

Independent Pricing and Regulatory Tribunal (IPART)
PO Box K35
Haymarket Post Shop
SYDNEY NSW 1240

Email: bronwen.sandland@ipart.nsw.gov.au

Dear Ms Sandland,

Re: IPART Approach to Assessing Contributions Plans Discussion Paper – Liverpool City Council Submission

Thank you for the opportunity for Liverpool City Council (“Council”) to provide feedback on the Discussion Paper into the IPART approach to assessing Contributions Plans, as well as the updated benchmark costs for local infrastructure. Council appreciates the focus on improving the efficiency and accuracy of IPART-reviewed Contributions Plans and welcomes this consultation process to address critical challenges faced by Local Government.

After reviewing both the Draft Discussion Paper, and updated benchmark costs, Council provides the following recommendations for IPART consideration.

1. Review to Contribution Cap Amounts

In 2012, the *Environmental Planning and Assessment (Local Infrastructure Contributions) Direction 2012* established a maximum cap for Section 7.11 Contributions of \$20,000 per dwelling or lot, with an increased cap of \$30,000 for Greenfield areas. Despite the considerable increase in construction costs, land values and inflation since 2012, both caps have remained unchanged.

This scenario has made, and continues to make, it particularly difficult for Local Government to deliver the essential infrastructure and services to be funded from capped Section 7.11 Contributions Plans as the quantum of infrastructure envisaged at Plan approval can no longer be delivered as the cap has remained static while all other costs have increased.

Consideration should be given to routinely updating the capped values in-line with CPI. Alternatively, consideration of a framework that replaces the fixed caps with frequently updated aggregated benchmark costs could be also adopted.

Aligning contribution caps with current infrastructure delivery costs would help Local Government close potential funding gaps and ensure Contributions Plan-identified essential infrastructure and services is delivered concurrently with housing growth.

2. Increase Frequency of Benchmark Costs Review

Consideration should be given to the introduction of a clear and consistent policy that necessitates the regular review and subsequent adjustment to benchmark costs for local infrastructure. Establishing an annual review process at the end of each financial year would help maintain alignment with current and future market conditions.

This review process could incorporate:

- Verified construction costs from Council;
- Actual tender prices from completed projects;
- QS cost estimates on detail designs works; and
- Broader economic indicators, including CPI and inflation forecasts.

Regular updates to benchmark costs for local infrastructure would help minimise funding gaps, prevent discrepancies, and enable Local Government to deliver essential infrastructure and services when they are most need by our growing communities. This approach would also support the NSW Government in meeting their commitments under the National Housing Accord by ensuring infrastructure delivery keeps pace with development needs.

3. Risk Management Framework for Contribution Assessment

Consideration should be given to the introduction of a risk management framework within the Contributions Plans assessment process to address financial risks associated with infrastructure delivery. A clear risk mitigation process would be helpful to evaluate potential impacts of Contribution Plans on infrastructure projects and housing supply.

Such a framework could identify and address risks, including funding shortfalls and delays caused by outdated benchmarks. By implementing this approach at a policy level, Local Government would be much better placed to deliver infrastructure more sustainably and support the growing needs of their communities while minimising financial risks.

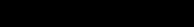
4. Targeted Contribution Plan (CP) Reviews

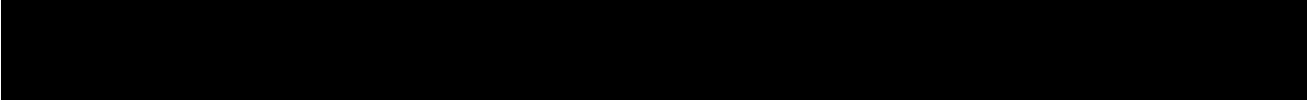
Consideration should be given to the introduction a mechanism for targeted Contributions Plan reviews to address cost discrepancies for specific infrastructure items listed within an approved Contributions Plan. This mechanism would allow Local Government to update the costs of particular infrastructure items identified as significantly higher based on detailed designs or tender prices compared to the amounts listed in the Contributions Plan.

Targeted reviews could be conducted between regular Contributions Plan review cycles and would focus on individual infrastructure items instead of the entire Plan. This approach would enable Local Government to adjust costs promptly without requiring a full IPART review. It would also help reduce administrative delays and ensure the timely delivery of critical infrastructure.

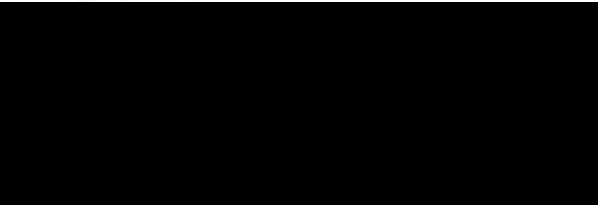
Clear guidelines on the process and thresholds for initiating targeted reviews, such as a variance exceeding the originally considered contingency, could further enhance the efficiency and responsiveness of the Contributions Planning Framework.

Liverpool City Council generally supports IPART's efforts to streamline the Contributions Plan assessment process and ensure benchmark costs correctly reflect the real cost of infrastructure. The recommendations outlined above aim to address critical challenges and enhance the effectiveness of our Contribution Plans which is beneficial for all levels of Government, the development sector and our growing communities.

Once again, Council welcomes the opportunity to provide feedback on the Draft Discussion Paper and updated benchmark costs. Should IPART require any further clarification on the recommendations put forward by Council, please don't hesitate to contact 



Yours sincerely



If you do not understand this letter/application, please ring the Telephone Interpreter Service (131 450) and ask them to contact Council (1300 362 170). Office hours are 8.30 am to 5.00 pm, Monday to Friday.

ARABIC

إذا لم تستطع فهم هذا الطلب ، الرجاء الاتصال بخدمة الترجمة الهاتفية على رقم 131 450 واسألهم أن يتصلوا بالبلدية على رقم 1300 362 170 . دوام ساعات العمل هي من الساعة 8.30 صباحًا إلى 5.00 بعد الظهر من الاثنين إلى الجمعة.

CHINESE

如您看不懂此信 / 申請書，請打電話給「電話翻譯服務台」(131 450)，請他們聯絡市政廳(市政廳電話 1300 362 170)。市政廳辦公時間，星期一至星期五，上午八時三十分至下午五時。

CROATIAN

Ako ne razumijete ovo pismo/aplikaciju, molimo nazovite Službu prevodilaca i tumača (Translating and Interpreting Service - na broj 131 450) i zamolite ih da nazovu Općinu (na 1300 362 170). Radno vrijeme je od 8.30 ujutro do 5.00 popodne, od ponedjeljka do petka.

GERMAN

Wenn Sie diesen Brief/Antrag nicht verstehen können, rufen Sie bitte den Telefon Dolmetscher Dienst (Telephone Interpreter Service) (131 450) an und lassen Sie sich vom Personal mit dem Gemeinderat (Council) in Verbindung setzen (1300 362 170). Geschäftsstunden sind von 8:30 bis 17:00 Uhr, montags bis freitags.

GREEK

Αν δεν καταλαβαίνετε αυτή την επιστολή/αίτηση, σας παρακαλούμε να τηλεφωνήσετε στην Τηλεφωνική Υπηρεσία Διερχομένων (131 450) και να τους ζητήσετε να επικοινωνήσουν με το Δημοτικό Συμβούλιο (1300 362 170). Τα γραφεία του είναι ανοιχτά από τις 8.30π.μ. μέχρι τις 5.00μ.μ. από Δευτέρα μέχρι και Παρασκευή.

HINDI

अगर आप इस पत्र/आवेदन को पढ़कर समझ नहीं पा रहे हैं तो कृपया टेलीफोन सहायक सेवा (131 450) को फोन करें और उनसे काउंसिल (1300 362 170) से संपर्क करने को कहें। कार्यालय का समय सोमवार से बुधवार तक प्रातः ८:३० बजे से सायं ५:०० तक है।

ITALIAN

Se non comprendi questa lettera/questo modulo di domanda, telefona al Servizio traduzioni e interpreti al numero 131 450 chiedendo di essere messo in contatto con il Comune (telefono 1300 362 170). Orario d'ufficio: ore 8.30 -17.00, dal lunedì al venerdì.

KHMER

បើលោកអ្នកមិនយល់ពីអត្ថន័យប្រតិបត្តិទេស ឬមន្ត្រីស្តីពីសេវាបកប្រែភាសាភាសាខ្មែរ (លេខ 131 450) ហើយស្នើសុំឱ្យគេទាក់ទងសាលាក្រុង (លេខ 1300 362 170)។ ពេលម៉ោងធ្វើការគឺម៉ោង 8 កន្លះព្រឹកដល់ម៉ោង 5 ល្ងាច ពីថ្ងៃច័ន្ទដល់ថ្ងៃសុក្រ

MACEDONIAN

Ako ne go razbirate ova pismo/aplikacija, ve molime da se javite vo Telefonската преведувачка служба на 131 450 и замолете ги да стапат во контакт со Општината на 1300 362 170. Работното време е од 8.30 часот наутро до 5.00 часот попладне од понеделник до петок.

MALTESE

Jekk ma tifhimx din l-ittra/applikazzjoni, jekk joghgbok ċempel lis-Servizz ta' l-Interpretu bit-Telefon (131 450) u itlobhom jikkuntattjaw il-Kunsill (1300 362 170). Il-hinijiet ta' l-Uffiċċju huma mit-8.30a.m. sal-5.00p.m., mit-Tnejn sal-Gimgha.

POLISH

Jeśli nie rozumiesz treści niniejszego pisma/podania, zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service) pod numer 131 450 I poproś o telefoniczne skontaktowanie się z Radą Miejską pod numerem 1300 362 170. Godziny urzędowania: 08.30-17.00 od poniedziałku do piątku.

SERBIAN

Ako ne razumete ovo pismo/aplikaciju, molimo vas da nazovete Telefonску преводилачку службу (131 450) и замолите их да контактирају Општину (1300 362 170). Радно време је од 8.30 ујутро до 5.00 поподне, од понедељка до петка.

SPANISH

Si Ud. no entiende esta carta/solicitud, por favor llame al Servicio Telefónico de Intérpretes (131 450) y pídale que llamen a la Municipalidad (Council) al 1300 362 170. Las horas de oficina son de 8:30 am a 5:00 pm, de lunes a viernes.

TURKISH

Bu mektubu veya müracaatı anlayamazsanız, lütfen Telefon Tercüme Servisi'ne (131 450) telefon ederek Belediye ile (1300 362 170) ilişkiye geçmelerini isteyiniz. Çalışma saatleri Pazartesi - Cuma günleri arasında sabah saat 8:30 ile akşam 5:00 arasındır.

VIETNAMESE

Nếu không hiểu thư/đơn này, xin Quý Vị gọi cho Telephone Interpreter Service (Dịch Vụ Thông Dịch Qua Điện Thoại), số 131 450, và nhờ họ liên lạc với Council (Hội Đồng), số 1300 362 170. Giờ làm việc là 8 giờ 30 sáng đến 5 giờ 00 chiều, Thứ Hai đến Thứ Sáu.