

Attachment 7: Summary of Submissions regarding the Special Rate Variation – Objecting and Supporting

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	Supportive		
Fulfilling the community's vision in Imagine Lismore	1. Due to our community expressing strong support for the natural environment in Imagine Lismore, it is appropriate that the community contribute funds through rates.	Noted	No amendment recommended
Council's current minimal spending on the environment	2. Council currently spends less than 1% of its annual budget on the environment, which does not meet community expectations. It is time to adopt a Biodiversity Strategy that has recurrent funding so Council can act to protect habitat, koalas, farmland, rivers and remove weeds and wild dogs. 3. Council rightly prides itself on its environmentally sustainable achievements. In this regard, it is earning a wide and quite enviable reputation. However, Council allocates less than .05% of its expenditure to the environment.	Noted	No amendment recommended
Enabling Council to leverage grant funding	4. Environment Levees are matched with funding from state and federal departments and can grow funds substantially, giving significant environmental benefits and local employment and jobs growth. 5. The biodiversity rate can be used to leverage further funding from government and other organisations.	Noted – Action 39 of the BMS proposes Council continue to seek grant funding opportunities. Additional investment into Council projects would enable Council to leverage grant funding, as most grant funding bodies require Council to contribute both cash and in-kind resources to grant applications.	No amendment recommended
Alternatives if SRV not approved	6. If the SRV is not supported and finally approved, we believe strongly that the council should make the funds available to implement the BMS from existing funds. The Council rightly prides itself on its environmentally sustainable achievements, yet allocated less than 1% of its expenditure specifically to the environment. Furthermore, the \$500,000 Council is seeking for the SRV is equivalent to about 037% of Council's existing budget. 7. It is our opinion the Strategy must be implemented. We owe it to future generations to make what is a relatively small financial commitment to keep our part of this Region healthy and productive. 8. The significant beneficial impacts of the projects	Noted – During development of the BMS funding options, including the use of Council's existing budget, were considered. If Council were to allocate funding from its existing budget it would significantly impact on Council's services provided under its existing budget. Council is currently conducting a Service Review. Service Reviews use data to understand the community's need for services and how efficiently and effectively these different services are being run. Using this information, councils can then understand what changes they	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>encompassed by the Strategy will, in my view, more than outweigh the very minor increase in rates. However, if the SRV is not supported and approved then I firmly believe that Council should make the funds available for implementation from existing funds.</p>	<p>need to make to their service delivery in order to provide benefits to everyone involved. The objective of a Service Review is to ensure 'value for money' for ratepayers, whilst helping to identify the mix of services and funding arrangements that best meet the community's needs. This review could provide a future opportunity to fund the BMS. However, the Financial Plan also flags the potential of Council seeking a future SRV of \$2mil per year from 2018/19 for renewal of infrastructure (predominately for roads) meaning it is unlikely this Service Review would find sufficient savings to support the BMS.</p>	
Resource commitment is needed	<p>9. Making plans is not in itself enough and requires a resource commitment if the goals of any plan are to be achieved.</p> <p>10. Given managing the environment well is of such long-term significance, the funds must be quarantined for the sole purpose of the BMS.</p>	<p>Noted – Page 51 of the BMS includes a 10 year budget for the BMS which includes allocation to specific actions. Allocation of resources within each task would be done on a project basis as the action is developed and implemented.</p> <p>This budget table would also form the basis for Council's application to IPART, and if approved IPART would hold Council accountable for delivery of its proposed actions against the SRV.</p>	<p>That the budget table on page 51 of the BMS is expanded to demonstrate the yearly program funding breakdown, and that this is demonstrated in an additional Appendix.</p>
Everyone should pay – including businesses	<p>11. SRV should be applied to businesses properties also as they would also benefit through employment and profit</p> <p>12. We think the rate increase should be paid by all ratepayers</p> <p>13. I have more land for native animals and plants to foster biodiversity and so you want to charge farmland ratepayers more than anyone else? People in towns or villages or farms should each pay the same amount.</p> <p>14. Farmers already contribute a large percentage of council's rate income.</p>	<p>On 11 November 2014 Council decided to exclude businesses from the proposed SRV as they incurred a Special Business Rate Variation in 2013.</p> <p>The proposed SRV based on land value. The higher land values associated with many large farms implies that these properties would be charged a higher rate than the average town or village property. Whilst 72% of the ratepayers impacted are located in the urban/village areas, about 80% of Lismore's biodiversity values are</p>	<p>No amendment recommended</p> <p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		located in rural areas. Accordingly, 71% of the SRV (i.e. 3.6M over 10 years) is to be invested in on-ground works or related to on-ground works in rural areas.	
Affordable	<p>15. The proposed SRV is a small amount to contribute towards implementation of the BMS</p> <p>16. The rate increase and investment in the BMS will ultimately be of financial benefit to the region and business.</p> <p>17. The sums of proposed rate increases are minimal - in fact negligible in terms of the benefits of the outcome.</p>	Noted	No amendment recommended
Within existing budget	18. The Northern Rivers Greens expect Lismore City Council to budget for environmental projects and are very concerned this responsibility has not been met. It is now up to the community to provide crucial environmental services with a rate increase to fund the Biodiversity strategy. However, the Northern Rivers Greens accept the proposed 50 cents a week is affordable and will provide jobs and practical environmental outcomes.	Noted – see comment 9 for the corresponding response	See comment 9 for the recommended change
Urban ratepayers will pay more which will reduce burden on rural landholders	19. Urban ratepayers will contribute the majority of investment funds for works on farms in rural areas or on urban reserves. This is likely to lower any rate burden on rural landholders.	Noted	No amendment recommended
SRV is a reliable funding source	<p>20. The proposal to raise funds from the rate payers would provide a secure resource into the future to allow for long term action to be implemented.</p> <p>21. Lismore needs a Biodiversity Strategy and the ongoing funds to implement it. A levy (rate increase) will fund important works on public and private land in rural urban areas. A small price to pay for a long term strategy for our plants and animals and local jobs.</p>	Noted	No amendment recommended
BMS & SRV will provide assistance to those already	22. Northern Rivers Wildlife Carers (NRWC) members already contribute from their own pockets to the preservation of biodiversity in the Lismore LGA and consequently support the proposed rate increase.	Noted	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
investing in biodiversity			
Work in the urban area will be very well received	<p>23. Appreciate the recreational facilities and parkland LCC has developed the past 25yrs.</p> <p>24. We realise much more work needs to be done to support and promote the natural beauties of our city. We are happy for a special rate variation to help promote new fauna and flora projects and maintain existing sites.</p>	Noted	No amendment recommended
Worth the investment	<p>25. We love our region and we need to contribute to sustain its beauty</p> <p>26. Some say that this rate increase bears an unnecessary impost, but I would reply that our natural environment is an asset, and is as deserving of measures of effort and finance as would be bestowed on any other asset.</p> <p>27. The far North Coast as the green heart of Australia which needs to be cared for and protected for the benefit and enjoyment of our current generation as well as future generations.</p> <p>28. The rate increase is a small price to pay for greater input towards increase sustainability of our natural resources. The water ways, the bushland, wetlands, and the regeneration of degraded lands are important for every council and its constituents to address.</p> <p>29. It is a small amount to contribute towards this. There are already some fantastic examples of the good this kind of financial injection can do to – E.g. plantings along Hollingsworth creek and North Lismore. People should remember what all that looked like before the work was started. I would love to see more of these types of projects around Lismore.</p> <p>30. Implementing the BMS through an SRV is an investment into the future of the Lismore LGA and will provide us with both tangible and intangible benefits</p>	Noted	No amendment recommended
Long overdue and will bring Council up to date with other	<p>31. Excellent move, long overdue, happy to pay such a tiny increase in annual rates to support habitat protection for both animals and humans. This will also improve land values and standard of living in Lismore Shire.</p>	Noted	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
Councils	<p>32. I point to other council areas in the region, such as Byron Shire Council where the adoption of an Environmental levy has led to the development of long term environmental works with appropriate follow-up measures ensured through recurrent funding. The time has come for Council to gain recurrent funding to continue to consolidate and expand on those works with a shire wide strategy to maintain and protect Biodiversity in the area.</p> <p>33. It is my expectation that a BMS framework will bring LCC into line with other similar programs, in particular the River Health Grants Program which is currently being implemented by Tweed Shire Council.</p>		
Investment must include in 'green zone' as mapped	<p>34. I fully support a 'special rate variation' on the condition that Funds raised would go towards improving the biodiversity of the Lismore Council area of operations including areas (Green Zones 44% of the study area) not covered in the Lismore City Council DRAFT Biodiversity Management Strategy supporting documents.</p>	Noted – This is proposed in Action 12 of the BMS.	No amendment recommended
Rate pegging should not apply	<p>35. For the period of Strategy (if adopted) I believe that the local tax should not be allowed progressively increase as a consequence of calls for additional staff, resources etc. to implement it. In this regard I believe there should be a transparent 'breaking' mechanism within the final Strategy to ensure that the local tax does not incrementally or stealthily increase during its intended life.</p>	If a Special Rate Variation for the BMS is approved and introduced, the amount levied to ratepayers each year beyond Year 1 would be increased by the rate peg percentage determined each year by the NSW Independent Pricing and Regulatory Tribunal (IPART). For 2014/15, the rate peg percentage was 2.3%.	No amendment recommended
Objections			
Everyone should pay	<p>36. Do not support the BMS on the grounds that funding it through only rural ratepayers is unfair</p> <p>37. It would also be unfair in the current set out, farmland rate payers pay twice that of urban rate payers. If the whole community is to benefit then everyone should pay the same amount.</p> <p>38. Does Lismore City Council not see it's Cane Growers as an Industry worth investing in? Our Cane Growers are Business People too. With the current BMS and SRV Farmland and Residential/Rural will be hit the hardest. We</p>	<p>The proposed SRV would apply to all three residential rating categories: Farmland, Rural Residential, and Urban/Villages Residential.</p> <p>The SRV would apply evenly between all three rate paying categories, however as it is calculated on land value. So if a landholder has a higher land value then their SRV increase would be higher. The average farmland land value is \$375,000 meaning the average cost</p>	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>will be expected to pay the new rates and still carry out the work required for LCC to commit to its promise in the BMS</p> <p>39. The special rate variation brochure that farmland residents were going to have to pay the largest rate increase if this plan goes ahead.</p> <p>40. We question why, as it is stated in the "BMS" Fact sheet received, that this "Special Rate Variation" is solely placed on rural rate payers to "raise an ongoing \$500 000 per annum" for LCC. Why should already struggling primary producers bare the cost of the entire "1.9% increase" across the whole Lismore City Council area?</p> <p>41. Rural industries have been suffering for a long period with low commodity prices and high input costs. More thought should be put into non-contributing members of the community and a way they may contribute to a project of this kind.</p>	<p>would be about \$50/year. Comparatively the average land value for urban and villages is \$113,000 meaning the average cost would be about \$25/year.</p> <p>Agricultural businesses are generally rated as farmland as opposed to businesses. Businesses pay substantially higher rates than farmland and residential ratepayers.</p> <p>Also refer to response to points 13 and 14 above. Investment through the proposed Rural Landholder Initiative will mean more opportunity for rural landholder to access assistance and potentially relieve any burdens of land management.</p>	
	<p>42. The SRV is inequitable as the benefits of biodiversity maintenance are for all individuals, not just rural/rural residential rate payers.</p> <p>43. Businesses - Inner CBD, Urban, Other and Nimbin are all high end users of Lismore Council services. They make profits and are in a better position to pay the levy than many local ratepayers.</p> <p>44. I believe that biodiversity management (weed, erosion control) is a routine part of councils duty and any rate increases necessary for councils routine duties should be implemented across all rate paying categories (with the possible exemption of charitable organisations).</p> <p>45. The three areas that are to be levied are actually the ones already contributing the most towards many of the objectives of the BMS, for example, providing habitat for native birds and animals. Whereas business, who have been specifically exempt from the levy, would generally cause the most damage and provide the least benefit to our environment generally.</p> <p>46. Given that the environment emerged as the community's number one priority in the Imagine Lismore community</p>	<p>Noted – During development of the BMS funding options, including the use of Council's existing budget, were considered. If Council were to allocate funding from its existing budget it would significantly impact upon the current services provided within Council's existing budget.</p> <p>Council is currently conducting a Service Review. Service Reviews use data to understand the community's need for services and how efficiently and effectively these different services are being run. Using this information, councils can then understand what changes they need to make to their service delivery in order to provide benefits to everyone involved. The objective of a Service Review is to ensure 'value for money' for ratepayers, whilst helping to identify the mix of services and funding arrangements that best meet the community's needs. This review could provide a future opportunity to fund the BMS. However, the</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>consultation process, surely all of the ratepaying categories would consider it fair to contribute and not burden a small portion of the LGA with the whole cost.</p> <p>47. As we all are responsible for the pressures placed on the environment, why then are the financial burdens placed on a select few.</p> <p>48. Business owners get 3 free garbage bins supplied by Council. It is ludicrous that they be excluded from the special rate.</p> <p>49. Making rural residents pay for a project which probably had beginnings in LCC and the town of Lismore is grossly unfair to rural rate payers.</p>	<p>Financial Plan also flags the potential of Council seeking a future SRV of \$2mil per year from 2018/19 for renewal of infrastructure (predominately for roads) meaning it is unlikely this Service Review would find sufficient savings to support the BMS.</p>	
Should be paid for within existing budget	<p>50. If Council thinks the BMS is a "number one priority" according to the 'Imagine Lismore process', then Council should allocate its existing financial resources more appropriately.</p> <p>51. Council should become more efficient in your business/budget plans - simply taking more money and failing to reorganise priorities within an existing budget is unacceptable.</p> <p>52. Funding is provided for matters you would expect council to be already responsible for e.g. Roadside vegetation management, implementing components of sport and rec plan, tourism Initiatives.</p> <p>53. The approached of simply taking more money and failing to reorganise priorities within an existing budget is unacceptable.</p> <p>54. Council states that one of the aims of the BMS is to "build strong partnerships, in particular with rural landholders", if this is true then use the rates we already pay to fund this strategy.</p> <p>55. I believe that rather than increasing rates again, council should implement the 35 actions it can afford to implement with councils existing resources and implement the other 28 when council can afford it.</p> <p>56. Other surrounding councils deal with biodiversity within their current budgets so why not Lismore?</p>	<p>Noted - During the development of the BMS Council considered the option of using existing funding to implement the BMS. It was concluded that this would impact significantly on the services Council was currently able to provide. On 11 November 2014 Council resolved to consult the community on a special rate variation as all other funding options were not considered to deliver the reliable, long-term funding needed to deliver long-term biodiversity change in the Lismore LGA. Council will consider results of the community consultation to assess the direction of funding for the BMS.</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>57. It is the responsibility of Council, like all of us, to work within our budget limitations, that is what we expect of our elected representatives.</p> <p>58. Ratepayers in our council area should not be burdened with another rate increase to address a problem that has historically always been the responsibility of Council management to maintain as part of their budget.</p> <p>59. A special levy is too easy for future councillors to abolish. Hence I would argue that the strategy should be funded through existing revenues.</p>		
Other funding sources should be found	<p>60. The rate increase is designed to supplement stated withdrawn federal funding which I believe the Council should lobby to reinstate.</p> <p>61. It seems the whole BMS was based on a previously approved Federal Government Grant which has now been withdrawn. If Council was seriously looking for "reliable, long-term funding" why would a Government Grant even be considered in the first place?</p> <p>62. Several other NSW councils have used government grants to put these plans in place.</p> <p>63. This "consultation" strategy seems to be a knee-jerk reaction to having had funding from a Federal Government Grant removed. Council is now seeking to place the financial burden on ratepayers who would otherwise not have had to pay and did not elect to have the BMS created in the first place.</p>	<p>In Activity 3 of the current <i>Imagine Lismore 4 year Plan</i> Council proposes to Implement the BMS through an application for \$4 million under the Biodiversity Fund, a Commonwealth Government grant funding program. The 4 year plan also states that if this application was successful it would remove the need for funding in 2015 & 2016. Council applied for this funding and the application was unsuccessful. This meant that besides \$60,000 to develop the BMS no funding was allocated towards implementing the BMS. Discontinuation of the Biodiversity Fund grant program also meant that Council did not have the opportunity apply again in a future grant funding round. Therefore Council commenced its exploration of funding options for the BMS including a Special Rate Variation.</p>	No amendment recommended
	<p>64. Council's covering letter states that Lismore has a "unique natural environment" and requires a BMS. How many other Local Government Areas also have a "unique natural environment" and will they also be seeking to introduce a BMS and SRV? Lismore City Council should not act alone</p>	<p>LCC is not acting alone, but utilising the experiences of others to develop its BMS. LCC assessed its options to provide environmental leadership (as the community envisaged in the <i>Imagine Lismore</i> consultation process). In doing so LCC assessed what other Council were doing in the region. Numerous Councils have had Biodiversity Strategies for many years for example:</p> <ul style="list-style-type: none"> ○ Coffs Harbour Biodiversity Action Strategy 	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		2012-2030, supported by a \$1mil per annum SRV for implementation <ul style="list-style-type: none"> ○ Clarence Valley Council Biodiversity Management Strategy 2010 ○ Byron Biodiversity Conservation Strategy 2004, supported by a 2% SRV for implementation ○ Bellingen Shire Council SRV in 2005 to implement priority environment projects ○ Tweed Shire Council increased general rates by 25% over 4 years with some funding allocated towards implementing environmental projects. 	
	65. The BMS also includes the "Koala Plan of Management". This KPoM has been around for years. Why would Council now be seeking a SRV to fund the KPoM as well as the BMS, literally years later?	<p>The KPoM was approved by the Department of Planning and Infrastructure in 2013. At the time the plan was drafted, recurrent budget was allocated to implement the plan and since then Council has not provided recurrent funds to implement the plan.</p> <p>The BMS proposes to encompass the implementation of actions in the KPoM that require ongoing funding, as implementation of this Plan would contribute significantly to the enhancement of biodiversity values in the Lismore LGA.</p>	No amendment recommended
	66. We believe that rather than a rate increase, incentives for people would achieve a better and quicker result.	<p>The BMS is based on an incentive and education based approach to assist and encourage the community to enhance the biodiversity values in the Lismore LGA. However implementing any incentives program requires sufficient resources and long-term investment provides more certainty for landholders as well as more long-term benefits for biodiversity.</p>	No amendment recommended
	67. If Lismore City Council is spending 23% less than other Councils on the environment then where are funds being spent currently?	<p>This figure of LCC spending 23% less than other councils on the environment was calculated from results published in the 2012/13 NSW</p>	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		<p>Government Comparative Information on NSW Local Government Report. This report states that LCC spends \$182/capita on the environment compared to the NSW local government average of \$237/capita.</p> <p>This report bundles spending on the environment with waste management so it is difficult to assess exactly how much other Council's invest into environment projects, excluding waste. We know that Council currently spends approximately 0.5% of its annual budget on environment related projects, including wages.</p>	
Unaffordable and additional burden to ratepayers	<p>68. The proposed SRV does not take into account existing NSW and Industry levies that relate to environmental management.</p> <p>69. The SRV would be an additional cost on top of the Federal Governments additional 0.5%/litre levy on petrol and the additional \$7 Medicare co-payment</p> <p>70. Young families already have their budgets stretched</p> <p>71. The SRV should be means tested for those that are on the pension and have low incomes</p> <p>72. People of fixed income won't be able to afford the rate increase</p> <p>73. The current LCC rate structure are one of the highest in the state with the LCC existing compulsory business special levy for 2 of our properties again puts our business's at a distinct disadvantage</p> <p>74. Rates are already far too high for a small country town and when you take into consideration the local population is predominantly made up of low to middle income earners in a poverty stricken area.</p> <p>75. It is hard to imagine Rural Ratepayers will support the proposal as past experience tells us it is hard enough to earn a living without a further burden. Maybe your proposal would be better suited to Work for the Dole.</p>	<p>Noted – The purpose of LCC's community consultation process is to assess the community's willingness and capacity to pay for the proposed SRV. The capacity of landholders will be variable and will be considered in Council's decision making process on whether to pursue with an application to IPART.</p> <p>If council resolves to apply to IPART for the SRV then Council would be required to include in its application the following considerations:</p> <ul style="list-style-type: none"> ○ Size of Council ○ Resource of Council ○ Size (both actual \$ & %) of increase ○ Current rate levels and previous rate rises ○ Purpose of special variation ○ Community demographics ○ Any other relevant matters 	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>76. Annual increases already applied to LCC Rates are excessive and demanding, more so if you are paying for more than 1 property.</p> <p>77. If you look at the exceptionally high unemployment rate here (see attachment showing Dept of Employment figure of 10.5%) you will get an idea of how tight many local people's financial situations really are.</p> <p>78. This project puts an added burden on low income families and pensioners on top of the increased general rate and water and garbage charges, also there is a very good chance that the pension rate rebate will be discontinued this year meaning I will have to find close on \$500 extra.</p> <p>79. LCC has a high number of Low Socio-Economic Groups in its region, who are currently struggling to pay the rates that are currently set by LCC. (which are substantially higher than neighbouring councils) This was confirmed in a recent article in the Northern Star which outlined the large amount owing to local councils in overdue rates.</p>		
Objection to increased regulation to framers	<p>80. Biodiversity Management Strategy suggests even more policing of farmers to inhibit the way they may wish to utilise their land. Tam of the opinion that Lismore City Council spends enough on "greening" of the area.</p> <p>81. To want to now put in a special rate variation to pay for another set of rule to tie the hands of rural and residential rate payers is beyond a joke and simply rubs salt into the wounds.</p> <p>82. The BMS would be covered in essence by the Local Environmental Plan. The BMS would be just more red tape to be complied with making it harder for businesses to compete on the world market with Asian countries which have none of this legislation.</p>	<p>Noted - The BMS does not propose further regulation to landholders; rather it aims to deliver an incentives and education based program for rural landholders. Although the BMS discusses the use of regulation as a tool to manage biodiversity, it should be noted that zoning is an LEP matter dealt with by separate LEP processes.</p> <p>It should also be noted that the Parsons Brinckerhoff final report is yet to release their final report informing Far North Coast Councils of the future use of environmental zones.</p>	No amendment recommended
Rural landholder Initiative	<p>83. "Rural landholder initiative will encourage landholders to progress up the biodiversity ABCD ladder" Cane Growers are already "Innovative Farmers" what incentives are being offered to these landholders, if the BMS and SRV comes in to play Cane Growers who are currently "innovative famers" will be asked to subsidise those landholders who are not.</p>	<p>The BMS recognises that managing biodiversity is for the benefit of the whole community in terms of ecosystem services providing healthy soils, water and landscapes. This is the case even if those areas are not on an individual's property.</p>	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>Please explain why as LCC rate payers Cane Growers in this region are expected to finance the LCC's Staff development and subsidise programs for landholders and farmers who are not "Innovative Farmers".</p> <p>84. We believe that rural properties having either Land for Wildlife or E zones within their boundaries should be exempt from the rate increase. This should even go further and an incentive be created to exempt those lands set aside for purely environmental purposes be granted a rate exemption.</p> <p>85. Any rate rise will only add to farmer's struggle to eke out a living</p>	<p>The BMS proposes to rewards landholders managing and enhancing high conservation value areas on their properties and to encourage others to do the same through education and incentives.</p> <p>Rewards to landholders will be through providing rate rebates where high conservation value areas are being enhanced and managed. This would be based on eligibility criteria. The ABCD Framework is likely to form the basis of Council's education program as a self-assessment method for landholders.</p>	
<p>Council is seeking to invest in what is not its responsibility</p>	<p>86. BMS actions are either already in the responsibility of Council, in which case there is already funding for such action, or the council is seeking to increase its portfolio into new areas for which it has no mandate.</p> <p>87. Funding is provided for matters you would expect council to be already responsible for e.g. Roadside vegetation management, implementing components of sport and rec plan, Tourism Initiatives etc.</p> <p>88. This project would be unnecessary expenditure when there are many other issues that Council firstly needs to address in the City of Lismore: Grass verges should be kept cut regularly, pot holes should be filled more regularly, and general cleaning of city streets and sidewalks should be done to improve the City's attractiveness.</p>	<p>Noted – The majority of actions proposed in the BMS associated with Council's operations are proposed to be implemented under Council's existing resources. However the SRV would enable on ground action through the implementation of action in urban and rural areas.</p> <p>The Local Government Act 1993 incorporates ecologically sustainable development, including biodiversity conservation, as a key aspect of local government operations. Development of a BMS will fulfil this key aspect of local government operations. Though the Imagine Lismore process, the community is telling Council that biodiversity should be part of its core business.</p> <p>Actions proposed in the BMS are linked to recommended approaches and actions in guiding regional documents. These documents (see section 4.2 of the BMS) recommend a diversity of actions to enable the wider</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		community to enhance biodiversity whether it be through increased appreciation or the undertaking of on ground works.	
Money should be invested into roads and infrastructure	<p>89. Ratepayers funds would be far better spent on services and infrastructure than trying to take control over ratepayers lives and property.</p> <p>90. Council should concentrate on fixing its roads, as well as other services such as sewage, city parks and roadside maintenance</p> <p>91. Far better to spend money on reopening the Lismore Lake pool and reinvigorate the Lismore Lake</p> <p>92. LCC is not a local government area that has a financial footing to meet its primary role roads, rubbish water & sewage & importantly economic development let alone a BMS</p> <p>93. Council throws away money on pet projects instead of maintaining and upgrading basic services such as sewerage treatment, or prioritizing the "beautification" of the city centre over the practicality of clear sightlines through high traffic zones.</p> <p>94. This funding should be spent on more road maintenance, and improved traffic flow at the Hollingsworth Bridget bottleneck during peak hour periods.</p> <p>95. The roads are neglected - Nimbin is a much visited destination, and the Nimbin Road is in an appalling state, causing vehicle damage, and safety issues.</p> <p>96. I am willing to double the proposed rate increase to bring our roads up into the 21st century. For a regional city I can not believe most of our local roads still have table drains, instead of curb and gutter and a quality road surface that this regional city deserves. visitors to our city must think we are still living in the 1960s, come on Lismore city council lets get act into gear and stop wasting money on theses stupid ideas and get basic infrastructure in place before we worry about a biodiversity strategy.</p> <p>97. LCC has a poor history for providing basic services to residents in the rural residential zoning. E.g.: poor upkeep of</p>	Noted	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	non-sealed roads and maintenance of minor sealed road; Other basic services like sewage; No waste collection to a large number of rural/residential residents unless on the main rd.; No assistance provided for water collection for household use.		
Roadside management	<p>98. How about the Council clean up their roadways of noxious weeds, plants, and rubbish that they have allowed to grow over many years of inactivity. And how about giving an incentive to those landowners that are maintaining their roadside, without the need to increase their rates.</p> <p>99. Why should rural landowners pay a special rate when Council does nothing to clear lantana, Crofton weed and other noxious weeds from the sides of the road which eventually go onto private land?</p> <p>100. Our weed problems mainly Giant Parramatta grass, have come about by Council not controlling this pest, which impact the profitability of the grazing industry, in its roadsides. At the moment it has proliferated through the Council's mowing strategy. Council should look after its own back yard, before trying to burden rural ratepayers.</p>	<p>Noted – <i>Action 17 Standard Operating Procedures</i> and <i>Action 16 Training</i> propose to update and develop Standard Operating Procedures for best-practice roadside weed management to avoid and reduce the spread of environmental and noxious weeds. This will then go through a process of integration into Council's on ground procedures through training, monitoring and audit.</p> <p>These actions will involve the Environmental Strategies Team working closely with LCC Infrastructure Services, Roads, Parks and Works areas to ensure that changes are developed and implemented consistently.</p>	No amendment recommended
Money should be spent elsewhere	<p>101. The BMS budget shows that:</p> <ul style="list-style-type: none"> Only about one third of the budget will go to work on the ground/in environment Too much money about two thirds of budget going to non work on the ground matters as stated in the 10 year funding allocations. 	<p>Page 51 of the Draft BMS provides a budget summary for implementation of the BMS – this includes any funding achieved through the proposed SRV.</p> <p>This budget summary shows that most investment will be allocated towards on-ground works whether it be undertaken by Council or in partnership with landholders and other stakeholders.</p>	No amendment recommended
	<p>102. I would like to see the money being spent, where it is raised. since rural properties will be paying a higher amount of money due to the larger land sizes, how about spending that money back on the larger properties, such as helping with river bank planting and clearing, and advice and subsidies for pest control remedies, as well as teach people to care for their own properties, and show people that you LCC can</p>	<p>About 28% of the ratepayers potentially impacted by the proposed rate rise are located in rural areas (rated as farmland or rural residential). The remaining 72% area rated as urban and villages (urban residential).</p> <p>The draft BMS recognises that much a Lismore</p>	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	take care of your own land.	biodiversity values are in these rural areas. Therefore the BMS proposes to allocate about 71% of the SRV towards implementing actions in rural areas. This included riverbank restoration and the management of weeds and pests.	
	103. Landcare is already doing your job. Surely it would be wise to financially support this project and support those people with the knowledge and skills they already have.	Noted - The draft BMS flags many opportunities for Landcare groups and overarching groups to partner with Council and to implement on-ground projects.	No amendment recommended
Money wasted on unnecessary things	<p>104. We consider the proposed BMS a higher priority than skeleton boats in the road and art gallery upgrades, and would sooner see funding cut from these projects than our own rates increased</p> <p>105. The BMS is long overdue but as long as Council can spend fast amounts of money on an atrocious sculpture and obscuring traffic for 3 months, I can't see why we should foot the bill.</p> <p>106. Council should stop spending money on expensive signage, raised cement kerbs and arts projects</p> <p>107. Perhaps a look at LCC's bureaucratic money wasting efforts would help solve council's fiscal problems</p> <p>108. Council should stop spending money on low priority issues. E.g. electric cars and new art galleries, and get back to the core services.</p> <p>109. Council should stop spending money on Sculptures like the one on Woodlark Street</p> <p>110. Council does not appear to be using the present rates wisely. For example that monstrosity of a "sculpture" at the corner of Woodlark and Molesworth Streets.</p> <p>111. The recent publicity over the complete waste of council funds on the "boat skeleton" in Woodlark Street and the proposed Art Gallery may indicate to those ratepayers that are affected by this BMS that Lismore City Council may not possess the financial management required in the present economic climate.</p> <p>112. If council wish to fulfil its responsibilities in the management of its natural assets, funding could be achieved by reducing</p>	Noted	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>waste within its own resources i.e. Improve productivity, downsize the car fleet (especially personal use), and review staff levels</p> <p>113. If the council improved in its general performance for ordinary rate payers and gave some perception of value for money, there might be more support for the SRV.</p> <p>114. Council introduced a stormwater levy in 2007 and there has been little to no evidence of any projects that this money has funded.</p> <p>115. Three major unnecessary expenses using my rates were; the 5 signs indicating we are in Lismore (I was told, at a cost of \$35000), a street sculpture that was completed for \$350000 and a playing field with demountable buildings at a cost of 10 million dollars. What benefit or return have these expensive projects realised for the council area and benefited the residents.</p>		
No accurately stating the impact on ratepayers	<p>116. Council states it is looking for "reliable, long-term funding" but the "fact sheet" is very vague as to whether this SRV is meant to be a temporary or permanent cumulative increase. If the Draft BMS has a "10-year budget" will the increase be cumulative for the next 10 years? Council has only provided the average amount of the rate increase for one (1) year, but IPART states Council should be detailing the total cumulative amount over four years.</p> <p>117. The "consultation" also fails to mention that the SRV is cumulative i.e. 1.9% increase year on year, not just a one off increase.</p>	<p>The SRV proposed would be a once off increase as opposed to an incremental increase over a number of years.</p> <p>However the proposed SRV, like all other general rates, would be subject to any annual rate pegging as set by the NSW Government.</p>	No amendment recommended
Money will not be spent where it is needed	<p>118. How much of the extra money raised will actually be spent directly on time and materials involved in physical biodiversity programs? The proposal which makes it obvious the vast majority will go on consultancy.</p> <p>119.</p>	<p>Many of the actions in the BMS may involve the engagement of contractors/consultancy to conduct on ground works. However this is standard practice with implementing on ground biodiversity related actions.</p>	No amendment recommended
	<p>120. Concerns were raised in relation to "part of the SRV is to ensure that new developments are ecologically sustainable." Should Council rely on farmers, rural residents and urban villages to finance projects that Council and Developers</p>	<p>Noted – The majority of actions proposed in the BMS associated with Council's operations are proposed to be implemented under Council's existing resources. However the SRV would</p>	That the budget be amended to exclude the engagement of a 'Change Management

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>should be obliged to carry out?</p> <p>121. The Draft BMS outlines that it will spend some of this SRV on: "Councils developing review processes, Staff Training, Developing Biodiversity Framework, Support the Community to improve Biodiversity, Assist Landholders to manage Biodiversity and Build Partnerships with the community." It would appear that a substantial portion of the SRV will disappear with administration fees.</p> <p>122. Surely the "Review, update and development of Council processes, procedures and associated staff training is an on-going, day to day administration function? Why should this proposed levy be utilised in this area?</p>	<p>enable Council to undertake on ground action through the implementation of actions in urban and rural areas.</p> <p>Action 18 could be dealt with within Council's existing resources. This is especially relevant as Infrastructure Services and Environmental Strategies will be working closely with operations to achieve Action 18.</p>	<p>Officer' for three years, and that funding in these years is distributed to on-ground implementation of the BMS.</p>
	<p>123. My concern is that any funds raised will be redirected to council administrative costs. How will the funds be quarantined and how will council be accountable for improved biodiversity on the ground.</p>	<p>Noted – Page 51 of the BMS includes a 10 year budget for the BMS which includes allocation to specific actions. Allocation of resources within each task will be done on a project basis as the action is developed and implemented.</p> <p>This budget table would also form the basis for Council's application to IPART, and if approved IPART would hold Council accountable for delivery of its proposed actions against the SRV.</p>	<p>That the budget table on page 51 of the BMS is expanded to demonstrate the yearly program funding breakdown, and that this is demonstrated in an additional Appendix.</p>
<p>Landholders taking more responsibility</p>	<p>124. Each landholder should be responsible control their own noxious weeds, especially the Indian Coral trees. Council should send out notifications to anyone not doing so</p>	<p>Noted - Council currently devolves its responsibilities under the Noxious Weeds Act to Far North Coast Weeds. This includes the responsibility of compliance of landholders under the Noxious Weeds Act. However it should be noted that due to the large scale issue of weeds in the region this investment is not sufficient enough to address all weeds listed under this Act as well as undertake monitoring and compliance.</p> <p>The draft BMS recognises that landholders, including council, need to take responsibility for managing noxious weeds. The draft BMS aims to achieve this through implementing an</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		education and incentives program to assist landholders to undertake these actions.	
Landholders already look after their land	<p>125. Land owners who have creeks/rivers through their properties look after them – the water is their lifeline. City folk can pay the SRV to look after theirs.</p> <p>126. Most of us in these areas already care for wildlife, regenerate native habitat and eradicate noxious weeds at our own expense.</p> <p>127. Land owners who have creeks/rivers running through their properties habitually take care of them - the water that they supply is their lifeline.</p> <p>128. Landowners in this region and other landowners and farmers within the LGA already undertake many of the activities suggested in the BMS as part and parcel of keeping their land healthy, and highly productive.</p> <p>129. The commercial agriculture sector strives to maintain healthy biodiversity on their farms as they see the long term benefits to the value of their assets and business. We would not see the benefit of a financial burden on our members for a special rate variation as dairy farmers would rather implement programs for their individual farms</p> <p>130. Farmers are already caretakers of the land that pay privately to provide the services that Council doesn't.</p>	<p>The draft BMS recognises the large amount of investment (time and money) that landholders already put into managing biodiversity on their land. This is of benefit to the whole community in terms of ecosystem services - providing healthy soils, water and landscapes.</p> <p>The draft BMS proposes to reward landholders managing and enhancing high conservation value areas on their properties and to encourage others to do the same through education and incentives.</p> <p>Rewards to landholders would be through providing rate rebates where high conservation value areas are being enhanced and managed. This would be based on eligibility criteria.</p> <p>The ABCD Framework is likely to form the basis of Council's education program as a self-assessment method for landholders.</p> <p>The BMS would also provide opportunities for landholder to get practical assistance to manage areas of high conservation value on their properties. This may be through the management of weeds to the development of property or site management plans.</p>	No amendment recommended
Flouride will defeat the purpose of a BMS	<p>131. There is no point supporting wildlife conservation through the BMS if council goes ahead with the plan to medicalise (with fluoride) its population without their prior agreement.</p>	Noted – Fluoridation of water in the Lismore LGA is not in the scope of the BMS and is not the responsibility of the Environmental Strategies team.	No amendment recommended
Rate pegging	<p>132. Rate pegging @ 2.5% yields more than an additional \$500,000 into the coffers. The above only states rate pegging would apply to the SRV, if approved. It does not</p>	If a Special Rate Variation for the BMS is approved and introduced, the amount levied to ratepayers each year beyond Year 1 can be	No amendment recommended

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>state the annual rate pegging increase generated by the SRV will be used for the BMS. Will the rate pegging annual increases be spent on the srvc or will it be directed to other expenditure?</p>	<p>increased by up to the rate peg percentage. An SRV for the environment (environment levy) is not a 'service' under the NSW Local Government Act meaning the SRV would be added to the general rates category, which means it would be subject to the standard rate pegging. The rate peg percentage is determined each year by the NSW Independent Pricing and Regulatory Tribunal (IPART). The rate peg increase is meant to reflect the average cost increase incurred by a council from one year to another. For 2014/15, the rate peg percentage was 2.3%.</p> <p>When the Special Rate Variation for the BMS is increased by the rate peg percentage, the budgeted expenditure supporting the program would be increased by the addition rate revenue levied.</p>	
	Community Consultation		
<p>Inadequate community consultation process</p>	<p>133. The telephone survey conducted by the Hunter Research Foundation calling a total of 200 representative ratepayers from a total of 17,128. This is less than 1.2% of the ratepayers that will be affected, which is hardly likely to give you substantial and realistic feedback.</p> <p>134. The targeted rate payers for the SRV is 17,100. The independent Hunter Research Foundation is to undertake a telephone survey of around 200 ratepayers in the three relevant rating categories. This is 1.16% of the targeted group - a very small minded approach - very unfair.</p> <p>135. It would seem logical that the only way Council can give veracity for the level of support for a BMS, is to provide a formal process to seek a response from each individual ratepayer as to whether there is support or not. Only those who have indicated they support the concept should be required to pay rate variation.</p>	<p>The Hunter Research Foundation were engaged by Council to undertake an independent study of the community's willingness and capacity to incur the proposed rate increase. Based on their expert advice, a sample size of 200 ratepayers with a minimum of 50 ratepayers per category was used. This sample size of 200 yields a sample variation of +/- 7.1 per cent at a confidence level of 95 per cent, given a response probability of 50 per cent.</p> <p>The Hunter Research Foundation have worked on similar Special Rate Variation studies for other Council's in NSW and has received commendation from IPART itself. Council is confident the HRF are experts in the field and provide sound advice, including that of it's</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
	<p>136. Council states that it will "randomly select around 200 ratepayers" to conduct short telephone interviews. This clearly breaches the standard set by IPART in relation to consultation. Reason from IPART: Where a council is seeking a large rate increase and decides to undertake a survey, it is important that the survey sample is representative of the relevant population, and is of sufficient size (approximately 400 respondents) to generate statistically reliable results.</p>	<p>methodology.</p> <p>Council engaged the HRF to undertake an independent survey of a randomly selected sample of 200 ratepayers. HRF have advised that this sample is of a sufficient in size to generate statistically reliable results. Although the margin of error of a survey decreases with increasing sample size, there is only 3% increase in confidence level between sample sizes of 200 and 400. Given the above and the relatively small 1.9% proposed rate increase, 200 was a sufficient sample size to provide Council will statistically robust results.</p>	<p>No amendment recommended</p>
	<p>137. The thought of a Community Forum with a "massive" 40 participants invited to lunch "randomly selected through and external automated process" - this being 0.23% of the total of targeted rate payers is very poor. This forum will provide Council time to indoctrinate and convince them.</p>	<p>This form of engagement and use of representative sampling has been used successfully by Council to develop the current CSP. This survey approach has received endorsement by the NSW State Government. The proven benefits of this survey method include:</p> <ul style="list-style-type: none"> ○ Participants can make independent informed recommendations to Council ○ It is not possible for particular interest groups to skew representation ○ The broadest possible cross section of opinion is accessed to assist Council's decision making. 	<p>No amendment recommended</p>
<p>Timing of consultation</p>	<p>138. Why choose the week or two before Christmas to ask the community what they think when people have other things to attend to?</p> <p>139. The timing of the distribution of this letter was very poor. It was sent out just before Christmas when many people were caught up with family Christmas preparations and holiday plans.</p>	<p>Council recognises the consultation period for the Draft BMS extended over the Christmas period. However Council took this into account by providing the community with 3 months to review the document and provide submissions. This provided sufficient time (well above the 28 days) outside of the Christmas holidays to review and provide comment on the draft BMS.</p> <p>Testament to Council's extensive consultation,</p>	<p>No amendment recommended</p>

Issue	Quotes from submissions	Response	Recommended changes to the BMS
		Council received around 1500 submission it revised regarding the draft BMS and proposed SRV.	