructure required to service the specific stage of development, with the stages and timing subject to review during the life of the development.⁵⁰

The WDURA has been split into five areas or stages, however these do not represent a sequential order of development. The majority of development that has already proceeded has occurred in Stage areas 1&2 of the plan, corresponding to Kembla Grange, Sheaffes/Wongawilli and West Horsley.⁵¹

The 2019 Practice Note requires us to consider whether the proposed public amenities and public services can be provided within a reasonable timeframe. The 2005 Practice Notes provide further guidance that it is the responsibility of a council to ensure the infrastructure meet the needs of a development. This includes ensuring that the works schedule included in the contributions plan specifying the likely timing for the provision of the infrastructure is based on the anticipated receipt of contributions and the satisfaction of the demands of the population.⁵²

The council's works schedule includes indicative timing for delivery of each infrastructure item, within a five-year band. We consider the WD CP satisfies the assessment criterion for timing of infrastructure delivery.

3.6 Community Liaison and Publicity

The council's application states that it consulted with the community on the plan, exhibiting it alongside the planning proposal, draft Development Control Plan, and Planning Agreement, for the 28-day period between 6 November to 4 December 2023.⁵³

The council received 28 submissions from:

- Community members (7 submissions)
- Developers and/or developers' consultants (15 submissions)
- Transport NSW
- School Infrastructure NSW
- Property Council of Australia (PCA) – Illawarra
- Urban Development Institute of Australia (UDIA) – Illawarra
- Regional Development Australia (RDA) – Illawarra
- Illawarra Bicycle User Group

On 18 March 2024 a report was presented to the council detailing public exhibition, submissions raised, and staff response to submissions. At this meeting, the council resolved to note the summary of issues raised during public exhibition and endorsed the submission of the WD CP 2024 for IPART review.

The council considered the submissions and incorporated post-exhibition amendments in response to the submissions received.⁵⁴ These amendments were made prior to submitting the WD CP to IPART for review.⁵⁵ We consider the council's amendments to the plan in response to submissions reasonable.

We have determined that the council's community liaison and consultation process meet the Practice Note requirements to conduct appropriate community liaison and publicity in preparing the contributions plan.

3.7 Any other Matters

3.7.1 Indexation

Where works cost estimates are sourced from an earlier period than the base period of the plan, they have been indexed to the base period of the plan using:

- ABS PPI 3101 Road and Bridge Construction Index for NSW for transport and stormwater management infrastructure
- ABS PPI 3020 Non-Residential Building Construction Index for NSW for open space infrastructure

The WD CP proposes the ABS Sydney All Groups Consumer Price Index (CPI) be applied to the base contribution rates at the time of payment.⁵⁶

The indexation approach in the WD CP is similar to other plans we have assessed, and we consider it reasonable.

3.7.2 Provision of open space appears low

In our review of the West Dapto Contributions Plan (2020) we noted the provision of open space was low, particularly in Stages 3,4 and 5 of the plan. We also identified that the provision of sporting facilities in the plan was too low. We recommended the council review its open space needs.

The council's 2023 SINA included recommendations to vastly increase the quantity of open space by 87.8ha over the plan's lifetime.⁵⁷ It also called for an increase in the amount of sporting grounds by converting 7 parks in the plan to accommodate district sporting grounds and additional space. The SINA also assessed that 50.4ha of open space in the suburb of Horsley could not be allocated to the residents of the WDURA.⁵⁸ The council has added an additional 25.4ha of open space to the plan and has also incorporated the cost of converting 7 district parks to include sporting facilities.

We note that the council has met its benchmarks in regard to district level open space but is below the benchmarks for the provision of local and passive open space. The overall provision of open space has decreased from 2.23ha per 1000 people in the 2020 iteration of the plan to 1.74ha. In a meeting on July 25th, the council responded to our concern about the lack of open space in the works schedule by noting that it is negotiating the provision of more local parks from developers. The council stated that the SINA is the guiding principle in the design and locations of these parks to ensure ease of access for residents. The council notes that with this additional provision the plan is expected to roughly meet the Growth Centre Benchmark of 2.83ha of open space per 1,000 people.

This is a reasonable approach to the shortfall of open space available in the works schedule. However, we recommend that the council provide example documentation and quantities of the parks being constructed by developers to IPART during our next review of the contributions plan in order to allow us to measure the effectiveness of this policy.

Draft Recommendation

- 8. The council should provide documentation and quantitative information regarding the amount of open space being provided by developers in its next submission to IPART in three years' time.

3.7.3 Assessment against the EPA regulations and requirements

We have determined that the WD CP contains the information required by clause 212 of the EPA Regulation. This clause requires the inclusion of certain information in a contributions plan for the purpose of establishing scope and location.

A summary of our assessment of the WD CP against the EPA Regulation is provided in Table 3.7.

Table 3.7 Assessment against EPA regulations and requirements

Subsection	Requirement	Location in plan
1(a)	Purpose of the plan.	Section 2.6
1(b)	Land to which the plan applies.	Section 2.5, Figure 1
1(c)	The relationship between the expected types of development in the area to which the plan applies and the demand for additional public amenities and services to meet that development.	Section 2.1 and 2.6
1(d)	The formulas to be used for determining the section 7.11 contributions required for different categories of public amenities and services.	Section 4.1.6, 4.2.6, 4.3.6, 4.3.7, 4.4.6, 4.4.7, 4.5.3 and 4.5.4
1(e)	The section 7.11 contribution rates for different types of development, as specified in a schedule in the plan.	Section 4.1.6, 4.2.6, 4.3.6, 4.3.7, 4.4.6, 4.4.7, 4.5.3 and 4.5.4
1(f)	A map showing the specific public amenities and services proposed to be provided by the council.	Figures 1-9
1(g)	A works schedule that contains an estimate of the cost and staging (whether by reference to dates or thresholds).	Works Schedule - West Dapto - 2024
1(h)	If the plan authorises monetary section 7.11 contributions or section 7.12 levies paid for different purposes to be pooled and applied progressively for those purposes, the priorities for the expenditure of the contributions or levies, particularised by reference to the works schedule.	Section 2.20
2(b)	If a contributions plan authorises the imposition of a development levy condition, the plan must contain the method, if any, of adjusting the proposed cost of carrying out the development, after being determined by the consent authority, to reflect quarterly or annual variations to readily accessible index figures adopted by the plan between the day of the determination and the day by which the levy must be paid.	Section 2.23 and 2.24
3	A contributions plan must contain information about the council's policy about the following— (a) the timing of the payment of monetary development contributions, (b) development levies, (c) the imposition of development contribution conditions or development levy conditions that allow deferred or periodic payment.	Section 2.21, Table 2 & 2.15
4	A contributions plan that provides for the imposition of development contribution conditions or development levy conditions in relation to the issue of a complying development certificate must provide that monetary payments in accordance with the conditions must be made before the commencement of the building work or subdivision work authorised by the certificate	Section 2.16 & 2.17
5	In determining the section 7.11 contribution rates or section 7.12 levy percentages for different types of development, the council must take into consideration the conditions that may be imposed under section 4.17 (6)(b) of the Act or section 97 (1)(b) of the Local Government Act 1993.	N/A
6	A contributions plan may authorise monetary development contributions or development levies paid for different purposes to be pooled and applied progressively for the different purposes only if the council is satisfied that the pooling and progressive application will not unreasonably prejudice the carrying into effect, within a reasonable time, of the purposes for which the money was originally paid.	Section 2.20

- ¹ Department of Planning, *Housing and Infrastructure, Practice Note – Local Infrastructure Contributions*, January 2019. pp-14-16.
- ² Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 18.
- ³ Walsh and Monaghan, *Valuation Report West Dapto Urban Release Area 2022*, p 7.
- ⁴ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 7.
- ⁵ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 16.
- ⁶ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 18.
- ⁷ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p 4.
- ⁸ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ⁹ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ¹⁰ Brewsher Consulting, *WEST DAPTO REVIEW – FLOODING & STORMWATER STRATEGY 2008*, pp 13-19.
- ¹¹ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 61.
- ¹² Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ¹³ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, pp 35-36.
- ¹⁴ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ¹⁵ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, pp 23-24.
- ¹⁶ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 6.
- ¹⁷ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ¹⁸ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ¹⁹ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p 17.
- ²⁰ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p 18.
- ²¹ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
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- ²³ Department of Planning, *Housing and Infrastructure, Practice Note – Local Infrastructure Contributions*, January 2019.
- ²⁴ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
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- ²⁸ Ethos Urban, *West Dapto Community Infrastructure Needs Assessment and Gap Analysis*, 8 August 2023, p.27
- ²⁹ Ethos Urban, *West Dapto Community Infrastructure Needs Assessment and Gap Analysis*, 8 August 2023
- ³⁰ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 61.
- ³¹ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 61.
- ³² Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ³³ Wollongong City Council, *Email – Council Grants Applied for Information*
- ³⁴ Wollongong City Council, *Email – Council Grants Applied for Information*
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- ³⁶ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ³⁷ Walsh and Monaghan, *Valuation Report West Dapto Urban Release Area*, 7 September 2022.
- ³⁸ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p16.
- ³⁹ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p18.
- ⁴⁰ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ⁴¹ IPART, *Final Report – Local Infrastructure Benchmark Costs*, April 2014.
- ⁴² Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, April 2024, p 14.
- ⁴³ IPART, *Final Report – Local Infrastructure Benchmark Costs*, April 2014, p 51.
- ⁴⁴ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 18.
- ⁴⁵ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 18.
- ⁴⁶ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 18.
- ⁴⁷ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 19.
- ⁴⁸ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ⁴⁹ Wollongong City Council, *Works Schedule West Dapto Contributions Plan 2024*.
- ⁵⁰ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, pp 114-115.
- ⁵¹ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 17.
- ⁵² Department of Planning, *Housing and Infrastructure, Development Contributions – Practice Note Principles Underlying Development Contributions*, July 2005, p 3.
- ⁵³ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, p 3.
- ⁵⁴ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, pp 6-7.

- ⁵⁵ Wollongong City Council, *Application for assessment of a local infrastructure contributions plan West Dapto Development Contributions Plan 2024*, pp 6.
- ⁵⁶ Wollongong City Council, *West Dapto Development Contributions Plan 2024*, p 13.
- ⁵⁷ Ethos Urban, *West Dapto Community Infrastructure Needs Assessment and Gap Analysis*, 8 August 2023, p 139.
- ⁵⁸ Ethos Urban, *West Dapto Community Infrastructure Needs Assessment and Gap Analysis*, 8 August 2023, pp 139-147.

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ISBN 978-1-76049-754-5