Dr. Peter Boxall
Chairman
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop NSW 1240
(Email submission to: localgovernment@ipart.msw.gov.au)

Dear Dr. Boxall,

Independent Pricing and Regulatory Tribunal- Fit for the Future Reform Objection to Submission of Bankstown Council

We are writing in response to the Council Improvement Proposal by Bankstown Council in relation to the Independent Pricing and Regulatory Tribunal's ('IPART') Fit for the Future Reform.

We would like to begin by noting that IPART has put forward two suggestions for Bankstown Council to ensure the council is 'Fit for the Future':

- 1. No change: or
- 2. Combine as strong joint organisation with Liverpool, Fairfield, Camden, Campbelltown, and Wollondilly.

IPART did not propose that Bankstown Council combine with Strathfield Council. In fact the preferred suggestion from IPART for Bankstown Council was **No change**¹.

Proposed Realignment of the Bankstown/Strathfield Boundary

As part of their Fit for the Future submission, Bankstown Council has proposed to realign the boundary between Strathfield Council and Bankstown Council to include a substantial part of Strathfield Council. The amendment to the border will impact 3,337 residents ('Residents of Amendment Boundary Area').

Bankstown Council has sited the following as justification for this proposal:

- Adjustment would increase the ability for effective regional planning through observance of natural boundaries;
- More effective asset management;
- Residents of the Amendment Boundary Area have similar needs to residents of Bankstown Council.

We note that they have not provided any explanation on how the boundary amendment will improve or assist in asset management nor how the amendment observes natural boundaries. They have provided no indication or explanation on how the needs of the Residents of the Amendment Boundary Area are similar to those of Bankstown Council. They have not demonstrated how they have investigated these suggestions or what research they conducted which led them to these conclusions. We have not received any correspondence from Bankstown Council- no mail-outs, facts sheets, surveys or public meetings (all methods that IPART suggested to obtain feedback as part of Councils consultation process) to provide us with any information or to understand our needs. We have only been provided information from Strathfield Council to alert us to their proposal.

¹Independent Pricing and Regulatory Tribunal- Review of Criteria for fit for the future- Final Report September 2014. Annexure C, Table 3.1, Pg. 53

IPART Fit for Purpose Criteria

IPART has identified various factors which they will consider when assessing Council's proposals. As part of their proposals, Councils should be identifying:

- The demographics of an area;
- The community's social and economic needs; and
- The community's sense of local identity.

ILGRP has also noted that a policy on boundary change should be evidence based assessments and should include full community consultation. Bankstown Council have not attempted to thoroughly address any of the above requirements or conducted any community consultation.

Bankstown Council has failed to consider the adverse effects the boundary change will have on us as Residents of the Amendment Boundary Area. These effects have been addressed below.

Level of Services

Bankstown Council has proposed to move the boundary to include 3,337 residents across a number of residential blocks. In their submission, Bankstown Council includes very limited reasoning and little explanation as to how they believe this will assist in ensuring their council is 'Fit for the Future' except that it will increase their rateable income by approximately \$2,500,000 and will assist in reducing the need for a 1.5% uplift to <u>current</u> ratepayers. Neither does this approach to raise revenue make any financial and economic sense, nor does it add any value to the community as a whole.

While they describe the relative population intake as 'low' we do not believe that 3,337 is insignificant. They have failed to identify how they will provide services for the 3,337 new residents — although they seem quite happy to take our council rates. How will they provide additional services for the 3,337 new residents if our council rates will be used to prop up current short falls? How will they apportion the council rates to ensure that the level of services that we are provided does not decrease? An increase in residents means an increase in the services required — how will they manage this? We are not confident that Bankstown Council will effectively manage the change — including both the finances and level of services—given their current financial situation. Strathfield Council has effectively managed and provided effective services to us as residents and we are not satisfied that Bankstown Council will adequately maintain these.

Recently there have been suggestions in the media from Bankstown Council that the Residents of the Amendment Boundary Area are currently using services provided by Bankstown Council. These services include schools and shops. We note that schools are provided by the State Government and shops are privately owned. The various other services provided by Bankstown Council such as park and libraries are open to the general public and are not exclusive to Bankstown residents. We would therefore be interested in understanding which services they are referring to and how these are measured. As far as we are aware the current services that we as residents are using such as footpaths, waste management, sewerage, drainage etc. are all provided to us by Strathfield Council. These suggestions and statements by Bankstown Council are unsupported and ridiculous and a poor attempt at justifying their proposal.

Land Value

The value of the property of those that fall under Bankstown Council are significantly less than those under Strathfield Council. Residents of the Amendment Boundary Area purchased their property as part of Strathfield and paid the market value (which was generally quite high) at the time to do so. To amend the boundary to include the Residents of the Amendment Boundary Area to Bankstown Council will decrease the value of their property and be disproportionate to the value that they originally paid i.e. they paid a significantly higher market rate than the surrounding suburbs. This would be extremely unfair to residents who paid premium for their property and who would not receive any other benefits from this boundary change.

Such kind of restructure should not be done at the expense of residents and no one should be worse as a result.

Community Ties

Residents of the Community- particularly those Residents of the Amendment Boundary Area have strong ties to the Strathfield Community. We have invested in the local community and enjoy additional resources provided by Strathfield Council. These resources include the Strathfield Library, local parks particular the Cooks River Reserve, Youth Services, childcare at the library, after school and holiday activities and council initiatives such Strathfield Fair. We have invested time, energy and money (council rates) working directly with members of the local council to ensure that the services they provide and efficient and meet the needs of the residents. ILGRP has identified that Local government boundaries should not unnecessarily divide areas with strong economic growth and social-inter relationships. Amending the boundary would be contrary to this.

As Residents of the Amendment Boundary Area we have chosen to live in Strathfield as we value the services provided to us by Strathfield Council. We value the high reputation of the suburb and the local community and do not identify as members of the Bankstown Community. We do not believe that Bankstown Council will provide better or even the same level of services as we are currently receiving from Strathfield Council. We do not want to be part of Bankstown Council.

Increased Cost for Residents

As Residents of the Amendment Boundary Area one of the most significant concerns with the amendment to the boundary would be the increased cost of living we would be faced with. There is currently a significant different in the Council Rates and land values between Strathfield and Bankstown. Should we be considered part of Bankstown Council we will be forced to pay higher council rates- our understanding is that this may be over \$500 per year in some streets. This is significant. Not only will we be forced to pay increased council rates but in turn the level of services we will receive will decrease. This does not include other cost increases we would face if we were considered part of Bankstown Council- for example the cost of insurance.

Assessing the Impact on the Local Community

In their submission, Bankstown Council has claimed that the residents of the Proposed Boundary amendment are of a similar cultural demographic and have similar needs to residents of Bankstown Council. We believe that this statement was made with little to no research conducted. Bankstown Council did not consult us as the Residents of the Proposed Boundary Amendment Area to understand what our needs are. They did not approach Strathfield Council to understand the level of services that we are currently receiving and whether these services are similar to what they are providing to their residents. It is very clear that appropriate investigation in the impact it will have on us as residents has not been undertaken. They have conveniently ignored the stakeholder who would be disadvantaged as a result of this change.

As previously discussed, Bankstown Council has proposed to amend the boundary claims as a means of increasing their rateable income to cover a short fall in their budget.

- They have not provided any explanation on how they will provide additional services for the new residents.
- They have not demonstrated how they would apportion any increases in their income from council rates to provide services to the new residents. They have only noted that this increase in income will assist their current budget for services provided to current residents.
- They have conveniently ignored us as the stakeholders who would be disadvantaged as a result of this change.

We as the Residents of the Proposed Boundary Amendment Area do not support the proposal by Bankstown Council to amend the boundary. We are not satisfied that that Bankstown Council has done any due diligence on this proposal or considered the effects on us as local residents.

Should you have any queries or would like to discuss any of the following please do not hesitate to contact Lidia De Lutiis at

We look forward to hearing from you.

Yours faithfully,

Residents of the Amendment Boundary Area

List of signatories voting against the Bankstown Council proposal

Attachment

Residents' Signatures

AGAINST Bankstown Council's

Bankstown/Strathfield

Boundary Realignment

Proposal

- A total of 260 signatures

	Signatories of Residents Voting				
	Name	Address	Signature		
	1				
	2				
	3.				
	4				
	5				
	7				
(/>					
(b) (4)	, 9				
(4)	10				
	<u> </u>				
	12 13				
	14				
	15				
	16				
	17				
4/4	4- 1				
12/1	2				
	2				
	_2				
				•	
25.					
•					
•					
	-				
	45				
				E-14	
		*		5-14	

£-1.4

٠