



Australia's property industry

## Creating for Generations

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29 June 2020

Kerry Robinson  
Chief Executive Officer  
Blacktown City Council  
PO Box 63  
BLACKTOWN NSW 2148

Email - [council@blacktown.nsw.gov.au](mailto:council@blacktown.nsw.gov.au)

Dear Mr Robinson

### Contribution Plan CP20 – Riverstone & Alex Ave Precincts (File 145-187-28)

The Property Council welcomes the opportunity to provide Blacktown City Council with comments on its Contribution Plan CP20 – Riverstone and Alex Avenue Precincts (CP20).

As Australia's peak representative of the property and construction industry, the Property Council's members include investors, owners, managers and developers of property across all asset classes. We are pleased to provide the following comments to Council regarding the proposed contributions plan.

We note that this contribution plan was reviewed by the Independent Pricing and Regulatory Tribunal (IPART) during 2016 and its recommendations were released in July 2016. The Minister for Planning issued his advice to Council in January 2019 and that advice required Council to make five (5) amendments to the plan prior to LIGS funding becoming available. We support those changes being made to reduce the total cost of works under the plan. A further five (5) amendments must be considered by Council in the next review of CP20.

We are aware that currently under CP20 the maximum contribution amount Council can currently impose is \$45,000 per dwelling. We were concerned, without any intervention by the NSW Government, from 1 July 2020 Council would have levied about \$80,484 per dwelling. For this reason, we have welcomed the Government's announcement of the Accelerated Infrastructure Fund (AIF) and the Minister's decision to issue the *Environmental Planning and Assessment (Local Infrastructure Contributions) Amendment Direction 2020*. Under this recent direction, local contributions will be capped at \$50,000 at least until 30 December 2020.

During the COVID-19 pandemic we have heard from several members undertaking development within Blacktown City Council's urban release precincts. The issues raised by members concern the barriers preventing widespread take up of two of the contribution plan's available payment methods. Members have identified dedication of land and works in kind as attractive alternative

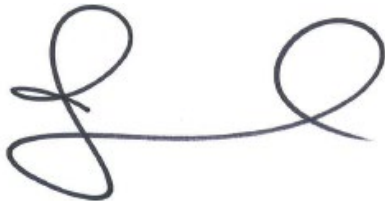
payment options but they would have concerns with several of the requirements attached to these mechanisms. We would welcome the opportunity to discuss this issue with you further.

Another issue relevant to this plan is how Council schedules works under the plan, particularly the construction of stormwater detention basins. This issue becomes critical where developers provide temporary basins and are expected to maintain those facilities for long periods after completion of their developments and timeframes for completion of permanent detention basis are altered to occur later than first scheduled.

I would be grateful if you could nominate an appropriate council officer who could discuss these issues with our residential developer members.

Should you have any questions regarding the content of this submission, do not hesitate to contact Troy Loveday, Senior Policy Advisor, on 0414 265 152 or [tloveday@propertycouncil.com.au](mailto:tloveday@propertycouncil.com.au)

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Jane Fitzgerald', with a stylized, flowing script.

**Jane Fitzgerald**  
**NSW Executive Director**  
**Property Council of Australia**