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Sent: Wednesday, 13 March 2019 1:13 PM
To: Local Government Mailbox <localgovernment@ipart.nsw.gov.au>
Subject: Dungog Council - Special Rate Variation Submission against the SRV

he special rate variation application (SRV) is flawed and misrepresents both the affordability for farmers who are significant employers in the region and the support for the SRV. In this regard the proposed SRV is unfair to farmland ratepayers. Note that:

1. Only 60% of residents aware of the SRV - page 54. The Micromex SRV phone survey states that 53% of surveyed respondents support the SRV and Improvement Plan with 47% against. The survey data does NOT indicate what % of all phone respondents were farmland ratepayers and the potential bias. e.g. were the other 40% largely farmers?

2. Resident Question 6 page 61 - Council response acknowledges rates are tied to land values and could lead to total revenue increases more than the 98% based on today's land values if they are increased by the Valuer General - could affect all rate payers - in particular farmers who will experience massive increases>>98%

3. Issue 6 page 63 - farmers cannot afford rate rise - the council response does NOT address the matter at all
- The farming sector has an average income of \$25,696 - page 3 of Morrison Low Report. But Council ignored affordability concerns though it yields 37% of current total rates.
- Similarly private health cover as an indicator of affordability is potentially flawed as this this may be limited e.g. to ambulance cover. How many farmland rate payers have ANY private cover on an average income of \$25,696? Very few in all likelihood – impact of current cattle price collapse and effect on farm income not modelled.

4. An operating surplus is achieved (page 37) by 2023 - why extend the SRV over 7 years to 2028? The SRV to be capped/pegged to 2022 with a corresponding % reduction. The Delivery Program extends to only 2022. A proportionate quantum decrease condition is required:
- should the Valuer General subsequently increase land values and or
- should the State take back responsibility for the major arterial roads post the March 2019 State election.