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Your submission for this review:

Northern Beaches Council is pleased to forward its submission to IPART on the Discussion paper - review of our approach to assessing contributions plans and Draft report on benchmark costs for local infrastructure (November 2024). If you have any enquiries in relation to Council's submission please contact Liza Cordoba on [REDACTED]

1 What do you think could be improved about how IPART assesses contributions plans?

Council's experience with IPART thus far has been positive, due mainly with the regular communication received during IPART's review of the Frenchs Forest Town Centre Contributions Plan, which was seamless regardless of changes in personnel.

Council welcomes IPART's initiative to refine their approach in assessing contributions plans. The suggestion for Council to submit a post-exhibition revision of a draft Contributions Plan to IPART for review is ideal and reasonable so long as development applications on the land identified by the CP are not yet nearing determination stage and these proposals will result in increased development requiring infrastructure from the draft CP. Often times, Council needs to adopt the Contributions Plan to enable the imposition of conditions requiring payment of development contributions on developments ahead of the IPART review being completed.

2 Do you support using a land value index to update land costs in your CP? Is there any other guidance about our assessment of land acquisition costs that would support your preparation of CPs?

Council agrees with the use of a land value index over CPI to index acquisition cost for land. Council adopted this approach for the Frenchs Forest Town Centre contributions plan (reviewed by IPART, Final Report July 2023).

It is encouraging that IPART will update its 2020 *Information Paper - Contributions plan assessment: land costs* bringing it into line with its recent decisions and recommendations to councils. Councils would benefit from seeing a number of different approaches considered by and agreed to IPART.

3 Do you support IPART using Urban Development Program growth forecasts as the agreed measure for population forecasts when assessing contribution plans?

Council does not support the UDP growth forecasts. The UDP growth forecasts available on the dashboards <https://www.planningportal.nsw.gov.au/online-dashboards> are generally shown to be at LGA level rather than specific precincts or growth areas unless that is yet to be made available on the website. The UDP growth forecasts generally inform high level identification of infrastructure needs of the region and consequently may be appropriate in the preparation of Section 7.12 Contributions Plans covering an LGA.

Council's first principle approach to population forecast relies on current and forecast residential occupancy data for an area of a similar density and typologies

likely in an area planned for uplift. The UDP dashboard would be most useful where the housing delivery monitor is expanded at the micro scale (eg precinct or growth area) with forecast household occupancy rate based on dwelling typology as well as current LGA basis.

4 Do you have any feedback on our proposal to develop guidance to councils on our assessment of reasonable timeframes in CPs?

No response provided

5 Do you have any feedback on our proposal to develop guidance on how we identify and assess the Practice Note criterion ‘other relevant matters’?

Council is supportive of IPART identifying what is involved in the ‘other relevant matters’ criterion upon which a CP will be assessed against. This makes for more open and greater transparency to the IPART review process.

Council appreciates the sentiments echoed in the paragraph, *“We consider that efficiently planned infrastructure should be designed with long lifetime...infrastructure specifications may be larger than currently needed to mitigate and adapt to changing conditions...”* However there remains gaps in the essential infrastructure list and councils are not able to levy for the construction of community facility buildings or libraries, which are essential public local infrastructure. Additionally, the embellishment of open space and community facilities in the essential works list should be amended to allow for greater embellishment above base embellishment. Currently, the approach for land and base embellishment works for land release areas but is grossly ineffective to support infill growth, which requires upgrade of existing facilities to increase capacity and diversify uses.

Council also reiterates its previous concerns to NSW Government¹ that the current threshold of \$20,000 and \$30,000 per new dwelling/lot is too low and has not kept up with inflation given the escalation of costs to deliver infrastructure. Council requests that IPART consider the impact the threshold has had on infrastructure delivery given the rising costs of materials and construction experienced in recent years.

In this regard, Council requests that IPART recommend to NSW Government and the Minister for Planning that the threshold be increased to \$45,000 per new dwelling/lot and for this to be the updated threshold to determine plans being reviewed by IPART.

6 Are there any other areas of IPART’s assessment of contributions plans that you would like guidance on?

Council is concerned with the contingencies proposed as they appear quite low. Council has adopted a Project Management Methodology that provides guidance to its project managers on allocating contingency budgets and capitalising employee costs to projects, which varies depending on the type of infrastructure

¹ Northern Beaches Council Submission to Exhibited Draft Local Infrastructure Contribution Practice Notes (February 2024)

project, the complexity and phase of the project and a risk assessment to determine the contingency %, that, in turn, may differ to what is in CP Cost Estimate Sheet.

Additionally, the contingency for stormwater works do not appear to account for latent conditions such as poor subgrade, conflicts with utilities, or the subsequent costs related to utility relocation or redesign of diversions.

I offer the following example of a pedestrian crossing that Council recently completed which resulted in an actual cost of \$143,900.60 (FY2023/24). Using the proposed methodology (IPART) and the Benchmark base rate of \$23,140 per unit, then if the same pedestrian crossing was to be constructed today then there is a significant overrun that can result in more delays in project timeframe.

Item T1.29 – pedestrian crossing			
Unit rate	\$23,140.00		
quantity	1		
Construction Base		\$23,140	
Adjustment Factors	Description	Factors	Notes
Regional		0	
Raw materials		0	
Brownfield constraints	Medium	25%	
Greenfield constraints			
Waste Disposal	Green Solid Waste	0	
Construction Cost (Adjusted)		\$28,925	
On costs	25%		
Contingency	40% (Transport)		<i>Council project: restricted hours, nightworks and regional road</i>
		\$50,618.75	

Council welcomes any guidance on capitalised employee costs as part of council's on-costs.

7 Do you support our proposal for IPART to convene regular forums about our CP assessment process? Should these be separate forums for councils and developers?

Council welcomes the proposition for IPART to convene regular forums centred on its CP assessment process, facilitating broader understanding and transparency in this process. Nonetheless, such future forums will need to be structured in a way that are not seen as an alternate forum to question or challenge a Contribution Plan, the nexus or apportionment applied in an already adopted or IPART-reviewed Contribution Plan.

8 Would you support IPART holding a stakeholder workshop on the CP when we receive the council's plan for assessment?

There is general support for IPART to hold a stakeholder workshop so long as there is clear understanding of IPART's role and assessment limited to the Practice Note criterion.

9 Would you support IPART inviting submissions on the CP as soon as we receive the council's plan for assessment in addition to submissions on our draft reports?

Council agrees with IPART's rationale for inviting submissions as it allows provide time for as much feedback as possible from the community and for IPART time to review and assess matters.

Conversely, a concern with inviting comments as soon as it receives council's CP for assessment maybe the potential consultation fatigue and general misunderstanding of the two rounds of consultation albeit being conducted by two distinct entities.

10 Do you support a performance-based approach to assess nexus for open space, consistent with the Draft Greener Places Design Guide?

Council supports a performance -based approach to assessing nexus for open space, consistent with Council's adopted Open Space and Sportsfield Strategies.

11 Do you have any feedback about the list of local infrastructure benchmarks? Are there any other infrastructure items that you should think should be included?

The approach taken in developing the benchmark cost sheets is logical and follows a similar approach to NSW Reference Rates Manual for Valuation of Water Supply, Sewerage and Stormwater Assets. These are indicative and individual projects will vary in cost depending on other factors including contractor availability, significant infrastructure input cost increases, utilities and other services complexity, and other site constraints. It would be helpful to understand the number and location of sample infrastructure projects used in developing these rates.

12 Do you have any feedback about the updated draft individual infrastructure benchmarks?

Open Space – sporting facilities.

All concrete should be minimum Low Carbon Concrete 40%.

Item Reference: OSE-1.06 Cricket wicket practice nets 3 nets.

Applicable standards should also reference the:

Cricket Australia publish a Community Cricket facility guideline 2023.

https://resources.playcommunity.pulselive.com/playcommunity/document/2024/01/05/a3d540dc-8841-42ea-a348-1e81adcd54f9/Community-Cricket-Facility-Guidelines-2023_Online-Version.pdf

Item Reference: OSE-1.07 Cricket wicket.

Inclusion: Turfing (Natural turf 1m wide perimeter of wicket) is also required to complete the finished levels and enable fit for use. \$2,000

Exclusion: Winter season cover to enable winter season sport eg soccer. \$15,000

Item Reference: OSE-1.09 Double playing fields

Irrigation systems should be reasonably required. \$200,000

Lighting: Current Australian Standard AS 2560.2:2021 match practice and club competition level lighting. Eg 100lux for Soccer, 150 lux for AFL

Item Reference: OSE-1.10 Combined field

Irrigation systems should be reasonably required. \$100,000

Specific Sub item information to include AFL / Cricket 23,000m², AFL field length 165m x cricket field width 130m

Lighting: Current Australian Standard AS 2560.2:2021 match practice and club competition level lighting. Eg 100lux for Soccer, 150 lux for AFL

Item Reference: OSE-1.14 Tennis court (outdoor)

Remove the word "Plexipave" as this is a proprietary product with restricted availability to one construction company. "Acrylic surface finish" is sufficient information.

30mm fine gap graded asphalt is **not constructable** and is vulnerable to damage by heating and cooling, expansion and contraction causing cracking and deformation.

Minimum constructable AC surface is 50mm. AC7

Lighting: Current Australian Standard AS 2560.2:2021, recreational use.

Item Reference: OSE-1.15 Netball court (outdoor)

30mm fine gap graded asphalt is **not constructable** and is vulnerable to damage by heating and cooling, expansion and contraction causing cracking and deformation.

Minimum constructable AC surface is 50mm. AC7 PrimerBase 100mm DGB20 98% compaction

Subbase 100mm DGS20 95% compaction

Subgrade compacted CBR 5% compacted to 90%

Perimeter drainage

Estimated cost \$350,000
Exclusion that may be reasonable, Concrete flush edge beam 100mm x 300mm.

Item Reference: OSE-1.16 Netball court (6 court outdoor)

Per above OSE1.15
Estimated cost \$1,500,000
Exclusion that may be reasonable, Concrete flush edge beam 100mm x 300mm.

Item Reference: OSE-1.17 basketball court (outdoor)

Per above OSE1.15

Item Reference: OSE-1.18 Playing lighting

All lighting to be LED technology.
Minimum lighting levels for community sport training / match practice per AS 2560 (2021) for all sports.
Pole heights are minimum heights to achieve compliance with AS2560 (2021) club competition. Eg 18m for 4 poles with 2 LEDs per pole soccer to 100lux (sideline pole position)
Estimated cost: \$220,000
Exclusions may be reasonably required: screw pile footings and caps.

Item Reference: OSE-1.18 Double / combined playing lighting

All lighting to be LED technology.
Minimum lighting levels for community sport training / match practice per AS 2560 (2021) for all sports.
Pole heights are minimum heights to achieve compliance with AS2560 (2021) club competition. Eg 25m for 6 poles with 4 LEDs per pole soccer to 100lux (corner pole position) as there is no room to have a pole in the middle of a double field.
Estimated cost: \$500,000
Exclusions may be reasonably required: screw pile footings and caps.

Item Reference: OSE-1.21 Park security lighting

Estimated cost \$5,000
Exclusions may be reasonable: pedestrian standard lighting per Australian Standards.

Item Reference: OSE-1.24 playground

- OSE-1.24.7 - Soft fall (40mm thick rubber Softfall, 25mm cushion layer, 15mm colour layer) estimated cost \$570 m²
- OSE-1.24.8 - Fencing Steel posts and mesh: height 950mm (1,200mm high) 3.18.10 Extra over mesh access gate; single estimated \$250/m

Item Reference: OSE-1.25 shade sail

Exclusion: wind rating

Item Reference: OSE-1.31 Synthetic playing surface

Inclusion: Vertically draining base to comply with FIFA / AFL / Rugby standards.
Concrete base not required for FIFA / AFL / Rugby compliance.
Estimated cost \$350m²

Active transport specific infrastructure

The reference documents do not include the latest guidance from Transport for NSW on walking and cycling infrastructure in relation to path widths, shared user paths and cycleways. Contingency levels are limited in relation to infrastructure development, with this potentially reflecting the amount of pre submission investigation undertaken, however when developing and documenting a brownfield development contribution plan in this part of the process is generally not at a level where confidence in the amount contingency could be reduced to the proposed level.

The streetlighting cost seems to be based to the installation of lights on an existing network not the design and delivery of an underground streetlighting solution. Note that this does not include PX or V cat lighting solutions.

Stormwater Infrastructure

It was focused on the increasing costs associated with addressing higher consultancy fees, latent conditions (such as acid sulphate soil, contaminated soil, approvals from utility authorities like Sydney Water to work near underground assets, and dewatering), and environmental approvals on stormwater projects, which, in my view, had not been addressed in the draft report. The NSW Climate Change Adaptation Action Plan 2025-2029 was released late last year. <https://www.climatechange.environment.nsw.gov.au/about-adaptnsw/nsw-government-action-climate-change/Adaptation-Action-Plan-2025-2029>
The latest update to the Australian Rainfall and Runoff (ARR) strongly recommends using future climate projections to guide design decisions, ensuring that drainage systems are more resilient to future climate extremes.

13 Do you have any feedback on our proposal to adopt the updated draft individual infrastructure benchmarks for individual infrastructure benchmarks?

Benchmarks are useful as a guide however each project will vary based a number of factors including but not limited to: the individual design, site constraints such as topography, resource availability, level of 'brownfield / infill' impact, potential for packaging other works, level of service expectations/requirements, contractor availability, significant local latent conditions such as contamination or geotechnical issues and the cost impact of waste disposal.

14 Would our updated individual infrastructure benchmarks be useful to you in preparing your contributions plan, particularly at an early stage?

The individual infrastructure benchmarks assist as a guide to cost estimation however if during the preparation and finalisation of a contributions plan (ahead of public exhibition) Council has updated costings based on actual example that is more contemporary, then this would be relied upon in the infrastructure costings for inclusion into the draft contribution plans.

The costing estimates provided differ greatly from Council’s existing Civil Works panel rates – this is likely to be due to the limited number of contractors that are prepared to travel to this location to undertake the works when they have to travel across Sydney and the limited supply infrastructure in this area. Previously Council has used the panel rates and provided an estimated CPI multiplier based on predicted delivery timeframes.

For another Council project, the actual unit cost is above the proposed benchmark unit rate, and with additional cost for asbestos remediation, the project cost to Council is again significantly higher than IPART’s proposed benchmarking and methodology.

Item T1.29 – pedestrian crossing			
Unit rate	\$23,140.00		<i>Council project: Actual Unit cost \$98,000.00</i>
quantity	1		
Construction Base		\$23,140	
Adjustment Factors	Description	Factors	Notes
Regional		0	
Raw materials		0	
Brownfield constraints	Medium	25%	
Greenfield constraints			
Waste Disposal	Green Solid Waste	0	
			<i>Asbestos Remediation \$22,000</i>
Construction Cost (Adjusted)		\$28,925	\$120,000.00
On costs	25%		
Contingency	40% (Transport)		<i>Council project: 15%</i>
			<i>Council project: nightworks and regional road \$17,000</i>
		\$50,618.75	\$155,000.00

15 Do you have any feedback about the draft aggregate benchmarks?

It is difficult to comment on the appropriateness of these rates as there is little explanation of how they have been determined. Section 7.2.1 'Range of aggregate Construction Costs' recognises that the sample size of data in some of these subcategories was limited and it was determined that this would not provide a robust outcome.

Basing the aggregate benchmark on either option - net developable area or population - still needs further investigation to ascertain likely implications and if councils will be disadvantaged or otherwise.

16 Do you have any feedback on using the draft aggregate benchmarks to assess reasonable costs in a CP?

It is difficult to comment on the application of these rates as there is little explanation of how they have been calculated. Section 7.2.1 'Range of aggregate Construction Costs' recognises that the sample size of data in some of these subcategories was limited and it was determined that this would not provide a robust outcome. For comparison purposes, these have been developed on a 'greenfield' site basis, with the Genus methodology to add relevant percentages for relevant non-construction costs (survey, investigation, design, project management etc).

Additionally, Genus Advisory notes several limitations to the methodology, including 'Construction Costs are based on the Contribution Plans, and the actual costs of completed projects have not been included', making it difficult to make comparison with our current construction costs experience.

17 Do you have any feedback on the methodology used to develop the draft aggregate benchmarks?

The Draft Aggregate Benchmarks have been based of the aggregate Construction Costs from Contribution Plans from 2018 to 2024. It would be helpful to understand the sample size, locations and type of projects from which these have been developed. This would assist in our ability to provide feedback on the methodology.

18 Would you be willing to provide work scheduled or other relevant information to us to support the development of our aggregate benchmarks?

Council is happy to assist in any way.