



Assessment of Contributions Plan
Glenmore Park Stage 3 At Mulgoa
Development Contributions Plan 2022

Penrith City Council

Final Report

September 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 Contributions Plan Committee Members

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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](#).

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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.

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.¹ 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 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). The 2019 Practice Note must be read in conjunction with the July 2005 ([2005 Practice Notes](#)) which outlines the requirements for local councils in preparing and administering their contributions plans.

Penrith City Council (the council) submitted *Glenmore Park Stage 3 At Mulgoa Development Contributions Plan 2022* (GP3 CP) to IPART for assessment on 29 September 2023. The council is seeking to levy development contributions above the \$20,000 cap per lot/dwelling. This is the first time that IPART is reviewing GP3 CP.

We assessed GP3 CP against the 2019 Practice Note criteria.¹ We found that the plan meets most of the 2019 Practice Note criteria (see Figure 1.1). We have made recommendations on how the council can amend the plan to fully demonstrate the Practice Note criteria.

Figure 1.1 Summary of our assessment of GP3 CP

Essential Works List	Nexus	Reasonable Cost	Reasonable apportionment	Reasonable timeframe	Community liaison and publicity	Other matters
						
Demonstrated	Demonstrated	Demonstrated subject to recommendation	Demonstrated subject to recommendation	Demonstrated	Demonstrated	Demonstrated

¹ Section 7.11 of the Environment Planning and Assessment Act 1979 allows councils to levy contributions towards the cost of providing local infrastructure.

1.1 Recommendations

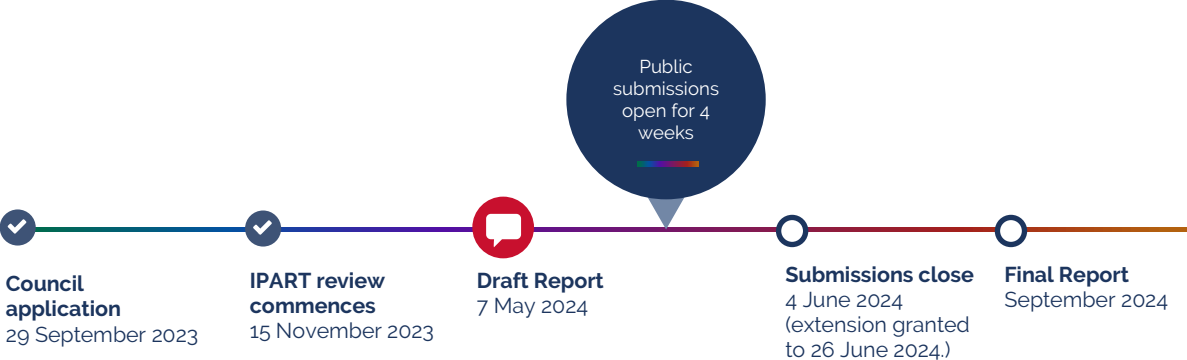
We have made recommendations where the GP3 CP did not fully meet the Practice Note criteria. After implementing our recommendations, the total costs of the plan will have increased by 2%, from around \$225 million to \$230 million, mostly due to recommending increased contingencies, updating plan administration costs and fixing errors in the work schedule. The council's proposed contribution rates ranged from \$48,861 to \$104,238 and our recommended contribution rates range from \$49,549 to \$105,705.

Recommendations

1.	That the council regularly review the costs of infrastructure items in the contributions plan over the life of the development.	21
2.	That the council update the underlying zoning to the C4 rate for transport land item T5.	26
3.	That the council update the cost of plan administration to be 1.5% of the revised total works costs.	27
4.	That the council use the following contingency allowances:	28
	a. 30% for MB1, VB2, MB3, MB4 and MB5 stormwater works items	28
	b. 20% for transport works	28
	c. 15% for open space embellishment works.	28
5.	That the council adjust the work schedule for residential development to:	29
	a. remove the contingency allowance from the base cost of the land for INT1-5	29
	b. update the CPI values for transport works and land costs to reflect the September 2023 indexed value.	29
	c. to reduce the land disturbance allowance for transport land items T3.4, INT4 and INT3 to 5%.	29
	d. adjust T2.1 and T3.1 to use the R2 (>10,000 square metre) rate, T3.4 to use the R3 (<10,000 square metre) rate, and T3.5 to use the R2 (<10,000 square metre) rate from the land valuation report.	29
6.	That the council apportion transport and stormwater costs to residential development on a per-person basis and to non-residential development on a per hectare of NDA basis.	31
7.	That the council apportion transport and stormwater land and works costs for the public school site to residential development.	31
8.	That the council ensures that it does not recover contributions for the same infrastructure items through both GP3 CP and the council's Section 7.12 City Wide Development Contributions Plan for Non-Residential Development.	31
9.	That the council apportion plan administration costs for transport and stormwater to non-residential development.	31
10.	That the council regularly review the work schedule to ensure infrastructure is rolled out efficiently to service the development as and when it occurs.	33
11.	That the council reviews infrastructure works costs and make adjustments if any grant funding is received for infrastructure items in the plan following the adoption of the plan.	35

Figure 1.2 below illustrates the review timeline for GP3 CP.

Figure 1.2 Review timeline for GP3 CP



2 Introduction

Penrith City Council (the council) submitted Glenmore Park Stage 3 At Mulgoa Development Contributions Plan 2022 (GP3 CP) to IPART for assessment on 29 September 2023. The council is seeking to levy development contributions above the \$20,000 cap per lot/dwelling.

IPART must first review GP3 CP and provide its assessment to the Minister for Planning and Public Spaces (Minister). The Minister (or the Minister's nominee) may request 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 GP3 CP against 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.²

Our assessment of GP3 CP involved reviewing the contributions plan and supporting documentation supplied by the council, including the council's application form, works schedule, strategic studies, and consultant reports. The council relied on the key developers in the precinct, Mirvac Homes (NSW) Pty Ltd (Mirvac) and Vianello Holdings Pty Ltd (Vianello), to prepare most of the supporting documentation for the plan.

We made requests for further information from the council and received further information to assist us in assessing the plan. In our Draft Report, we also sought further information from the council to help us assess whether the plan meets the 2019 Practice Note criteria.

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

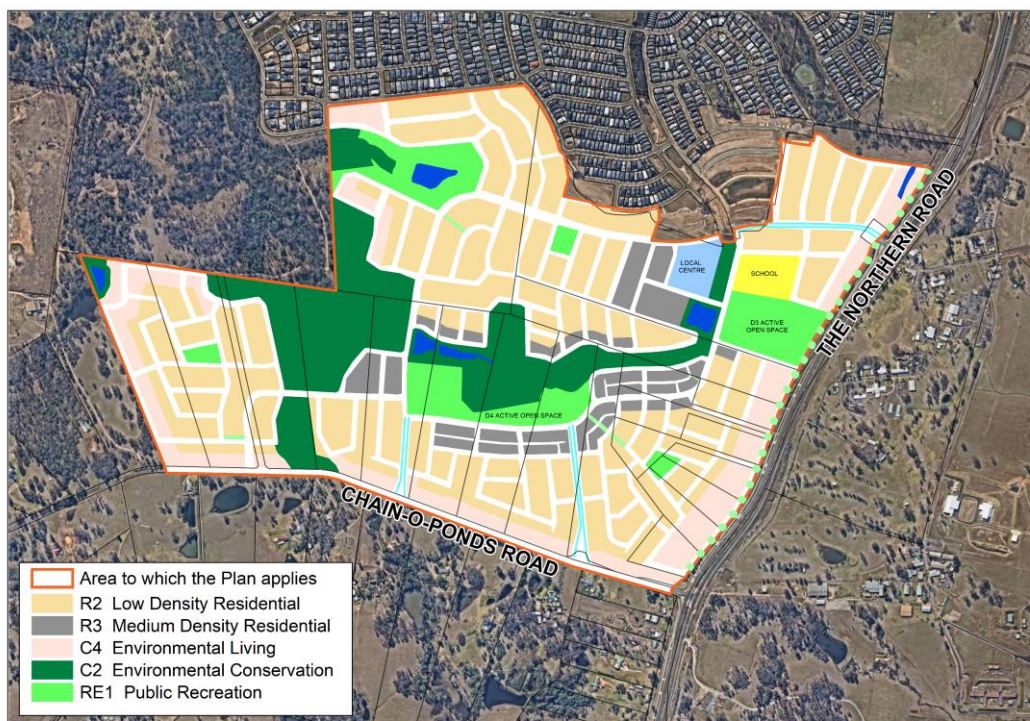
The remaining sections in this Report provide a background on the GP3 CP, our assessment of the plan, recommendations and recommended contribution rates.

3 The Glenmore Park Stage 3 Contributions Plan

3.1 The Glenmore Park Stage 3 at Mulgoa

The Glenmore Park Stage 3 release area at Mulgoa precinct (the precinct) is 206 hectares within the Penrith local government area and forms an extension of the existing Glenmore Park release area. The precinct is about 6 kms south of Penrith, within 8 kms of the new airport and Sydney Science Park. The precinct is located south to Chain-O-Ponds and west to the Northern Road (see Figure 3.1).³

Figure 3.1 Map of Glenmore Park Stage 3 at Mulgoa precinct



Source: Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 - Part 2 Technical Document, p 3.

The precinct is currently a mainly rural and rural-residential area that is proposed to undergo urban development comprising of housing, shops, school, open space, and environmental corridors.⁴

The precinct's land has been zoned for various uses to support its incoming population, including residential, traffic, transport, stormwater management, recreation and open space purposes.⁵ Most of the land within the precinct is owned by either Mirvac or Vianello.

The precinct is forecast to result in around 2,300 new dwellings to support a population increase of around 6,900 residents.⁶ Residential development will comprise a variety of types, including low and medium density dwellings, large environmental living lots and shop top and studio dwellings.⁷ Non-residential development comprises of a local centre for retail activities, a future school site, and open spaces including sports spaces and local and district parks.⁸ The council expects development to span over approximately 10 years.⁹

3.2 Contributions Plan – Glenmore Park Stage 3 precinct

To support development in the precinct, the Glenmore Park Stage 3 Development Contributions Plan (GP3 CP) levies contributions for transport and traffic management facilities, stormwater works, and open space and recreation facilities.¹⁰

The post exhibition plan was submitted to IPART for review on 29 September 2023.

3.3 Items included in GP3 CP

Through the GP3 CP, the council proposed total development contributions of \$224.7 million, which covers the land, works and plan administration items associated with the development in the precinct.¹¹

3.1.1 Stormwater works

The plan proposes to deliver about \$23.4 million worth of stormwater works items within the precinct¹² including trunk drainage, detention basins, gross pollutant traps (GPTs) and rain gardens.¹³

The full list of stormwater infrastructure items and associated costs are listed in Table 7.1.

3.1.2 Transport works

GP3 CP proposes to deliver about \$44.3 million worth of transport works items within the precinct¹⁴ including road upgrades, entry boulevards, collector roads, minor local roads and minor local perimeter roads, intersections, shared paths/cycleways and traffic marking, lighting and posting.¹⁵

The full list of transport infrastructure items and associated costs are listed in Table 7.2.

3.1.3 Open space embellishment

GP3 CP proposes almost \$49 million to embellish 7 parks, including 3 local parks and 4 district parks, and 4 linear open spaces.¹⁶ The open space embellishment items include pathways, playgrounds with playground equipment, playing fields, fitness equipment, sporting fields, picnic facilities and park furniture.¹⁷

The full list of open space infrastructure items and associated costs are listed in Table 7.3.

3.1.4 Land

GP3 CP includes almost \$106.3 million of land costs¹⁸ to acquire 42.26 hectares¹⁹. Land acquisitions are planned to allow for stormwater infrastructure, transport and traffic management and open space and recreation.²⁰

The full list of items and associated costs are listed in Table 7.4.

3.1.5 Plan administration

GP3 CP includes a plan preparation and administration cost of almost \$1.8 million.²¹ This is based on 1.5% of the total works cost.

3.1.6 Indexation

GP3 CP proposes to index works and land cost estimates to the base year of the plan using the Consumer Price Index (CPI) Sydney All Groups²² and apply CPI to the base contribution rates at the time of payment.²³

3.4 Contribution rates in GP3 CP

GP3 CP levies contributions to each development type based on the relevant apportionment of the total costs of the land, works and plan administration items required to service the development. The council has only apportioned costs to residential development.

The council's application sets out its proposed contribution rates for residential dwellings. Table 3.1 illustrates the council's proposed contributions rates for each development type.

Table 3.1 GP3 CP contributions rates (\$Jun23)

Type of development	Occupancy (persons/dwelling)	2023 proposed contribution rate (\$)
Per resident		32,574
Subdivided lot or detached dwelling	3.2	104,238
Medium density dwelling	2.5	81,436
Shop top housing dwelling	2.0	65,149
Studio dwelling	1.5	48,861
Independent living unit	1.5	48,861
Secondary dwelling	1.5	48,861

Source: Penrith City Council, GP3 CP works schedule.

4 Assessment of GP3 CP

The following sections outline our assessment of the Glenmore Park Stage 3 Development Contributions Plan 2022 (GP3 CP) from the council. It includes our assessment of each criterion, by works category against the 2019 [Practice Note](#) criteria and our recommendations.

4.1 Overview

We assessed GP3 CP against criteria in the DPHI's 2019 [Practice Note](#). For more details on our assessment approach, please see our [Information Paper](#).

We found that GP3 CP meets most of the 2019 Practice Note criteria. In Table 4.1 we present a summary of our assessment of each infrastructure category.

Table 4.1 Summary of our assessment of GP3 CP

Criteria	Stormwater	Transport	Open space	Land	Plan administration
Essential works	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Nexus	Criteria met	Criteria met	Criteria met	Criteria met	Criteria met
Reasonable costs	Criteria met	Criteria met	Criteria met	Criteria met subject to recommendation	Criteria met subject to recommendation
Apportionment	Criteria met subject to recommendation	Criteria met subject to recommendation	Criteria met	Criteria met subject to recommendation	Criteria met subject to recommendation
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		

5 Essential Works List

5.1 Stormwater

The council proposes \$23.4 million of stormwater works in GP3 CP, and almost \$5.6 million in land acquisitions.²⁴ GP3 CP stormwater works include trunk drainage, detention basins, gross pollutant traps (GPTs) and raingardens.²⁵ For the list of stormwater works, see Table 7.1. There is a land component for most stormwater infrastructure items.²⁶

Our review of the proposed stormwater infrastructure works items within GP3 CP has found that the stormwater infrastructure items are consistent with the essential works list set out in the [2019 Practice Note](#).²⁷

5.2 Transport

The council proposes \$44.3 million of transport works, and \$53.2 million in land acquisitions.²⁸ GP3 CP transport works include road upgrades, entry boulevards, collector roads, minor local roads and minor local perimeter roads, intersections, shared paths/cycleways and traffic marking, lighting and posting.²⁹ For the list of transport works, see Table 7.2. There is a land component for most transport infrastructure items.³⁰

We consider that the transport infrastructure items proposed within GP3 CP is consistent with the essential works list in the [2019 Practice Note](#).³¹

5.3 Open space

GP3 CP includes around \$49 million in open space works to embellish 3 local parks, 4 district parks and 4 linear open spaces, and an associated \$47.5 million in land acquisitions.³² For the full list of open space items, see Table 7.3. There is a land component for most open space infrastructure items.³³

The open space embellishment items in GP3 CP include pathways, playgrounds with playground equipment, playing fields, fitness equipment, sporting fields, picnic facilities, park furniture, car parking, water play, landscaping and lighting.³⁴ We consider that the open space infrastructure items proposed within GP3 CP meet the essential works list description in the [2019 Practice Note](#).³⁵

In our Draft Report, we noted that the council's application form states that Mirvac and Vianello have made an offer to dedicate the land for the linear parks (LIN1 in part, and LIN2-4) to the council at no cost as the land does not meet the essential works list in the [2019 Practice Note](#).³⁶ We sought further information from the council about whether the land and/or works meet the essential works list.³⁷ We also sought further information from the council about why 25 hectares of open space was not included when considering the provision of open space in the plan.³⁸

The [2019 Practice Note](#) states that:

The acquisition of land and the undertaking of works for environmental purposes e.g. bushland regeneration or riparian corridors are not defined as essential works for the purposes of this Practice Note.

The only exception to this is where it can be demonstrated that the land and/or works in question serve a dual purpose with one or more of the categories of works that meet the definition of essential infrastructure outlined above. In this situation, only the component of land and/or works that serves the dual purpose can be considered as essential works.³⁹

We consider that this means that if the land and/or works for the linear parks are only being used for environmental purposes, it cannot be included in a plan. However, if the land and/or works have a dual purpose both the land and/or works that meet the dual purpose can be included in the plan.

In its submission to the Draft Report, the council advised that the 25 hectares of linear parks in GP3 includes 18 hectares of conservation land under the Cumberland Plain Conservation Plan (CPCP) and 7.15 hectares of recreation land. The council also advised that the developers have committed to dedicating the land to the council. These linear parks will include active transport links throughout the precinct and to external networks, as well as retaining the land's conservation values.⁴⁰

We had some discussions with the DPHI regarding the relevant planning restrictions. The council subsequently advised that under the [Penrith Local Environmental Plan 2010](#), flood mitigation, recreation and roads are allowed with consent in areas zoned C2 – Environmental Conservation. The council advised that it is comfortable that its proposals are within the appropriate planning approvals.

In its submission to our Draft Report, the council also provided further information about the dual purpose of each of the linear parks.⁴¹

Linear Park 1 is almost 20 hectares, mostly identified as avoided land under the CPCP. It will include water cycle management facilities, a riparian corridor and open space in addition to works for environmental purposes, including tree planting. It also provides shared pathways and active transport links. We consider that this meets the Practice Note criteria for essential works as it includes uses additional to environmental purposes.

Linear Park 2 is on land identified as avoided land under the CPCP. It provides water cycle management, linear open space and active transport links in addition to works for environmental purposes such as tree planting. We consider that this meets the Practice Note criteria for essential works as it includes both environmental purposes and other essential works.

Linear Parks 3 and 4 provide shared pathways and active transport links in addition to tree canopy planting. We consider that these linear parks meet the Practice Note criteria for essential works, as it includes the dual purposes of environmental works and active transport links.

We therefore consider that the open space items in GP3 CP are consistent with the essential works list.

5.4 Land

GP3 CP includes around \$106.3 million of land costs for 42.26 hectares of land.⁴² The land acquisitions in the plan are for stormwater infrastructure, traffic and transport management and open space and recreation.⁴³ The full list of items and associated costs are in Table 7.4.

We consider that the land proposed within GP3 CP is consistent with the essential works list permitted land for open space, transport and stormwater management in the [2019 Practice Note](#).⁴⁴

5.4.1 Plan administration

GP3 CP includes about \$1.8 million for plan administration costs.⁴⁵ This is based on the IPART benchmark of 1.5% of the total works costs for stormwater, transport and local open space.

We consider that the proposed plan management and administration cost within GP3 CP is consistent with the essential works list, which allows for costs of plan preparation and administration.⁴⁶

6 Nexus

6.1 Stormwater

The council relied on the Water Cycle Management Strategy Report (April 2023), prepared by J. Wyndham Prince for Mirvac and Vianello, to establish nexus for stormwater infrastructure in the plan. The report identifies the stormwater infrastructure that is needed for development in the GP3 area. Nexus for most of the stormwater items in the plan is established through the technical study.⁴⁷

We sought further information from the council about trunk drainage items TD1 and TD2 to seek further information to establish nexus. The council clarified that the drainage infrastructure is required to facilitate the development whilst providing infrastructure to ensure the natural upstream catchment flow regime remains.

We consider that nexus is established for all stormwater items in the plan.

6.2 Transport

The council relied on Mirvac to engage The Transport Planning Partnership (TTPP) to undertake the Comprehensive Transport Impact Assessment (CTIA) (August 2022), and addendum (November 2022), to assess the demand for transport infrastructure in the precinct.

The traffic assessments clearly demonstrate nexus for upgrades of the local road network and the specific roads identified by the council.⁴⁸ We requested information from the council on how it determined the road lengths and widths for these items.⁴⁹ The council advised that while the details of these items were not in the planning proposal's supporting studies, the parameters were informed by several factors including:

- road profiles within Glenmore Park Stage 2
- local topography (as high as 40m in some areas) identified in the *Visual Impact Assessment*
- the CPCP which has identified areas of high biodiversity not suitable for development
- input from external bodies such as the NSW Rural Fire Service
- DPHI's requirement that a 40% tree canopy target be achieved for Greater Sydney.⁵⁰

We note that the council has planned its road parameters based on the needs identified by the CTIA, as well as other considerations relevant to the context of the precinct. We consider that this establishes nexus for the transport items in the plan.

6.3 Open space

Currently there is no existing open space infrastructure within the precinct. The council relied on the *Social Impact and Infrastructure Assessment* (April 2022), prepared by Elton Consulting (now WSP) for Mirvac, and the *Public Domain and Open Space Strategy* (PDOSS) (January 2023), prepared by GLN Planning for Mirvac and Vianello, to establish the need for open space in the precinct.

The PDOSS notes that the precinct will have a provision of about 3.19 hectares of open space per 1,000 residents.⁵¹ This excludes the 25 hectares of land for linear parks and environmental corridors, which is primarily within the CPCP.⁵² If the 25 hectares of land were included, the provision of open space is 6.79 hectares of open space per 1000 residents.⁵³

While this is significantly higher than the Growth Centres Development Code benchmark of 2.83 hectares per 1,000 residents, we have previously assessed plans with a higher provision of open space as reasonable where there is a higher provision of open space in the local government area more broadly. For example, the [Campbelltown City Council's Menangle Park Contributions Plan 2018 \(Menangle Park CP\)](#), with 3.19 hectares per 1,000 residents, which we assessed as reasonable.⁵⁴

The *Penrith Sport and Recreation Strategy* (March 2020) indicates that the Penrith local government area has around 5 hectares per 1,000 people, with some precincts within the local government area having a higher ratio.⁵⁵

We have also considered that the PDOSS assessed the provision of open space facilities in the plan against the performance-based benchmarks in the *Draft Greener Places Design Guide*⁵⁶, the *Penrith Sport and Recreation Strategy*⁵⁷ and the Master Plan for the precinct⁵⁸ to support the provision of different types of open space in the precinct (see Table 7.3 below).

We consider that the nexus for open space is established through the supporting documentation provided by the council.

6.4 Plan administration

GP3 CP includes plan administration costs to cover the council's costs to prepare and review contributions plans, account for contributions receipts and expenditure, and coordinate the implementation of works.⁵⁹

The plan administration component 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. Plan administration will also cover the costs of council engaging legal professionals to provide advice on implementing the plan.⁶⁰

As these costs arise directly because of the development, we consider that this establishes nexus for plan administration costs.

7 Reasonable Cost

7.1 Stormwater works

We consider that the costs for stormwater management works in GP3 CP are reasonable for this stage of the plan. The costs for stormwater management works in GP3 CP are shown in Table 7.1 below.

Table 7.1 Costs for stormwater works in GP3 CP (\$Jun23)

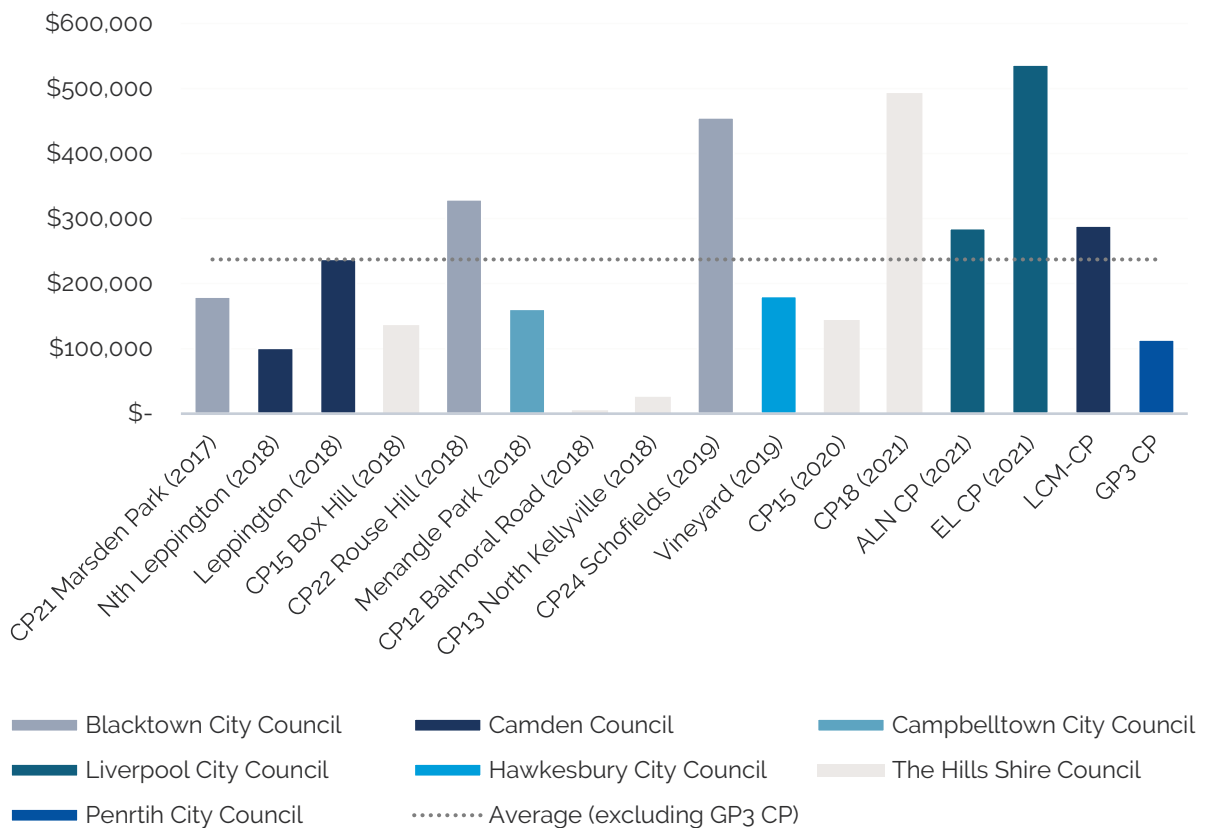
ID	Description	Cost (\$)
Trunk Drainage		
TD1	Trunk Drainage 1 - Chain-O-Ponds Rd (East)	928,439
TD2	Trunk Drainage 2 - Chain-O-Ponds Rd (West)	1,553,324
TD3	Trunk Drainage 3 - Piped Diversion (West) - Costs included in RGD	-
Detention Basins		
VB1	Detention Basin as required by the underlying SWMP for GP3 (GPT incl with RG J)	1,365,592
MB1	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	1,348,599
VB2	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	1,632,364
MB3	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	874,225
VB4	Detention Basin as required by the underlying SWMP for GP3 (GPT incl with RG K)	1,839,096
MB4	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	675,016
MB5	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	791,102
Raingardens		
RG A	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	1,463,113
RG B	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	355,054
RG C	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	2,552,470
RG D	Rain Garden as required by underlying SWMP for GP3 (incl GPT and TD3)	1,509,499
RG E	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	1,767,774
RG F	Rain Garden as required by underlying SWMP for GP3 (NO GPT)	95,591
RG G	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	534,807
RG H	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	881,104
RG J	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	574,439
RG K	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	2,695,560
Total		23,437,167

Source: Penrith City Council, GP3 CP, works schedule.

We have compared the overall stormwater costs for GP3 CP to other plans we have assessed and assessed individual stormwater works items.

Overall, stormwater works in GP3 CP of \$113,773 per hectare of net developable area are within the comparable range to other plans we have assessed (Figure 7.1).

Figure 7.1 Stormwater works costs per hectare of net developable land (\$Jun23)



Source: IPART analysis

We also assessed individual stormwater works costs. The council relied on preliminary cost estimates prepared by J. Wyndham Prince for Mirvac, based on the water management strategy, indexed to the base date of the plan (June 2023).⁶¹

We consider the costs of trunk drainage lines and gross pollutant traps are reasonable when compared to our 2014 benchmark costs (after being indexed to the base date of the plan). The costs of raingardens in the plan are also reasonable, as they are comparable with the cost of raingardens in other plans we have assessed as reasonable.

The cost of three detention basins, VB1, VB2, and MB3, are about half the cost of comparable detention basins we have assessed as reasonable in other plans. We clarified with the council that each detention basin site has unique constraints and existing topography which require varying levels of site establishment and earthworks to deliver the required detention basin volumes. VB2 and MB3 also cost lower than other basins because, due to their location near existing dams, they have comparatively lower earthworks costs. On this basis, we consider the costs of these three detention basins as reasonable.

The contingency and professional fee allowances are reasonable based on our 2014 benchmarks.⁶²

7.2 Transport

We have determined that the costs for transport works in GP3 CP are reasonable for this stage of the plan. The costs for transport works in GP3 CP are shown in Table 7.2 below.

Table 7.2 Costs for transport works in GP3 CP (\$Jun23)

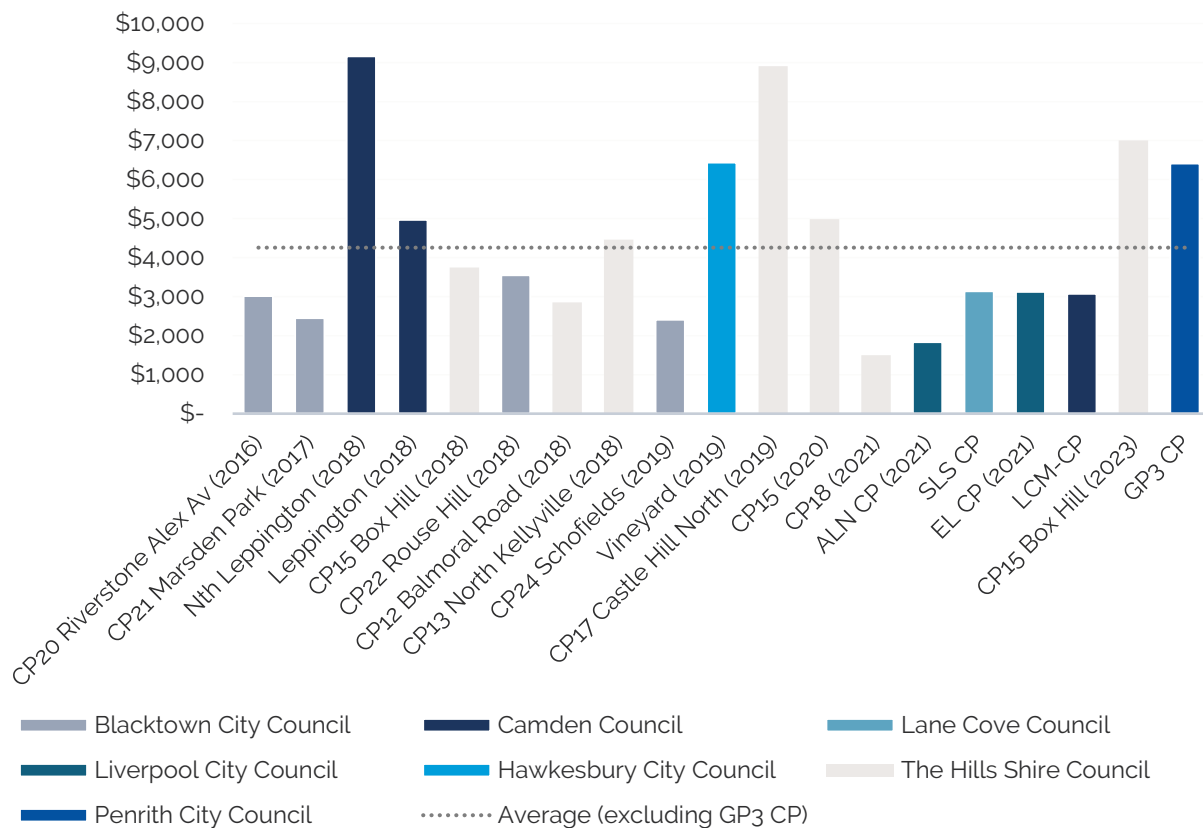
ID	Description	Cost (\$)
Road Hierarchy		
T1.1	Chain-O-Ponds Road Upgrade	3,414,750
T1.2	Chain-O-Ponds Road East Upgrade	1,158,125
T2.1	Entry Boulevard (Chain O Ponds Road)	3,393,000
T2.2	Entry Boulevard (The Northern Road Road)	3,020,713
T3.1	Collector Road with median	2,656,463
T3.2	Collector Road (adjacent to development on both sides)	6,076,763
T3.3	Collector Road (adjacent to bushfire hazard/Active District Park/District Park 1)	5,503,988
T3.4	Collector Road (adjacent to bushfire hazard/District Park 2/Linear Parks)	1,818,300
T3.5	Collector Road (At Glenmore Park Stage 2 Boundary)	143,250
T4.1	Minor Local Road (adjacent to stormwater/District open space on one side)	639,400
T4.2a	Minor Local Perimeter Road (adjacent to stormwater/District open space on one side) - OPTION A	-
T4.2b	Minor Local Perimeter Road (adjacent to stormwater/District open space on one side) - OPTION B	2,575,01
T4.3	Minor Local Perimeter Road (adjacent to bushfire hazard/District Park 1 & 2)	1,797,750
T4.4	Minor Local Road (adjacent to Local Park/District Park 3)	1,722,700
T5	Minor Local Road (The Northern Road Interface)	1,048,500
Intersections		
INT1	Chain-O-Ponds Road/Entry Boulevard (East)	2,791,174
INT2	Chain-O-Ponds Road/Entry Boulevard (West)	2,495,620
INT3	Chain-O-Ponds Road/Collector Road	2,589,832
INT4	Collector Road/Collector Road (Vianello land)	654,962
INT5	Collector Road/Entry Boulevard (Vianello Land)	755,895
Total		44,256,195

Source: Penrith City Council, GP3 CP, works schedule.

The total proposed cost for transport works is about \$44.3 million (about 20% of the total costs of the plan).⁶³

To assess the reasonableness of transport works costs, we compared the transport works cost to other plans we have previously assessed and individually assessed transport works items. Overall, transport works costs of \$6,416 per person is comparable with other plans we have previously assessed (Figure 7.2).

Figure 7.2 Transport works costs per person (\$Jun23)



Source: IPART analysis

For individual transport works, the council relied on Mirvac to engage ADW Johnson for transport works costs estimates and designs.⁶⁴ The council clarified that the cost estimates were informed by a pool of contractor rates within the south-west Sydney area and verified against known site conditions at the time of preparing the plan. These costs have been indexed to the base date of the plan (June 2023).

We consider that the costs for transport works items T1.1, T.1.2, T4.1, T4.2b, T4.3, T4.4, T5, and INT1-5 are reasonable after comparing them to similar items in other plans we have assessed. We also consider that the costs for entry boulevards (T2.1 and T2.2) are reasonable based on similar items from our [2014 benchmarks](#) (indexed to the base level of the plan) and compared to like items in past plans we have assessed. Transport items are generally well planned, and detail was provided regarding road parameters and cost breakdowns.

The professional fee allowances are reasonable, based on IPART's 2014 benchmarks.

In our Draft Report, we sought comment from the council on the cost of transport items T3.1 – T3.5 which, compared to similar benchmarks, appeared 30-50% lower than benchmark costs and, compared to similar items from past CPs, appeared 20-45% lower.⁶⁵

The council's submission to our Draft Report noted that our Guidelines for Contributions Plans (8 October 2018) states that we prefer that "...councils use the best available information to estimate the cost of the necessary local infrastructure. This will generally involve preparing or commissioning independent advice on estimates specific to each plan or relying on such advice prepared during precinct planning." The council noted that ADW Johnson was engaged by Mirvac to prepare detailed costings for transport items and that ADW Johnson verified the rates for adequacy against known site conditions at the time of preparing the GP3 CP. In its submission to our Draft Report, Mirvac stated that it is confident that the costs of these transport items have been estimated accurately.⁶⁶

We acknowledge that detailed costings have been used to determine the costs of these items. While we note that these costs are low in comparison to other benchmarks, we accept that they are based on comprehensive costings, and we therefore consider the costs are reasonable. To ensure this remains the case, we recommend that the council regularly review the costs of infrastructure items to ensure that the costs remain reasonable over the life of the development.

Recommendations

1. That the council regularly review the costs of infrastructure items in the contributions plan over the life of the development.

7.3 Open space

The costs for open space embellishment works for GP3 CP are shown in Table 7.3 below.

Table 7.3 Costs for open space works in GP3 CP (\$Jun23)

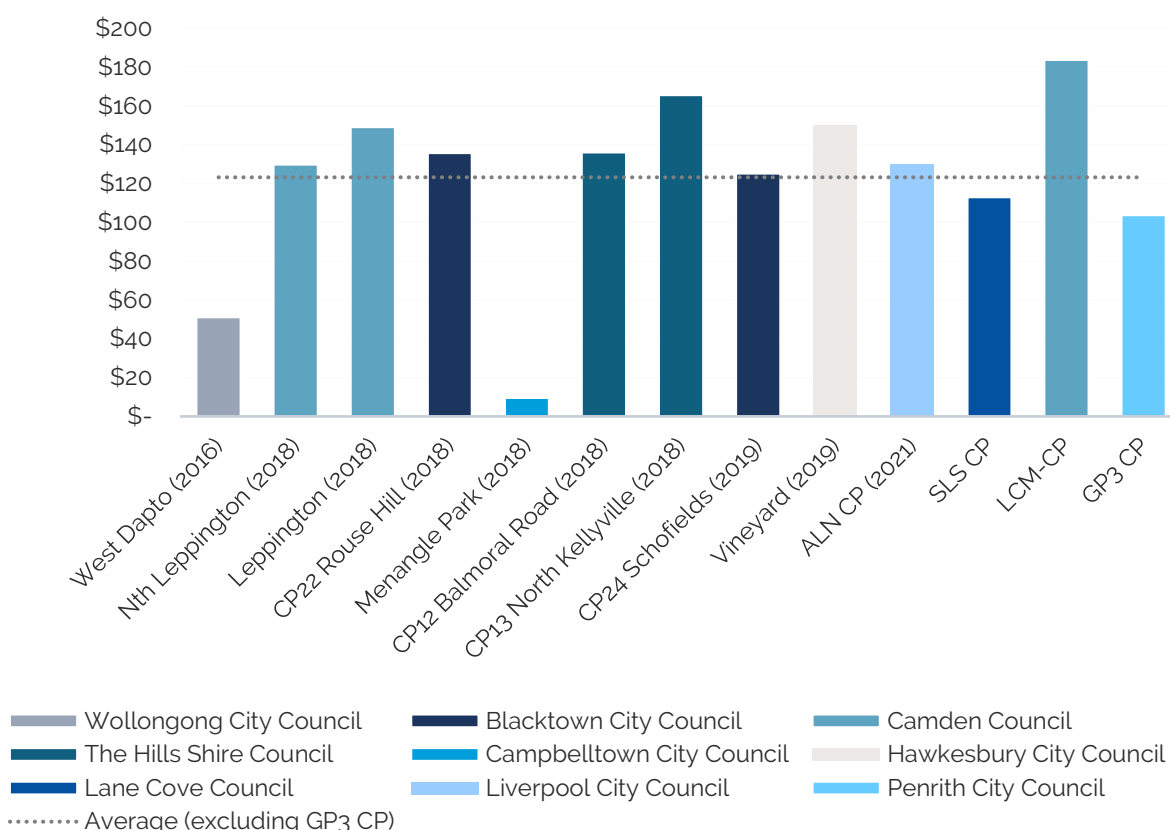
ID	Description	Cost (\$)
Local Parks		
L1	Local Park 1	1,339,276
L2	Local Park 2	1,099,223
L3	Local Park 3	1,079,245
District Parks		
D1	District Park 1	3,657,815
D2	District Park 2	3,143,271
D3	District Park 3	13,628,384
D4	District Park 4	15,206,145
Linear Open Space		
LIN1	Linear Open Space 1	6,895,131
LIN2	Linear Open Space 2	1,124,028
LIN3	Linear Open Space 3	1,502,350
LIN4	Linear Open Space 4	311,732
Total		48,986,598

Source: Penrith City Council, GP3 CP, works schedule.

The total proposed cost of open space embellishment works in GP3 CP is about \$49 million (22% of the total costs of the plan).⁶⁷

We have assessed both the overall open space embellishment works cost to other plans we have assessed and individual open space embellishment items. Overall, open space works costs in GP3 CP of \$104 per square metre of open space is within range and similar to other plans we have assessed (Figure 7.3).

Figure 7.3 Open space embellishment works costs per square metre of open space (\$Jun23)



Source: IPART analysis

We also considered and assessed the cost estimates relied on by council for open space embellishment costs. The council relied on cost estimates prepared by Sturt Noble Associates for Mirvac and Vianello, which were based on concept design plans and opinions of probable cost based on the open space strategy.⁶⁸ These costs have been indexed to the base date of the plan (June 2023).

The professional fee allowance is reasonable, based on IPART's [2014 benchmarks](#).

Our assessment of open space embellishment works items indicates that the costs are reasonable, although some costs appear to be low.

We consider that the cost of local parks (L1-L3) and active district parks 3 and 4 (D3-D4) are within range to DPPI's [Framework for Valuing Green Infrastructure and Public Spaces 2022 benchmarks](#)⁶⁹ (DPPI's 2022 benchmarks) and the costs are similar to other items in plans that we have assessed as reasonable.

We sought further information from the council to support the cost estimates of passive district parks 1 and 2 (D1-D2) as they are significantly below [DPHI's 2022 benchmarks](#) and other similar items we have assessed in other plans. The council clarified that the lower cost estimates are due to a lower level of embellishment for passive recreation. The council clarified that D1 and D2 include stormwater related works, such as detention basins, and that these works are included in the stormwater costs (VB2, RGA and RGB) rather than the open space costs in the plan. Based on this information, we consider the costs of D1 and D2 to be reasonable.

We also sought further information from the council about linear open spaces (LIN1-LIN3) as the costs are low in comparison to similar items we have previously assessed. The council clarified the lower cost estimates is due to lower levels of embellishment, and the nature of the linear parks is to provide additional green links between other parks. In addition, LIN1-LIN3 benefit from existing vegetation, reducing the soft scaping costs, which differs from LIN4, which does not contain as much existing vegetation. Based on the additional information provided by the council, we consider the costs for LIN1-3 are reasonable.

7.4 Land

GP3 CP includes around \$106.3 million of land costs for 42.26 hectares of land. The full list of items and associated costs are in Table 7.4.

Table 7.4 Costs for land in GP3 CP (\$Jun23)

ID	Description of land	Land size (sqm)	Cost (\$)
Stormwater			
Trunk Drainage			
TD1	Trunk Drainage 1 - Chain-O-Ponds Rd (East)	N/A	-
TD2	Trunk Drainage 2 - Chain-O-Ponds Rd (West)	N/A	-
TD3	Trunk Drainage 3 - Piped Diversion (West)	N/A	-
Detention Basins			
VB1	Detention Basin as required by the underlying SWMP for GP3 (GPT incl with RG J)	14,619	4,604,985
MB1	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	7,794	81,837
VB2	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	23,334	-
MB3	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	13,587	142,664
VB4	Detention Basin as required by the underlying SWMP for GP3 (GPT incl with RG K)	9,686	101,703
MB4	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	10,898	114,429
MB5	Detention Basin as required by the underlying SWMP for GP3 (incl GPT)	10,193	107,027
Raingardens			
RG A	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	4,397	-
RG B	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	1,470	-
RG C	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	7,245	76,073
RG D	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	3,126	246,173
RG E	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	4,508	-

ID	Description of land	Land size (sqm)	Cost (\$)
RG F	Rain Garden as required by underlying SWMP for GP3 (NO GPT)	800	8,400
RG G	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	1,918	20,139
RG H	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	2,460	25,830
RG J	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	2,278	23,919
RG K	Rain Garden as required by underlying SWMP for GP3 (incl GPT)	9,686	-
Stormwater subtotal		127,999	5,553,177
Transport			
Road Hierarchy Works			
T1.1	Chain-O-Ponds Road Upgrade	0	-
T1.2	Chain-O-Ponds Road East Upgrade	0	-
T2.1	Entry Boulevard (Chain O Ponds Road)	11,136	4,092,480
T2.2	Entry Boulevard (The Northern Road Road)	9,802	5,660,655
T3.1	Collector Road with median	11,019	4,049,630
T3.2	Collector Road (adjacent to development on both sides)	25,730	9,455,628
T3.3	Collector Road (adjacent to bushfire hazard/Active District Park/District Park 1)	21,591	7,934,840
T3.4	Collector Road (adjacent to bushfire hazard/District Park 2/Linear Parks)	6,977	4,479,106
T3.5	Collector Road (At Glenmore Park Stage 2 Boundary)	588	216,090
T4.1	Minor Local Road (adjacent to stormwater/District open space on one side)	2,870	-
T4.2a	Minor Local Perimeter Road (adjacent to stormwater/District open space on one side) - OPTION A	0	-
T4.2b	Minor Local Perimeter Road (adjacent to stormwater/District open space on one side) - OPTION B	10,958	-
T4.3	Minor Local Perimeter Road (adjacent to bushfire hazard/District Park 1 & 2)	8,925	-
T4.4	Minor Local Road (adjacent to Local Park/District Park 3)	8,243	4,760,448
T5	Minor Local Road (The Northern Road Interface)	4,369	2,522,953
Intersections			
INT1	Chain-O-Ponds Road/Entry Boulevard (East)	5,577	3,220,718
INT2	Chain-O-Ponds Road/Entry Boulevard (West)	1,924	1,111,110
INT3	Chain-O-Ponds Road/Collector Road	2,266	1,931,765
INT4	Collector Road/Collector Road (Vianello land)	2,784	1,615,416
INT5	Collector Road/Entry Boulevard (Vianello Land)	3,694	2,133,285
Transport subtotal		138,453	53,184,122
Open space			
Local Parks			
L1	Local Park 1	5,087	2,937,743
L2	Local Park 2	5,007	2,891,543
L3	Local Park 3	5,166	2,983,365
District Parks			
D1	District Park 1	67,821	3,133,330
D2	District Park 2	35,709	374,945

ID	Description of land	Land size (sqm)	Cost (\$)
D3	District Park 3	49,636	18,241,230
D4	District Park 4	53,866	16,967,790
Linear Open Space			
LIN1	Linear Open Space 1	198,873	-
LIN2	Linear Open Space 2	32,284	-
LIN3	Linear Open Space 3	17,548	-
LIN4	Linear Open Space 4	1,416	-
Open space subtotal		472,413	47,529,945
Total		422,596	106,267,244

Note: total land size provided does not equate individual item land total as the land acquisition for some items is covered by other items.
⁷⁰Source: Penrith City Council, GP3 CP, works schedule and Penrith City Council, Second RFI response for GP3 (Part 1 of 3), 9 April 2024.

The council engaged Deloitte directly to prepare a Summary Cost Rates for Glenmore Park Stage 3 Report (September 2023).⁷¹ The report provides average cost estimates for underlying land zones in the precinct. The council adopted Deloitte's average cost rates to estimate land acquisition costs in the plan (see Table 7.5 below).

Table 7.5 Land acquisition cost rates per sqm for GP3 CP (\$Sep23)

Land zoning	<10,000 sqm	>10,000 sqm	>20,000 sqm	>50,000 sqm
C2 Environmental Conservation	10	10	10	10
R2 Low Density Residential	550	400	350	300
R3 Medium Density Residential	1,000	800	600	400
RE1 Public Recreation	300	250	200	150
C4 Environmental Living	350	300	250	150
SP2 Infrastructure	400	350	300	200

Source: Deloitte, Penrith City Council Summary Cost Rates for Glenmore Park Stage 3, September 2023, p 23.

The council has not acquired any land and does not own any operational land within the precinct. Two major developers in the precinct (Mirvac and Vianello) have offered to dedicate land for the linear parks in the precinct.⁷²

The cost rates in the land valuation report were estimated based on analysis of relevant sales evidence, using a direct comparison approach. This included analysing sales within the local precinct area, and the wider Sydney region where there were limited recent sales data in the local precinct.⁷³ We consider the approach to estimating land acquisition costs for GP3 CP as reasonable.

We have also considered the rates applied to specific land acquisitions in the plan. We clarified with the council that basis for the rates used for costs of land for D1 and RGD. The council provided further information that the rates used were reflective of the underlying zoning of the land and specific factors of the land.

In our Draft Report, we also sought further information about whether the underlying zoning for transport items T2.2, T3.4, T4.4 and T5 could be used to determine the land value, as these items appeared across different land zones.⁷⁴ The council's submission noted these items traverse different land use zones and that they sought to apply the rate of the zone the item was predominantly in, due to difficulties in determining exact portions of each road within each zone. The council also noted the exact location of each road could move as detailed designs are developed.⁷⁵ We consider that this approach is reasonable at this stage of the plan. The council requested the C4 rate be applied to T5.

Recommendations



2. That the council update the underlying zoning to the C4 rate for transport land item T5.

We also sought clarification about why the rates used in the work schedule to value C2 environmental conservation land differs from the valuation report, and why the rate of \$10 per square metres for many stormwater land items that appear to be under 1 hectare in size differs from the value used valuation report. The council advised that the rate was based on a comparison and review of a previous land valuation received, and the constrained nature of the C2 zoned land under the provisions of the CPCP.⁷⁶ The council provided this previous valuation by Cushman and Wakefield to IPART. We reviewed this valuation and noted that relevant land rates were valued higher than the Deloitte land valuation report (submitted with the CP) for all land sizes. We therefore consider using the highest land cost for C2 land provided by Deloitte for all C2 land sizes as reasonable.

7.4.1 Land acquisition disturbance allowances

The council's application form states that it has applied a 5% rate for 'land acquisition disturbance' allowance for land in the plan. In our Draft Report, we sought further information from the council about the methodology used to determine the land acquisition disturbance allowance.⁷⁷

The council clarified that the 5% is intended to cover compensation, stamp duty and legal fees for land acquisition. The basis for this amount was a recommendation in a land valuation report provided by Mirvac. The land valuation report was not otherwise relied upon for land valuations as the council sought a review of the report to mitigate any potential financial risk to the council and verify the land valuations provided.⁷⁸

Based on the additional information provided in the submissions to the Draft Report and further information we received from the council, we accept that the land acquisition disturbance allowance is reasonable.

7.5 Plan administration

GP3 CP includes about \$1.8 million for plan management and administration costs. This is based on the IPART 1.5% benchmark of the total works costs for stormwater, transport and local open space.⁷⁹ We consider this approach is reasonable, and we note that it is similar to the approach taken in other plans.

As we have made other recommendations that will change the total cost of the plan, we recommend that the council update its plan administration costs to equate to 1.5% of the revised total cost of works.

Recommendations

- 3. That the council update the cost of plan administration to be 1.5% of the revised total works costs.

7.6 Other matters

7.6.1 Contingency allowance for transport works and open space embellishment works

Our [2014 benchmarks](#) recognise that infrastructure projects involve uncertainty across the planning, design and delivery stages, and this uncertainty is usually accounted for in cost estimates by including an appropriate contingency allowance. The use of an appropriate level of contingency allowance covers a variety of unforeseen events, including (but not limited to) site contamination, spikes in demand for labour and interruptions to supply.⁸⁰

More broadly, councils are also required to consider the financial risks when developing a contribution plan. The [2005 Practice Notes](#), which must be read in conjunction with the [2019 Practice Note](#), outline that a key risk in the contributions system framework is that capital costs of works estimates in a development contributions plan can be underestimated.⁸¹

For transport works, a contingency allowance of 10% has been applied to most items and 20% applied for items INT1-5. For stormwater works, 30% contingency allowance for stormwater works items and 25% for MB1, VB2, MB3, MB4, and MB5.⁸² For open space embellishment works items, a 10% contingency allowance has been applied.

Dependent on the project stage, our [2014 benchmarks](#) for contingency allowances allow for:

- a. stormwater works, 30% for the strategic review stage or 20% for the business case stage
- b. transport works, 30% for the strategic review stage or 20% for the business case stage
- c. open space embellishment, 20% for the strategic review stage or 15% for the business case stage.⁸³

The council's application form states that the higher contingency allowance has been used, as it represents the concept level nature of the designs and allows for an appropriate contingency for detailed design. We consider that the use of 30% contingency allowance for most stormwater items is reasonable, and we recommend that the contingency allowance be increased from 25% to 30% for stormwater works items MB1, VB2, MB3, MB4, and MB5.

For transport works, the council's application form indicates that the costs are based on high level designs by ADW Johnson, and the costs were prepared without design work being undertaken. For open space embellishment works items, the council has prepared detailed design costings. We recommend that the council use a higher contingency allowance for transport and open space embellishment works.

Recommendations

4. That the council use the following contingency allowances:
 - a. 30% for MB1, VB2, MB3, MB4 and MB5 stormwater works items
 - b. 20% for transport works
 - c. 15% for open space embellishment works.

7.6.2 Adjustments of costs in the work schedule

We have identified that adjustments will need to be made for some costs in the works schedule. These include:

- overestimate in some transport works costs – the base cost has included the contingency allowance for items INT1-5 leading to an overestimate in the professional fee in the total cost for each item.
- adjustment to transport and land costs – the CPI index figures have been updated for transport and land costs to reflect the September 2023 indexed value. This has led to a reduction in these costs when indexed to the base period of the plan.
- overestimate of some transport items' land disturbance allowance costs – the work schedule for T3.4 and INT4 have a 7% land disturbance allowance applied, and item INT3 has a 55% rate applied. These have been corrected for a 5% land disturbance allowance consistent with other transport land items.
- adjustment of the zoning rate for T2.1, T3.1, T3.4, and T3.5 – the work schedule uses the Residential R2 and Residential R3 (>20,000 square metre) rates per unit to calculate the costs for transport items T2.1, T3.1, T3.4, and T3.5, which have areas less than 20,000 square metres. These rates have been adjusted for using the appropriate rates from the Deloitte land valuation report for relevant land size. T2.1 and T3.1 have been adjusted to use the R2 (>10,000 square metre) rate, T3.4 to use the R3 (<10,000 square metre) rate, and T3.5 to use the R2 (<10,000 square metre) rate.

We recommend that the council make the adjustments to the work schedule, and these adjustments are reflected in the recommended contribution rates for residential development in Table 12.1, Table 12.2 and Table 12.3.

Recommendations

5. That the council adjust the work schedule for residential development to:
 - a. remove the contingency allowance from the base cost of the land for INT1-5
 - b. update the CPI values for transport works and land costs to reflect the September 2023 indexed value.
 - c. to reduce the land disturbance allowance for transport land items T3.4, INT4 and INT3 to 5%.
 - d. adjust T2.1 and T3.1 to use the R2 (>10,000 square metre) rate, T3.4 to use the R3 (<10,000 square metre) rate, and T3.5 to use the R2 (<10,000 square metre) rate from the land valuation report.

8 Apportionment

8.1 Stormwater

The council has only apportioned the stormwater costs in GP3 CP to residential development.⁸⁴ The council states that development for the sole purpose of non-residential use will be subject to the council's Section 7.12 City-Wide Development Contributions Plan for Non-Residential Development (October 2021) (Section 7.12 CP) which covers Glenmore Park.⁸⁵ However, it is not apparent that stormwater costs in the GP3 CP have been apportioned to the Section 7.12 CP.

The council has apportioned stormwater costs on a per-person basis, at the same rate across all residential development types on the basis that it simplifies the conversion to a per dwelling rate.⁸⁶ The council clarified that this was due to GP3 CP only applying to residential development and that this is the best option as lot sizes may vary throughout the plan.

We consider that, because non-residential development represents approximately 2% of total net developable area (NDA), 2% of stormwater costs should be attributable to non-residential development. We do not consider 100% apportionment of stormwater costs to residential development is reasonable. We therefore recommend that the council apportion stormwater costs on a per hectare of NDA basis for non-residential development.

In relation to the primary school site, ideally, the NSW Department of Education would pay relevant contributions as an 'impactor' and 'beneficiary', however we note that it is typically not possible for councils to secure contributions from the NSW Department of Education. We consider there is a case to spread the costs of the local infrastructure required across residential development. We recommend that the land for state schools be included in the residential NDA, and stormwater costs be apportioned to residential development on a per person basis.

Noting that the council has stated that development for the sole purpose of non-residential use will be subject to the council's Section 7.12 CP, which covers Glenmore Park, we also recommend that the council ensure that it does not recover contributions for the same infrastructure items under both GP3 CP and the Section 7.12 CP.

8.2 Transport

The plan apportions transport costs to the residential population only and not to the proposed local shops or school. The plan apportions transport costs by dividing the total costs by the proposed new residential population. To calculate the transport rate per dwelling, the per person rate is multiplied by the assumed occupancy rate of the residential development.⁸⁷

The council states that transport costs have not been apportioned to non-residential development because the transport works will primarily attract local trips by private car, public transport and by linked active transport routes.⁸⁸

As noted above, non-residential development accounts for around 2% of the GP3 CP, however none of the infrastructure costs are apportioned to non-residential development. We do not consider that 100% apportionment of transport items to residential development is reasonable.

We therefore recommend that council also apportion transport costs to non-residential development on a per hectare of NDA basis for non-residential development.

Recommendations

- 6. That the council apportion transport and stormwater costs to residential development on a per-person basis and to non-residential development on a per hectare of NDA basis.
- 7. That the council apportion transport and stormwater land and works costs for the public school site to residential development.
- 8. That the council ensures that it does not recover contributions for the same infrastructure items through both GP3 CP and the council's Section 7.12 City Wide Development Contributions Plan for Non-Residential Development.

8.3 Open space

GP3 CP apportions the cost of open space land and infrastructure to residential development on a per person basis.⁸⁹ The council states that the need to provide open space is generated by the residential development of the precinct⁹⁰ and confirmed that there is no demand generated from outside the precinct for open space within the area. This approach is consistent to apportionment of open space items in other plans we have assessed, and we consider this is reasonable.

8.4 Plan administration

The plan uses the IPART benchmark of 1.5% for plan administration. GP3 CP apportions the cost for plan administration to residential development on a per-person and per-dwelling/lot basis.⁹¹ The council noted that administrative costs are not apportioned to non-residential development as non-residential development will be subject to the Section 7.12 CP.

As we outlined above, it is not clear that the costs of transport and stormwater infrastructure have been apportioned to the Section 7.12 CP and these costs appear to be apportioned entirely to the residential development in GP3 CP.

Given we are recommending that transport and stormwater costs be apportioned to non-residential development, we also recommend that the costs of plan administration be apportioned proportionally to non-residential development.

Recommendations

- 9. That the council apportion plan administration costs for transport and stormwater to non-residential development.

9 Timing

We must assess whether the proposed amenities and services can be provided in a reasonable timeframe.

The GP3 CP indicates a development timeframe of 8 years, with staging and priority infrastructure generally occurring in line with development in the area. Development is likely to progress from the Entry Boulevards at Chain-O-Ponds Road and The Northern Road, and future subdivisions will expand out from these works. The council has noted that the timing and location of these works is indicative and may be subject to change based on the conditions at the time.⁹² The stages are set out below in Table 9.1.

Table 9.1 GP3 CP indicative staging plan

Stage	Number of lots	Delivery forecast
Mirvac site		
Stage A	486	0-3 years
Stage B	307	3-6 years
Stage C	236	3-6 years
Stage D	215	5-7 years
Subtotal	1244	
Vianello site		
Precinct E	435	0-6 years
Precinct F	180	0-5 years
Precinct G	319	2-8 years
Subtotal	934	
Total	2178	

Source: ADW Johnson Pty Ltd, Mulgoa – Sect 7.11 Delivery Program Sheet 1.

The council intends to deliver most of the infrastructure in GP3 CP, on the land held by Vianello and Mirvac, within the next 3-5 years, and within 8 years. A minority of development within GP3 CP is to be delivered by other developers, and open space items (L2, D2, and LIN1) will be delivered subject to the land being acquired by the council and funds being available.⁹³

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 specifies the likely timing for the provision of infrastructure, based on the anticipated receipt of contributions and the satisfaction of the demands of the population.⁹⁴

The 2005 Practice Notes outlines the importance of timing, because the timing of contributions and the timing of expenditure on works and land acquisition are high risk factors in a contributions plan. Any changes to the assumption of timing of works and land acquisition have the potential to impact cashflow. The 2005 Practice Note outlines that councils should review the delivery of infrastructure in the plan regularly.⁹⁵

In our Draft Report, we recommended that the council, after consultation with Mirvac and Vianello (and other developers where relevant), include an indicative infrastructure delivery schedule for individual infrastructure item in the plan, linked to the stages of development within the precinct. The council and developers have provided additional information about the staging of the development. We are recommending that the council regularly review the work schedule to ensure infrastructure is rolled out efficiently to service the development as and when it occurs.

Recommendations

10. That the council regularly review the work schedule to ensure infrastructure is rolled out efficiently to service the development as and when it occurs.

10 Community liaison and publicity

We have determined that the council's community liaison and consultation process meets the Practice Note requirements, which is that the council is to conduct appropriate community liaison and publicity in preparing the contributions plan.⁹⁶

The council's application states that they consulted with the community on the plan, exhibiting it alongside the planning proposal, draft Development Control Plan, and Planning Agreement, for 28-days between 19 August 2022 to 16 September 2022.⁹⁷

The council minutes indicates that the plan, and supporting information, was available to view online on Council's Your Say Penrith website, at Council's Civic Centre, Penrith Library and St Marys Library, and on the NSW Planning Portal. The exhibition was advertised in the Western Weekender throughout the public exhibition period. Written notification of the public exhibition was given to landowners and occupiers of 73 properties that form part of the area or are on nearby or adjoining properties.⁹⁸

The council considered submissions and incorporated post-exhibition amendments in response to the submissions received.⁹⁹ These amendments were made prior to submitting GP3 CP to IPART for review.¹⁰⁰

11 Other matters

11.1 Grant Funding

In recent reviews of contribution plans, we have considered the possibility of the council receiving grants for items included in the CP following the adoption of the CP. To account for this possibility, we have recommended in other plans that the council review costs and make adjustments for any grant funding received following the adoption of the plan. Councils can reduce the total cost of the CP without needing to seek a further review by IPART.

We are intending to apply this approach to all CPs to ensure that any grant funding that is received after the CP is adopted prompts the council to reduce the rebates accordingly.

Recommendations

- 11. That the council reviews infrastructure works costs and make adjustments if any grant funding is received for infrastructure items in the plan following the adoption of the plan.

11.2 Indexation

The indexation approach in GP3 CP is similar to other plans we have assessed, and we consider it reasonable.

Where works and land 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 the ABS All Groups – Sydney Consumer Price Index (CPI).¹⁰¹

GP3 CP applies the ABS All Groups – Sydney Consumer Price Index (CPI) to the base contribution rates at the time of payment.¹⁰²

11.3 Assessment against clause 212 of the EP&A Regulation

We have determined that GP3 CP contains the information required by clause 212 of the Environmental Planning and Assessment Regulation 2021. 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 GP3 CP against the EP&A Regulation is provided in Table 11.1.

Table 11.1 Assessment against clause 212 of the EP&A Regulation

Subclause	Requirement	Location in CP
1(a)	Purpose of the plan.	Section 2.1.2
1(b)	Land to which the plan applies.	Section 2.1.5 and Figure 2 in section 1.2
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 1.2 and Section 1.3
1(d)	The formulas to be used for determining the section 7.11 contributions required for different categories of public amenities and services.	Section 2.2.1
1(e)	The section 7.11 contribution rates for different types of development, as specified in a schedule in the plan.	Section 1.1
1(f)	A map showing the specific public amenities and services proposed to be provided by the council.	Appendix A
1(g)	A works schedule that contains an estimate of their cost and staging (whether by reference to dates or thresholds).	Appendix A
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 3.3
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 2.2.2 and Section 2.4.3
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 2.4.1 and Section 2.4.4
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 2.3.1 and Section 2.3.4
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.	Section 2.5.1 to 2.5.4.
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 3.3

12 Recommended contribution rates

Our recommended total costs are set out in Table 12.1, recommended apportionment in Table 12.2 and recommended contribution rates for GP3 CP and Table 12.3.

Table 12.1 Recommended total costs for GP3 CP (millions, \$Jun23)

Category	Council proposed cost	IPART recommended cost	Change (\$)	Percentage change
Stormwater management	23.44	23.63	.19	0.81%
Transport	44.26	46.23	1.97	4.46%
Open space	48.99	50.95	1.96	4.00%
Plan administration	1.75	1.81	.06	3.53%
Land	106.27	107.41	1.14	1.07%
Total	224.70	230.03	5.33	2.37%

Note: totals may not add due to rounding.
Source: IPART calculations.

Table 12.2 Apportionment of cost per infrastructure category (\$Jun23)

	Total cost to be met by GP3 development	Apportionment factor to residential development	Cost apportioned to residential development	Apportionment factor to non-residential development	Cost apportioned to non-residential development
Open space					
Land	\$46,899,945	100%	\$46,899,945	0%	\$-
Works	\$50,946,062	100%	\$50,946,062	0%	\$-
subtotal	\$97,846,008	100%	\$97,846,008	0%	\$-
Stormwater					
Land	\$5,479,571	98.35%	\$5,389,268	1.65%	\$90,303
Works	\$23,627,214	98.35%	\$23,237,840	1.65%	\$389,374
subtotal	\$29,106,785	98.35%	\$28,627,108	1.65%	\$479,677
Transport					
Land	\$55,029,845	98.35%	\$54,122,959	1.65%	\$906,886
Works	\$46,230,780	98.35%	\$45,468,902	1.65%	\$761,878
subtotal	\$ 101,260,625	98.35%	\$99,591,861	1.65%	\$1,668,764
Plan administration					
	\$1,812,061	99.05%	\$1,794,792	0.95%	\$17,269
Total	\$230,025,479	99.06%	\$227,859,769	0.94%	\$2,165,710

Source: IPART calculations.

Table 12.3 Recommended contribution rates for GP3 CP (\$Jun23)

Category	Per person	Per lot or detached dwelling	Per medium density dwelling	Per shop top housing dwelling	Per studio dwelling ^a	Per ha non-residential
Stormwater	\$4,150	\$13,280	\$10,375	\$8,300	\$6,225	\$191,871
Transport	\$14,438	\$46,201	\$36,094	\$28,876	\$21,657	\$667,506
Open space	\$14,185	\$45,391	\$35,462	\$28,369	\$21,277	\$0
Plan admin.	\$260	\$833	\$650	\$520	\$390	\$6,908
Total	\$33,033	\$105,705	\$82,582	\$66,065	\$49,549	\$866,285

a. Including independent living unit/ secondary dwelling
Source: IPART calculations.

¹ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019, pp 14-16.

² Department of Planning and Environment, [Practice Note – Local Infrastructure Contributions](#), January 2019, pp 14-16.

³ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1 Administration, p 5.

⁴ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 2.

⁵ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, pp 3-5.

⁶ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 4.

⁷ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, pp 3-4.

⁸ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, pp 5-6.

⁹ Penrith City Council, [Application for assessment Glenmore Park Stage 3 Contribution Plan](#), September 2023, p 4.

¹⁰ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document.

¹¹ Penrith City Council, GP3 CP works schedule.

¹² Penrith City Council, GP3 CP works schedule.

¹³ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 10.

¹⁴ Penrith City Council, GP3 CP works schedule.

¹⁵ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, pp 6-9.

¹⁶ Penrith City Council, GP3 CP works schedule.

¹⁷ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, pp 15-16.

¹⁸ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.

¹⁹ Penrith City Council, Second RFI response for GP3 (Part 1 of 3), 9 April 2024

²⁰ Penrith City Council, GP3 CP works schedule.

²¹ Penrith City Council, GP3 CP works schedule.

²² Penrith City Council, GP3 CP works schedule.

²³ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 12.

²⁴ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.

²⁵ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 10.

²⁶ Penrith City Council, GP3 CP works schedule.

²⁷ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019.

²⁸ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.

²⁹ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 8.

³⁰ Penrith City Council, GP3 CP works schedule.

³¹ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019.

³² Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.

³³ Penrith City Council, GP3 CP works schedule.

³⁴ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, pp 15-16.

³⁵ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019.

³⁶ Penrith City Council, [Application for assessment of a local infrastructure contributions plan – Penrith City Council Glenmore Park Stage 3 Contribution Plan](#), September 2023, p 15.

³⁷ IPART, Glenmore Park Stage 3 Draft Report, May 2024, pp 10-11.

³⁸ IPART, Glenmore Park Stage 3 Draft Report, May 2024, pp 12-13.

³⁹ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), 2019, p 16.

⁴⁰ Penrith City Council, submission to Glenmore Park Stage 3 Draft Report, June 2024, p 6.

⁴¹ Penrith City Council, submission to Glenmore Park Stage 3 Draft Report, June 2024, pp 3-6.

- ⁴² Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.
- ⁴³ Penrith City Council, GP3 CP works schedule.
- ⁴⁴ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019.
- ⁴⁵ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022 – Part 1: Administration, p 7.
- ⁴⁶ Department of Planning, Housing and Infrastructure, [Practice Note – Local Infrastructure Contributions](#), January 2019.
- ⁴⁷ J. Wyndham Prince, Water Cycle Management Strategy Report – Glenmore Park Stage 3 (GP3), April 2023.
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- ⁴⁹ IPART, Request for Information for CP Glenmore Park Stage 3, 21 March 2024.
- ⁵⁰ Penrith City Council, Response to second Request for Information for GP3 (Part 2 of 3) 19 April 2024.
- ⁵¹ GLN, Public Domain and Open Space Strategy Glenmore Park Stage 3 At Mulgoa, January 2023, p 9.
- ⁵² GLN, Public Domain and Open Space Strategy Glenmore Park Stage 3 At Mulgoa, January 2023, p 9.
- ⁵³ IPART calculation.
- ⁵⁴ IPART, Final Report [Assessment of Menangle Park Contributions Plan Campbelltown City Council](#), December 2018, pp 43-44.
- ⁵⁵ Penrith City Council, [Penrith Sport and Recreation Strategy](#), March 2020, p 18.
- ⁵⁶ NSW Government, Architect's Draft Greener Places Open Space for Recreation Guide, 2020.
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- ⁵⁹ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 17.
- ⁶⁰ Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2023 – Part 2 Technical Document, p 17.
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- ⁶² IPART, [Final Report - Local Infrastructure Benchmark Costs](#), April 2014.
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- ⁶⁵ IPART, Glenmore Park Stage 3 Draft Report, May 2024, pp 17-18.
- ⁶⁶ Penrith City Council, submission to Glenmore Park Stage 3 Draft Report, June 2024, pp 6-7.
- ⁶⁷ Penrith City Council, GP3 CP works schedule.
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- ⁷⁵ Penrith City Council, [submission to Draft Report](#), June 2024, p 7.
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¹⁰¹ Penrith City Council, GP3 CP works schedule.

¹⁰² Penrith City Council, Glenmore Park Stage 3 Development Contributions Plan 2022– Part 1: Administration, p 12.

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