

Author name: C. Jaques

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Your submission for this review:

Based on the information provided, I support KYOGLEs SRV request of 2.5%. It apparently reflects the earlier advice provided by IPART, which is included in their IP&R documents and their shock at the significant reduction IPART is now implementing. This change in allowed rate increase, due to the new IPART methodology which has an apparent focus of population growth appears to be the basis of their submission for a SRV. Due to the IPART change in methodology (with a focus on population growth) those councils without population growth ( see comparative information on NSW councils, which includes population by year and average ages etc - which IPART would have had access to to see the reality of the methodology change) are being damaged financially (with a cumulative effect over the longer term). Councils are also forced into preparing submissions, diverting resources from council real business, to seek IPART approval to increase rates beyond the IPART determined 0.7% increase. Doesnt seem to be efficient and effective government procedures to me. Im not a Kyogle Council ratepayer. Im a TSC ratepayer. I support Kyogle Councils very reasonable request. Ultimately what they are seeking, would have been provided, if IPART hadnt changed the methodology, \$ disadvantaging this council. As a TSC ratepayer Im very concerned about the recent staff report suggesting unreasonable permanent general rate increase, which fortunately the new TSC council didnt accept & resolved for no SRV for 22/23. See stats on TSC population age & \$ income. However, the principle of my feedback on Kyogle council also applies to other small regional and rural councils without population growth. IPART need to change back ASAP. Hopefully I automatically get an emailed copy of this, full submission? I note in the have your say link it says after you lodge your submission, youll receive a confirmation email. But confirmation isnt the same as a copy of the submission.

Your comments on Criterion 1:

It seems to me (as a ratepayer of Tenterfield Shire Council, an adjoining local government area to Kyogle) that the latest IPART procedure change , which is focussed on Population growth, has had a significant negative impact on the non metropolitan councils which do not have population growth. The Kyogle application reflects information apparently previously provided by IPART following which Kyogle were expecting 2.7% to be available for 22/23. .7% seems ridiculously low & impractical. The theory of a different revenue path is not practical as far as I can see and could be seen to be a mechanism to punish the smaller regional councils, without population growth. Allowing them to submit a SRV series of documents seems to do nothing except divert councils from their direct role and create more unnecessary shelf ware, especially for the SRV Kyogle is seeking (i.e. what it would have been except for IPART methodology change?) It seems to be creating busy work for both councils and IPART for no real benefit to the community. I.e. waste of more \$/time?

Your comments on Criterion 2:

From the documents, Kyogle was timely and clear in the information provided to the community. I find it interesting that this criterion apparently only considers community awareness, not level of active support for? No response, should not be taken for active support for SRV or minimum rate increases or changes.

Your comments on Criterion 3:

Any unreasonable impact on Kyogle ratepayers would appear to arise from the IPART methodology change. Was the community consultation sufficient by IPART. Were the councils advised of the consequences of the new population based methodology? I dont think the smaller (activity level not physical area) rural and regional councils can afford for IPART to take the next 5 years to review the new (population) based methodology. I suggest IPART (or whatever minister or premier) needs to immediately revert the methodology back to the pre population growth version. This needs to happen before the end of April 2022, so budgets can reflect a more reasonable rate increase (at least the 2.5% as proposed by Kyogle Council, based on earlier IPART advice, apparently).

Your comments on Criterion 4:

Ultimately exhibited, approved and adopted by council, doesnt reflect the community views. Also, I dont see how the timing of the IP&R process can be aligned with the changing IPART methodology.

Your comments on Criterion 5:

If this whole process is essential, then this is necessary. For Kyogle, it appears their SRV request relates to a very damaging change of IPART methodology. Their IP&R documents now have a significant negative effect due solely to IPART decisions changing re rate increase methodology. It appears obvious from online, public comparison reports of all NSW councils, that many councils do not experience population growth, so automatically put on 0.7% rate increase. I dont understand the purpose of this financially damaging IPART population based determination.