

17 January 2011

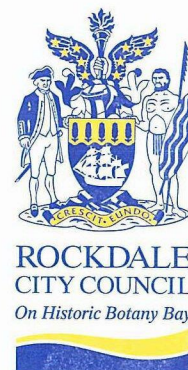


PCU018693

Our Ref: F10/9
Contact: Margaret Fasan - 95621683

Major Projects Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Department of Planning
Received
19 JAN 2011
Scanning Room



Dear Mr Woodland

Re: Preferred Project Report and amended drawings, Concept Plan Discovery Point, 1 Princes Highway, Wolli Creek (MP10 0003)

Thank you for the opportunity to comment on the Preferred Project Report (PPR) and amended drawings of the Concept Plan for Discovery Point.

Whilst it is acknowledged that a number of issues raised in Council's submission on the Concept Plan have been addressed, there are still outstanding matters. Additionally, the inclusion of the Discovery Point Concept Plan Development Design Guidelines and the Discovery Point Public Domain Plan as part of the PPR is not supported by Council.

1.0 Outstanding issues identified in council's submission on the concept plan

1.1 Public domain

Discovery Point Place

Council's submission identified that the ratio between the width and height of buildings in Discovery Point Place and Chisholm Street would not provide an appropriate "human scale". Whilst the use of townhouse building typologies in Chisholm Street will help to reduce the scale of buildings, this is not the case in Discovery Point Place where a 13m wide street will be flanked by buildings of up to 14 storeys in height. Discovery Point Place is an important street as it will provide train users with their first experience of Wolli Creek.

Recommendation

It is recommended that the width of Discovery Point Place be increased to achieve a more satisfactory relationship with the height of the buildings.

Draft Wolli Creek and Bonar Street Public Domain Plan

Rockdale Council has developed a strategy for Wolli Creek to ensure its redevelopment will deliver social, economic and environmental benefits to the City. The strategy revolves around the interrelationship between proposed uses, built form, connectivity and public domain. The strategy also acknowledges the challenge involved in transforming a degraded industrial area into a high quality urban environment.

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The strategy will be implemented through objectives and controls in the draft Rockdale LEP and DCP and the *Wolli Creek and Bonar Street Precinct Public Domain Plan*. The Public Domain Plan (PDP) provides a vision for the public spaces within the precinct and is one of the primary means of establishing a desired future character for the area. The Plan will ensure there is a consistent and high quality approach to the public domain throughout Wolli Creek.

Council's submission recommended that the construction of the public domain should be undertaken in accordance with the *Draft Wolli Creek and Bonar Street Public Domain Plan and Technical Manual*. In response to this recommendation, Australand has prepared the Discovery Point Landscape Design Guidelines to accompany the PPR with a reference to the Plan in the Statement of Commitments. The Guidelines are also cited in the amended Conditions of Consent, rather than Council's PDP.

Council does not endorse the preparation of the Discovery Point Landscape Design Guidelines because:

- The Guidelines do not provide certainty of outcome. This is due to insufficient detail relating to materials and finishes, street design and layout, street tree planting, street furniture and lighting. From the level of information provided in the Guidelines it is not possible to determine the design quality or requirements for each street. It is noted that Council's *Draft Wolli Creek and Bonar Street Public Domain Plan and Technical Manual* provides highly detailed specifications for all aspects of the streetscape for each street.
- The Guidelines do not provide a consistent approach to the public domain in Wolli Creek. Several key streetscape elements such as the street lighting and litter bins are different to both the existing elements and Council's PDP. There is no rationale provided in the Guidelines regarding the selection of these streetscape elements.
- The Guidelines do not promote Water Sensitive Urban Design initiatives which is a key objective of Council's PDP.

Council believes that the *Wolli Creek and Bonar Street Public Domain Plan* will achieve a superior and certain design outcome for the public domain in the Discovery Point precinct that will ensure a distinctive character for the area. Prior to the adoption of the PDP, Council is prepared to work with Australand to update the Plan so that it is consistent with the Concept Plan and any outstanding issues are resolved.

Recommendation

It is recommended that the construction of the public domain should be undertaken in accordance with the *Wolli Creek and Bonar Street Public Domain Plan and Technical Manual* and that the Statement of Commitments reference the Public Domain Plan and not the Discovery Point Landscape Design Guidelines.

1.2 Above ground parking

It is noted that the quantum of above ground parking has been significantly reduced to a maximum of 8,000sqm across the Concept Plan site. The reduction is satisfactory provided that the facades of the above ground parking structures are treated appropriately as per the examples provided in the PPR.

1.3 Apartment mix

It is noted that the number of studio and one bedroom apartments has been reduced and the number of 2 bedroom apartments increased. However, Council's preference is for the

apartment mix to be provided within the range recommended under Council's draft Development Control Plan 2011.

Recommendation

Apartment mix should comply with the range contained in draft Rockdale DCP 2011.

1.4 Dwelling sizes

Council's submission recommended that the apartment sizes should be in accordance with the suggested size relevant to the apartment layout table under Part 3 of the Residential Flat Design Code (RFDC) in SEPP 65. The proponent has amended the apartment size to include a larger size for the two bedroom with two bathroom apartments.

The amended submission also recognises that the proposed apartment sizes do not preclude larger apartment sizes being provided as they are only minimums. However no assurance is given that this will be the case.

Council's Residential Amenity Improvement Strategy (RAIS) and Draft DCP 2011 recommend larger apartment sizes than those in the RFDC in most instances, except for the three bedroom apartments (124sq.m. in the RFDC as opposed to 115sq.m. in RAIS).

Based on the comparative dwelling size analysis provided by the proponent in the amended submission, it is recommended that the minimum size for three bedroom apartments be set at 115 sqm., which is consistent with Council's controls. Further there should be better certainty that the precinct will also provide a percentage of larger apartment sizes to achieve the objectives and requirements of the RFDC.

Recommendation

It is recommended that the minimum size for three bedroom apartments be set at 115 sqm.

1.5 Reduction in commercial floorspace.

The PPR has not addressed Council's concerns regarding the reduction in commercial floorspace. Additionally, the intent of the Discovery Point Concept Plan Development Design Guidelines suggests that, in future development applications, the quantum of retail/commercial floorspace may be even further reduced.

1.6 Transport Interchange

Council still has concerns in relation to the design of the road system providing access to and from the bus interchange.

Previous discussions with Australand have highlighted that the proposed road carriageways have been fixed, and because of the integration of these carriageways to the overall architectural scheme, there is unwillingness to make any adjustments or permit flexibility in the road carriageway widths.

The key problem with the width of the proposed road carriageways is that they do not conform with AUSTROADS. The *AUSTROADS Guide to Road Design Part 3: Geometric Design* states that the width of a traffic lane that accommodates buses must be a minimum of 3.7m wide, excluding any other road widening that is to occur around intersections and in order to comply with *AUSTROADS Guide to Road Design Part 4A: Unsignalised and Signalised Intersections*. This dimension also excludes the bicycle lane.

The proposed 3.1m traffic lane width is considered unsuitable for buses as it does not account for bus clearances to road furniture and vegetation, and therefore is non-compliant with AUSTROADS.

It is noted that the developer has committed to abide to AUSTROADS by way of their comments on conditions of consent.

If the developer seeks to fix the road design elements in the Concept Plan, then a significant risk exists that the functionality of the bus interchange will be compromised. The developer has so far only discussed bus requirements with Sydney Buses, but Sydney Buses will not be the sole user of the interchange, as the interchange is also planned to be used for bus access into Cooks Cove, as described under the Cooks Cove TMAP, and it is not unreasonable to expect that the interchange will service a number of routes in the future. Council also considers itself a stakeholder in the planning and design of the bus interchange.

Recommendation

It is recommended that the Discovery Point Concept Plan allows for changes to the dimensions of the road carriageways that may arise from the need to comply with AUSTROADS.

1.7 Section 94 Contributions

Council welcomes Australand's acceptance in principle that the full development contributions required under Council's current Section 94 Contributions Plan should be paid.

Council is prepared to consider Australand's offer to enter into a Voluntary Planning Agreement (VPA) and has provided a letter in response to their proposal, a copy of which is attached.

However, as it would not be possible to resolve this matter in the time available prior to determination of the revised Concept Plan, Council does not wish the approval of the Concept Plan to pre-empt, via the revised Statement of Commitments, the terms of the agreement that might be agreed to in any future VPA.

Recommendation

It is recommended that the terms of the Voluntary Planning Agreement, including the proposed indexing mechanism, not be included in the Statement of Commitments.

1.8 Conditions of consent

Conditions Generally

A significant number of recommended conditions to the Concept Plan related to stormwater, traffic and public infrastructure have been sourced from the existing consents. Council believes that the developer has been in agreement with these conditions, and the conditions have also been satisfied in stages with Council receiving no negative feedback on the implementation of the conditions.

References to Council's Technical Documents

Council has undertaken significant effort to prepare Technical Documents, such as the *Technical Specification for Traffic, Parking and Access* and *AUS-SPEC 1*, in order to provide engineering designers with documents that consolidate references to Australian Standards, AUSTROADS, industry specifications and other technical documents. These documents provide for listing of any discretion that is delegated to the local authority (i.e. Rockdale City Council) by the standard or guide, and also any recommended variations, which does include recommendations for amenity improvement but also includes variations that would be in favour of developers.

Recommendation

All references to Council's Technical Documents should be retained.

References to Council's Public Domain Plan

Council does not believe that the Discovery Point Concept Plan should be approved with the Discovery Point Public Domain Plan.

Recommendation

The referencing of the *Wolli Creek and Bonar Street Public Domain Plan and Technical Manual* within conditions regarding public infrastructure should be retained.

Council's Role in Approval of Public Infrastructure

Council has had an informal arrangement thus far with Australand that has resulted in Council providing a service in respect of the road and road related infrastructure within Discovery Point. This service, which is currently provided at no cost to Australand, provides them with an authority that may be used by a Certifying Authority as evidence that conditions have been met regarding design of road and road related infrastructure. The service also satisfies any requirement applicable under the *Roads Act 1993*, *Road Transport (Safety and Traffic Management) Act 1999*, and *Road Transport (Safety and Traffic Management) Regulation 1999*.

(Note: Although the road network within Discovery Point is likely to be a '*private road*' for the purposes of the *Roads Act 1993*, the road network is a '*road*' and all related area is '*road related area*' for the purposes of the *Road Transport (Safety and Management) Act 1999*.)

Council is fully aware of Section 61 of the EP&A Regulation 2000, but nonetheless recommends the wording as recommended be retained. This would allow the developer the flexibility to continue the current arrangements, or utilise Council or an Accredited Certifier as the Certifying Authority for the purposes of a Certificate issued pursuant to Part 4 of the EP&A Act.

In the case that Australand does not want Council to continue to perform the service, the condition may be changed as proposed. However it must be noted that an Accredited Certifier is not authorised, either directly or by delegation, to satisfy any applicable requirement under the *Roads Act 1993*, *Road Transport (Safety and Traffic Management) Act 1999*, and *Road Transport (Safety and Traffic Management) Regulation 1999*. Hence, there may be legal ramifications if this path is pursued.

Recommendation

It is recommended that Council be nominated as the approval authority rather than "the relevant Certifying Authority" for approval of detailed design plans and works specifications.

Development Contributions

Recommendation

Council's previously recommended consent condition relating to development contributions should be amended as shown in **Attachment 1**.

2.0 Discovery Point Concept Plan Development Design Guidelines

The Discovery Point Concept Plan Development Design Guidelines have been prepared as, and will operate as, a stand alone development control plan, and as such they are not supported by Council.

As part of the preparation of draft Rockdale LEP 2011, Council has undertaken a comprehensive review of its current planning controls, including approximately 50 DCPs, codes and policies. Draft Rockdale Development Control Plan 2011 has been prepared so that Rockdale's future planning framework will have only one DCP which will apply to all development within the City, including major development sites.

Part 7.1 of the draft DCP includes precinct specific controls and a holistic vision for Wolli Creek that includes the Discovery Point site. Australand has made a submission on the draft DCP, in which they object to the inclusion of Discovery Point in Section 7.1, because they consider that it has specific development parameters that differ from those on other sites. Council does not agree with this position and considers that the controls in the draft DCP are sufficiently robust to achieve an appropriate development outcome on the Discovery Point site. Further, the development of Discovery Point is integral to the achievement of Council's vision for the precinct as a high quality, high density urban environment with an activity hub evolving around the railway station. Its exclusion from Part 7 would continue the fragmented approach that is evidenced in the current planning framework for Wolli Creek.

The Discovery Point Concept Plan Development Design Guidelines have been assessed against the relevant controls in draft Rockdale DCP which is included as **Attachment 2**. The following conclusions can be made:

- The vast majority of the objectives and controls in the Guidelines have been taken directly from Council's draft DCP. This suggests that the draft DCP is an appropriate vehicle for achieving suitable development on the Discovery Point site.
- Discovery Point's vision for the site as a "vibrant residential neighbourhood" is inconsistent with Council's vision and indeed, the Discovery Point Concept Plan. It is noted that the Guidelines allow fully residential uses across the whole site.
- Numerous amendments will need to be made to the draft DCP if the Department of Planning approves the Discovery Point Concept Plan. To ensure consistency with the Concept Plan the following elements of the draft DCP will need to be changed including:
 - land use strategy
 - road network and vehicular access
 - open space and movement
 - building heights and
 - street character.

- Many of the key development requirements, such as apartment mix, apartment sizes, capped number of car parking spaces etc are duplicated in the Guidelines and the Statement of Commitments. Council's approach to its planning framework, is to avoid duplication of controls across the various planning documents. The inclusion of these requirements in the Statement of Commitments is therefore sufficient.

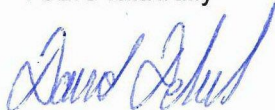
Part 7.1 of the draft DCP includes a statement that an approved Masterplan applies to the Discovery Point site, and as such, development within Discovery Point must comply with the Masterplan and the DCP. However, in the event that there is any inconsistency between the Masterplan and the DCP, the draft DCP states that the Masterplan shall prevail. This statement, plus Council's commitment to ensure that there is consistency between the DCP and the Concept Plan should provide Australand with the assurance that Council's DCP is an appropriate tool to facilitate development of the Discovery Point site.

Recommendation

It is recommended that reference to the Discovery Point Concept Plan Development Design Guidelines be deleted from the Statement of Commitments.

I trust the department will give Council's recommendations due consideration. If you would like any further details or information, please contact Margaret Fasan Council's Coordinator Urban Strategy on 9562 1683.

Yours faithfully



David Dekel

Acting Manager Urban & Environmental Strategy

Enclosed

- Attachment 1 - Revised consent conditions – Development Contributions
- Attachment 2 - Key differences between Discovery Point Design Guidelines and draft Rockdale DCP
- Attachment 3 - Letter to Australand dated 14.01.11 regarding a Voluntary Planning Agreement

Attachment 1

Proposed revised consent condition – Development contributions

Development contributions are to be paid to Council towards the provision or improvement of public amenities and services and will be required as a condition of consent for each detailed stage of the development. The amount of the contribution will be determined in accordance with the requirements of the development contributions plan current at the time of approval of each stage.

Despite this, Council has agreed to consider the proponent's offer to enter into a Planning Agreement for the provision of public amenities and services in lieu of making the development contributions required by this condition. Council will determine whether or not to accept the proponent's offer prior to, or at the time of, determination of the third detailed stage of development under this consent.

Where such an Agreement is entered into, the requirements of this condition will no longer apply to that stage of the development or any subsequent stage to the extent that the requirements are inconsistent with the Agreement.

Note: Council is prepared to accept offers to provide, as works-in-kind:

- streetscaping of the northern side of Magdalene Terrace adjacent to the site (as described in Chapter 10 of Council's current contributions plan), in part or full satisfaction of any required contributions towards streetscaping works,
- a pedestrian and cycle path along the Cooks River foreshore of the site with a link path to the Arncliffe Street / Magdalene Terrace / Brodie Spark Drive intersection (Item PC-6 in the contributions plan), in part or full satisfaction of any required contributions towards pedestrian and cyclist facilities,
- trunk drainage of Magdalene Terrace to Cooks River (Item FS-9 in the contributions plan), in part or full satisfaction of any required contributions towards flood mitigation and stormwater management works (less any offset previously given for this work), and
- works that provide flood protection to the rest of the Wolli Creek area from the flooding of Cooks River (Item FS-6 in the contributions plan), in part or full satisfaction of any required contributions towards flood mitigation and stormwater management works.

In addition, Council is prepared to consider offers to provide, as works-in-kind in part satisfaction of the development contributions:

- a pedestrian and cycle underpass beneath the Illawarra Railway Line at Cooks River and a pedestrian and cycle bridge across Wolli Creek to Waterworth Park (Items PC-3 and PC-5 in the contributions plan),
- a pedestrian and cycle underpass beneath the Princes Highway at Cooks River (Item PC-9 in the contributions plan), or
- a multi-purpose community facility within the Discovery Point site (floor space plus fit-out) (as described in Chapter 12 of the contributions plan).

Any offer to undertake works-in-kind must be made to and accepted by Council prior to the issue of the Construction Certificate for the relevant stage of the development.

Attachment 2

Key differences between Discovery Point Design Guidelines and draft Rockdale DCP

| page | Discovery Point Design Guidelines | Draft Rockdale DCP 2011 | Comment |
|------|---|---|---|
| 2 | Fig 1 only shows the extent of the Concept Plan site | Wolli Creek Redevelopment Area Map identifies all of Discovery Point site as being part of approved Masterplan | Draft DCP to be changed |
| 4 | Structure Plan shows Discovery Point site as either high density residential or as mixed use with residential flat buildings being permissible development | Structure Plan shows Discovery Point site as part of a new town centre | Draft DCP to be changed so that area to the north of the railway station and the eastern side of Brodie Spark Drive up to Discovery Point Place as high density residential. The remainder of the Discovery Point precinct will be "town Centre". |
| 4 | Vision is to create a vibrant residential neighbourhood on the Discovery Point site | Vision - Draft DCP identifies that an activity hub will evolve around the railway station (Discovery Point site) and along Brodie Spark Drive with ground floor retail, a rail interchange, street dining and cafes | The Guidelines are completely inconsistent with Council's vision for Wolli Creek, therefore no changes to draft DCP |
| 5 | Land use strategy emphasises residential uses over retail and employment uses | Draft DCP emphasises the need to create a heart and focus for Wolli Creek around the station, that is, within the Discovery Point site | Draft DCP to be changed so that Cooks River Foreshore is not included as part of the activity hub |
| 6 | Land Use Controls allow residential flat buildings as free standing buildings throughout the Discovery Point site, thereby negating any requirement for retail at ground level | Draft DCP and LEP only allow residential flat buildings in the mixed use zone in the "deferred" area which is outside of the Discovery Point site. | No changes to draft DCP |
| 7 | Fig 4 Road access and vehicular access shows road layout as per Concept Plan. Includes Table 1 Roads and Road Widths and modified vehicle access. | Draft DCP shows road layout as per approved masterplan | Draft DCP to be changed |
| 8 | Fig 5 Street hierarchy is a modification of Fig 1.4 in the Wolli Creek Public Domain Plan. Its inclusion in the guidelines is illogical as there are no controls that relate to it. | NA | No changes to draft DCP |
| 9 | Fig 6 Open Space and Cycle Network shows cycleway network as per Concept Plan | Draft DCP shows cycleways as per approved masterplan | Draft DCP to be changed |

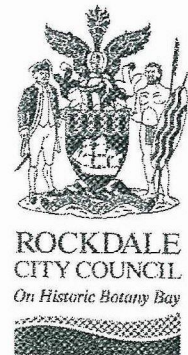
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| 10 | Fig 8 Parks and Open Space shows new neighbourhood park on Discovery Point site. | Draft DCP shows parks as per approved masterplan | Draft DCP to be changed |
| 11 | Fig 9 Building height diagram shows building heights as per Concept Plan | Draft DCP shows heights as per approved masterplan | Draft DCP to be changed |
| 12 | Development is to comply with Discovery Point Landscape Design Guidelines/Public Domain Plan | Draft DCP requires compliance with the Wolli Creek and Bonar Street Public Domain Plan | No changes to draft DCP |
| 12 | Fig 11 Street character diagram shows variety of street frontage treatments within Discovery Point site | Draft DCP shows all streets in Discovery Point as retail frontages | Draft DCP to be changed so that it includes residential, mixed use, retail and laneway street frontages |
| 13-17 | Street frontage types includes requirement that setbacks be consistent with Concept Plan | Draft DCP includes no specific controls for Discovery Point | Draft DCP to be changed |
| 18 | Provides water conservation requirements specific to Discovery Point | Draft DCP includes no specific controls for Discovery Point | Draft DCP to be changed |
| 23 | Private open space (balcony) requirements with min depth and width of 2m | Draft DCP with minimum depth and width requirements of 3m | Draft DCP to be changed |
| 23 | Communal areas should have a min area of 40% that has sunlight at 1pm on 21 June | Communal areas should have a min area of 50% that has sunlight at 1pm on 21 June | Draft DCP to be changed |
| 25 | Solar access controls require 2 hours of sunlight to living rooms and private open space to 70% of apartments in winter solstice | Solar access controls require 3 hours of sunlight to habitable rooms and at least 50% of private open space in winter solstice | Draft DCP to be changed |
| 26 | First floor of a mixed use building to be minimum height of 2.7m | First floor of a mixed use building to be minimum height of 3.3m | No changes to draft DCP |
| 26 | Max internal plan depth of a residential apartment building should be 24m | Max internal plan depth of a residential apartment building should be 18m (as per RFDC) | No changes to draft DCP |
| 27 | Roof terraces must be setback 1m from edge of building | Roof terraces must be setback 1.5m from edge of building | No changes to draft DCP |
| 27 | Development to comply with minimum acoustic requirements of BCA and BASIX | Development must have Acoustical Star rating of 5 in accordance with AAAC | To be investigated |
| 28 | Building separation as per approved Concept Plan | Includes minimum building separation requirements as per RFDC | No changes to draft DCP |
| 29 | Development to be consistent with recommendation of Wind Tunnel Study referenced in Table of Commitments | Requires wind tunnel testing for buildings of 5 storeys or more | No changes to draft DCP |
| 29 | Street lighting requirements | Street lighting requirements are included in Wolli Creek Public Domain Manual | No changes to draft DCP |
| 30 | 2% of all dwellings are to be adaptable units | 10% of all dwellings are to be adaptable units | No changes to draft DCP |
| 30 | Dwelling mix allows for 45% to | Dwelling mix allows for 30% to | No changes to draft |

| | | | |
|----|---|--|---|
| | be one bedroom | be one bedroom | DCP |
| 30 | Minimum apartment sizes required | Minimum apartment sizes encouraged | Draft DCP to be changed |
| 31 | Minimum room size requirements | Minimum room size requirements | To be investigated |
| 31 | Storage requirements as per RFDC | Storage requirement of 12m3 for all dwellings | Draft DCP to be changed |
| 32 | Minimum and maximum car parking requirements | Minimum car parking requirements – slightly more generous for visitor parking, retail and bikes | To be investigated |
| 32 | Maximum basement level car parking projection to be 1.5m | Maximum basement level car parking projection to be 1m | Draft DCP to be changed |
| 36 | Lifts - Number of units accessible from a single lift is 12 | Lifts - Number of units accessible from a single lift is 8 (as per RFDC) | No changes to draft DCP |
| 36 | Common corridors are to have a minimum width of 1.6m | Common corridors are to have a minimum width of 2 m | To be investigated |
| 37 | Mixed Use – residential uses are permitted on the ground floor of buildings | Draft LEP and DCP do not permit residential uses on the ground floor within the Discovery Point site | No changes to draft DCP |
| 37 | Control to provide a minimum of 9,000m2 of non-residential uses in Discovery Point site | No controls included in draft DCP | No changes to draft DCP – referenced in Statement of Commitments, so not necessary in DCP |

14 January 2011

Our Ref: F10/9
Contact: Stephen Kerr 9562 1737

Nigel Edgar
General Manager
Australand Residential NSW
PO Box 3307
RHODES NSW 2138



Dear Nigel

Re: Developer Contributions – Discovery Point

I refer to your letter dated 6 December 2010 setting out an alternative proposal for the payment of Developer Contributions for the remaining stages of Discovery Point. I note also that the proposal has been put to the NSW Department of Planning in a revised Statement of Commitments for your Part 3A application.

Council appreciates that Australand would like greater certainty regarding the Developer Contributions to be paid during the life of the Discovery Point development project. In this regard Council would be pleased to consider entering into a Voluntary Planning Agreement (VPA) on the following basis:

- The VPA will be executed prior to the determination of the third Project Application or Development Application.
- The basis of the VPA will be the developer contributions that would otherwise be required by the Rockdale Section 94 Contributions Plan 2004 at the time the VPA is executed.
- The developer contribution rates specified in the VPA will be indexed in accordance with the Consumer Price Index (All Groups Sydney) (CPI).

On the issue of how the contributions are indexed, Council does not believe it is reasonable to cap the index to 3% and in so doing transfer inflation risk to Council and the community. Otherwise, Council is prepared to accept that the land component of the developer contributions will be indexed in accordance with the CPI, whereas at present they are indexed according to annual valuations commissioned by Council.

Please do not hesitate to contact me if you wish to discuss this matter. Otherwise, I look forward to progressing the VPA.

Yours sincerely

Stephen Kerr
Director City Planning & Development

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