

13th April 2021

Emille Van Heyningen
Manager Strategic Land Use Planning & Environment
City of Wanneroo

Via email: Emille.VanHeyningen@wanneroo.wa.gov.au

Dear Mr Van Heyningen,

East Wanneroo Cells 1-9 Developer Contribution Arrangements - Annual Review of Costs (2020-2021)

Thank you for the opportunity to provide feedback in relation to the above *Review of Costs*. The Urban Development Institute of Australia WA (UDIA WA) is the peak body representing the property development industry in Western Australia. UDIA is a membership organisation with members drawn from the residential, commercial and industrial property development sectors. UDIA members include both private and public sector organisations. Our industry represents approximately 9.3% of Western Australia's Gross State Product, contributing \$28.2 billion annually to the Western Australian economy and \$267.6 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 205,100 Western Australians and 2.035 million Australians across the country.

Comment

UDIA commends Wanneroo for seeking to ensure transparency in reporting relating to Development Contributions Schemes and inviting comment regarding the Annual Review of Costs (2020-2021) for East Wanneroo Cells 1-9.

Broadening of the Scope of Cell Works

UDIA is concerned and does not support the Review's broadening of the scope of Cell Works that should be charged to the DCP's including the 'rebuilding, replacement or upgrading of relevant roads'. The City has not provided any evidence to verify that DCP funding can be used for the rebuilding, replacement or upgrading of the relevant roads, even if the original works were initially funded by the DCP.

This is contrary to the current SPP3.6 Development Contributions for Infrastructure which states that *"contributions are for the initial capital requirements only and not for ongoing maintenance and/or operating costs of the infrastructure."* Similarly, the draft SPP3.6 Infrastructure Contributions also states that *"contributions are for the initial capital requirements only and not for ongoing maintenance or operating costs of the infrastructure, beyond that required of developers through the subdivision and development process."*



Lack of transparency and justification for reimbursement

UDIA is also concerned by the lack of transparency regarding the \$3.8 million the City is seeking to reimburse itself, without providing details of the specific cell works, projects, costs, and when these costs were incurred. As such, UDIA does not support this reimbursement without a public and fully transparent, independent verification of the appropriacy of the transfer of these funds.

Should you require any assistance or further information regarding this submission UDIA WA would be delighted to assist, and invite you to please contact Christopher Green, Director Policy and Research, at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tanya Steinbeck', written over a light grey rectangular background.

Tanya Steinbeck
Chief Executive Officer