

13 August 2021

Ms Deborah Cope
Acting Chair
IPART Review of the Rate Peg to Include Population Growth
Level 16, 2-24 Rawson Place
SYDNEY NSW 2000

Via: ipart@ipart.nsw.gov.au

RE: IPART Review of the Rate Peg to Include Population Growth

Dear Ms Cope,

Regional Cities New South Wales (RCNSW) is pleased to present the attached submission for consideration in the IPART Review of the rate peg to include population growth.

We welcome the opportunity to participate in this review and have the views of our members considered as part of your investigation.

Should you require any further information please do not hesitate to contact our Secretariat, Rachael Sweeney on [REDACTED] (*New South Wales Lobby Register No: 18169904232*).

About Regional Cities New South Wales

RCNSW is a newly formed alliance comprised of 15 member councils dedicated to growing regional cities in New South Wales.

Our members are:

- | | |
|-----------------------------------|-----------------------------|
| - Tamworth Regional Council | - Bathurst Regional Council |
| - Albury City Council | - Wagga Wagga City Council |
| - Queanbeyan-Palerang Council | - Orange City Council |
| - Port Macquarie-Hastings Council | - Armidale Regional Council |
| - Coffs Harbour City Council | - Dubbo Regional Council |
| - Griffith City Council | - Lismore City Council, and |
| - Goulburn Mulwaree Council | - Tweed Shire Council. |
| - Maitland City Council | |

Regional cities are fundamental to the success of New South Wales, in light of the bushfires and COVID-19, there has never been a more important time to plan for the future success of our regions.

Yours sincerely,

[REDACTED]

Cr Tim Overall
Chair, Regional Cities New South Wales
Mayor, Queanbeyan-Palerang Regional Council



REGIONAL CITIES NSW

Regional Cities New South Wales

Review of the Rate Peg to Include Population Growth

Submission



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Regional Cities New South Wales (RCNSW) welcomes the opportunity to make a submission to the NSW Independent Pricing and Regulatory Tribunal's Draft Report of its Review of the rate peg to include population. We have attached a datasheet compiled from regional cities to support our views.

IPART has asked for written feedback on the following three questions:

1. Should our methodology be re-based after the census every five years to reflect actual growth?
 - a. Yes, only to adjust population peg upwards for the respective LGA
2. In the absence of a true-up, should we impose a materiality threshold to trigger whether an adjustment is needed on a case-by-case basis to reflect actual growth?
 - a. There should be no reduction to previous year/s population peg, should the census true-up be less than the ERP previous forecast
3. Do you have any other comments on our draft methodology or other aspects of this draft report?
 - a. See below submission

Introduction

RCNSW is an alliance of 15 regional cities from across the state. The alliance aims to grow regional cities in New South Wales (NSW) through increased investment that will build productive, liveable and connected regions.

RCNSW concurs that councils are not adequately compensated for population growth under the current rating system.

The greatest challenge of a growing population for councils is the expanding gap between costs of providing infrastructure and services to their communities, and the revenue obtained from their two main revenue sources: rates and developer contributions. This gap disincentivises councils from accepting development and encouraging population growth.

RCNSW welcomes the initiative to use population growth as a factor to increase council rate revenue and the guarantee that no council will be worse off under these reforms.

RCNSW agrees that a methodology that will enable councils to maintain per capita general income over time as their populations grow is part of the solution; however, it is not the whole solution. Indeed, IPART may also contemplate a new rating model to differentiate net infrastructure expenditure towards ad valorem rates, and net service expenditure towards base rates.

The IPART review presents an opportunity to recast the framework of local government rates and revenues for the future sustainable provision of infrastructure, facilities and services.

Issues

There is no 'one size fits all' approach. The service provision and infrastructure needs of each regional city and rural council are different, to each other and to metropolitan councils.

The area covered by regional LGAs and the dispersed nature of their population often demand the duplication of services and facilities and the provision of greater amounts of infrastructure when compared to metropolitan councils. Generally, regional councils provide their communities a more diverse range of services that are not the obligation of metropolitan councils.

The rate peg on council rates has limited the capacity to raise the revenue needed, and has placed our member councils under strain to provide the required and expected services and infrastructure – in the past, at present, and in the future.

The nature of regional LGAs means that their rate base is smaller and less capable of generating the revenue needed compared with their metropolitan counterparts.

Compared to councils in other states, NSW Councils are falling behind in their capacity to deliver infrastructure and services. As Local Government NSW observed, “The NSW Productivity Commission also confirmed that NSW has the lowest per capita rates as the result of rate pegging and estimated that NSW rates are around 30 percent below the national average with NSW councils having foregone \$15 billion over the past 20 years when compared to Victorian councils.”¹

The implications of this are dire. As IPART itself observes, “We expect under-recovery of the costs of growth will mean growing councils will be unable to maintain their service levels.”² This is exacerbated by councils’ inability to meet Office of Local Government asset ratios benchmarks. This leads to a downward spiral due to councils’ inability to borrow and therefore inability to maintain, repair and replace their assets.

State and Federal Government nation building initiatives like Snowy 2.0 and the building and improvement of highways and activation precincts bring economic benefit to Australia and the regions, and bring these workforces to regional cities, often as FIFO or DIDO workers.

However, these workforces also impose pressure on regional cities to provide and maintain infrastructure, facilities and services to cater for this expanded, but ultimately transient population. At the same time, regional cities are without the capacity to recover these establishment, maintenance or servicing costs as effectively through user pays approaches, as their metropolitan counterparts. As IPART observed in the draft report: “ultimately ratepayers across all rating categories, including residential ratepayers, would pay for the additional costs to councils.”³

The same may be said about the development of renewable and other energy installations in regional NSW. At present, regional councils have no mechanism to capture this change of land use accurately in their ratings categories.

In addition, as LGNSW has noted in its Draft submission to the Parliamentary Inquiry into the Environmental Planning and Assessment Amendment (Infrastructure Contributions) Bill 2021:

Councils are concerned that their communities are being overlooked for important supporting infrastructure because the approval bodies for these developments do not always require payment of

¹ LGNSW, Draft Submission to the Parliamentary Inquiry into the Environmental Planning and Assessment Amendment (Infrastructure Contributions) Bill (July 2021) (hereafter LGNSW, Infrastructure Contributions Bill), 5

² IPART, *Review of the rate peg to include population growth. Draft Report*. June 2021., p11

³ Ibid., 3

contributions for local infrastructure as a condition of approval for SSD (State Significant Development). LGNSW is not aware of any mandatory framework to formalise the requirement for such contributions or to extend such contributions to benefit neighbouring councils that may be also directly affected because of the cumulative impacts of many developments in adjoining LGAs.⁴

The same issue pertains to the influx of tourists into the region, who again expect, with justification, a level of facilities and infrastructure whose costs are borne overwhelmingly by local ratepayers. The Airbnb phenomenon has meant that buildings rated as residential have become de facto business locations, imposing additional demands on infrastructure and services, without making appropriate contributions through their rates to defray these additional costs.

None of these issues have “just appeared”, but their cumulative effect has meant that regional councils have fallen behind in the building and maintenance of key assets.

Another of RCNSW’s concerns is that IPART’s proposed population growth approach appears to not take into account the ongoing maintenance, repair and renewal or depreciation of new and existing assets; and, does not provide any mechanisms to give councils the capacity to do this important work without sacrificing other works or services.

RCNSW estimate that for each 1000 increase in population, it requires an additional 7.5 FTE to continue to provide current services that range from libraries and childcare, to swimming pools. The current rating structure often means that these staff cannot be hired because neither the funding, nor the mechanisms to generate the funding are available.

Thus, the effects of the rate peg, population growth and the infrastructure demand by a region’s service population have left a backlog of infrastructure and facilities projects and a legacy of condition 4 and 5 assets, which show evidence of extensive wear and tear or have finally been rendered unserviceable. The backlog was estimated to be \$38 billion in 2018-19.⁵

IPART modelled the impact its draft new methodology on councils’ general revenue over the past 4 years. It reports that it would have increased the total general income of the sector by 0.6%, or \$116 million.⁶

When the uplift in income from this reform is considered in light of the infrastructure and facilities backlog, it is clear that this reform is completely inadequate and more needs to be done.

RCNSW’s Proposed Framework For Rate Peg Reform

- Consider the impacts of multiple reforms in this area before implementation. The current rate peg reforms and proposed reforms to infrastructure contributions each influence the other. Given this, it is critical that the reforms are carefully analysed to fully understand the financial implication each reform has on the other before either of the reforms is finalised.
- The preferred approach is to implement a methodology that:

⁴ LGNSW, Infrastructure Contributions Bill), 10

⁵ LGNSW, Infrastructure Contributions Bill, 5

⁶ IPART, *Review of the rate peg to include population growth*, 4.

- Maintains total per capita general income over time;
 - Reflects the linear relationship between population growth and council costs, differentiated by LGA cohort (metro, coastal, regional city, regional, rural, merged);
 - Is based on the change in residential population for each council;
 - Is not discounted by growth in supplementary levies; and
 - Applies to all councils, including those experiencing growth.
- The ABS estimated residential population (ERP) data is an acceptable source of measuring change in population.
 - In the future, IPART's methodology should be re-based after the census every five years to reflect actual growth, provided the true-up does not negatively impact the population rate peg granted from previous year ERP.
 - The current proposed adjustment to the rate peg for population growth should include an adjustment for past growth, as a catch up over say, 5 years.
 - The proposed adjustment to the rate peg for population growth should address the cost of both the capital component, as well as the recurrent and operating component, of that growth. That growth is reflected in growth in new or upgraded asset depreciation.
 - Any reform of developer contributions should take account of the ongoing operating and maintenance costs of the development.
 - Remove IPART's proposal to discount the value of supplementary levies when assessing the increase in the rate peg for population. The removal of this component of the proposed reform would allow for some level of recognition of, and support for, the infrastructure and service demands created by transient and tourist populations and the greater areas covered by regional LGAs and the dispersed nature of their populations.
 - Review the categories of the rating structure to ensure the capacity to capture the transformation of land use, such as the building of a renewable energy installation on farmland or the metamorphosis of a residential dwelling into an Airbnb.

Components Of A Reform Package

Consider the impacts of multiple reforms in this area before implementation.

The current rate peg reforms and proposed reforms to infrastructure contributions each influence the other. Given this, it is critical that the reforms are carefully analysed to fully understand the financial implication each reform has on the other before either of the reforms is finalised.

RCNSW is concerned that the NSW Government has taken a piecemeal approach to the funding of development.

The proposed Environmental Planning and Assessment Amendment (Infrastructure Contributions) Bill 2021 deals with one aspect of this issue. The final shape of this reform has financial implications for local councils

with respect to the review of the rate peg and population growth. This also includes the proposed exclusion of community facilities from the essential works list, requiring current and future ratepayers to forward-fund the capital and subsequent maintenance of those facilities – the scale and siting of which responds to the rate and cohorts of population growth. Further, the IPART review may contemplate assigning contributions to new and renewed capital (through debt and depreciation), rather than await the aggregation of sufficient funds to undertake projects identified in the works list – by which time escalated costs have outstripped contribution indexation. While each issue should be treated independently, it is our view that before either reform is finalised, analysis must be done to understand fully the financial implications of one reform on the other.

In the future, IPART's methodology should be re-based after the census every five years to reflect actual growth.

The consideration of the implications of population growth is timely and accurate estimation of population growth is critical for regional councils.

The impact of Covid-19, the suspension of international migration to Australia, and the technological developments to enable more working from home, have challenged population growth forecasts across every state and region.

Capital city residents are moving to regional cities to escape urban congestion and the escalating cost of housing. Young people and professionals are choosing to remain in the regions rather than move to the capital cities. These trends are being accelerated by the opportunity and the capacity to work from home and access services thanks to bandwidth and other technological advances in the Covid context.

In addition, councils need to consider the impact of Covid on the demographic profiles of regional cities, taking account of the age of the new residents, while also addressing the issue of an ageing population.

In light of these developments, RCNSW believes that IPART's methodology should be re-based after the census every five years to reflect actual growth, provided it does not negatively impact previous year peg adjustments.

This is especially important because of the budgetary implications of population growth, which currently is diminishing local councils' capacity to fund the infrastructure and services this growth requires. IPART has noted that council costs have historically increased with population growth, with council expenditure increasing 0.85% for every 1 percent increase in population, while councils' general income increases by only approximately one-quarter of a percentage point.⁷ It might be useful for IPART to reassess council expenditure inclusive of depreciation to ascertain whether this 0.85 per cent coefficient is consistent across LGA cohorts (metro, coastal, regional city, regional, rural, merged) Check: from RCNSW evidence

With reference to the data sheet, the following conclusions may be drawn for our member regional city LGAs:

- the average annual population growth exceeds 1%
- general rates growth, inclusive of rate peg (ave 2.4%) and supplementaries is 3.5%
- the value of that supplementary levy growth falls well short of increased annualised net cost of general services
- the relative reduction in pension rebates signals much of the growth in regional cities is a younger cohort, in turn driving infrastructure and service costs to support that cohort

⁷ IPART, *Review of the rate peg to include population growth*, 9 and IPART, *Information Paper No 1*, 21.

- the notion a 1% increase in population drives a 0.85% increase in expenditure, is not valid for regional cities LGAs
- the proposition to deduct the value of supplementary levies from the population rate peg, widens the gap in that population: expenditure coefficient
- the average annual per capita growth in income, also falls short of the equivalent growth in expenditure, indicating per capita income cannot be maintained over time
- the growth in infrastructure depreciation itself, engulfs much of the value of supplementary levies

The current proposed adjustment to the rate peg for population growth should include an adjustment for past growth.

RCNSW believes that the proposed adjustment to the rate peg for population growth should include an adjustment for past growth.

RCNSW believes that this should be determined on a case-by-case basis to consider each council's financial sustainability, its past income from supplementary valuations, its productivity and operating environment, and the impact of any special variations, or determined by cohorts. Up to a five year catch up should be considered, without an SRV.

RCNSW acknowledges that this is contrary to IPART's proposal. However, in our view, it is a necessary step to support the financial sustainability of councils and to assist in the task of removing the infrastructure backlogs and implementing an effective maintenance, repair and renewal (MRR) program to remediate condition 4 and 5 assets. It will give councils the capacity to meet and maintain the infrastructure and service provision challenges of growing populations.

In this way, SRVs should be focussed on council proposals to expand, renew or upgrade infrastructure or services, not just for the purpose of financial sustainability.

The proposed adjustment to the rate peg for population growth should address the cost of both the capital component, as well as the recurrent and operating component, of that growth.

IPART's review of population growth and the rate peg is a tacit acknowledgement of, and an attempt to rectify, the growing disparity between local councils' provision of services and infrastructure and their capacity to fund these obligations through the current rates structure. A consideration of the causes of this widening gap between demand and revenue requires a broader approach to reform to ensure the sustainability of local councils' service and infrastructure delivery.

The real issue here is the financial sustainability of councils in the face of growing populations and the capital and recurrent cost increases that this brings.

IPART has looked at population growth as a driver of infrastructure growth. However, it has not acknowledged the fact that population growth drives growth in service cost in the same way that property change and drives growth in infrastructure maintenance, repair and renewal (MRR) costs.

IPART's solution is designed to address the capital component of the cost of population growth, but does not address the recurrent and operating component of that growth. Infrastructure and facilities need to be

maintained, and they must be manned and operated. The lights must come on, and these costs are being left to rate payers.

Any reform of developer contributions should take account of the ongoing operating and maintenance costs of the development.

Other revenue mechanisms like developer contributions are welcome, but these have their limitations, especially with regard to ongoing operating and maintenance costs. As IPART has noted:

Developer contributions ... provide for base-level infrastructure to support development and to meet the infrastructure needs of the growing population. However, they do not provide for the operating and maintenance costs of this infrastructure or increases in the volume of services demanded by the additional population.⁸

It is suggested contribution plans be revised to bias s7.11 plans to assist funding new or upgraded infrastructure, while s7.12 plans raise charges to assist funding renewal of infrastructure or servicing debt for infrastructure.

Remove IPART's proposal to discount the value of SRVs when assessing the increase in the rate peg for population.

The removal of this component of the proposed reform would allow for some recognition of, and support for, the infrastructure and service demands created by transient and tourist populations and the greater areas covered by regional LGAs and the dispersed nature of their populations.

Supplementary valuations do not account for some types of growth, and the supplementary valuation related increase in council revenue does not keep pace with the increase in growth-related costs⁹.

Review the categories of the rating structure to ensure the capacity to capture the transformation of land use, such as the building of a renewable energy installation on farmland or the metamorphosis of a residential dwelling into an Airbnb.

The approach needs to address the lack of flexibility in rating structures to capture the transformation of land use, like the building of a renewable energy installation on farmland or the metamorphosis of a residential dwelling into an Airbnb as a tourism operation in line with the STRA ambitions of government. These are fundamentally business uses on farming or residential category properties, attracting a different load on infrastructure and demand on services than contemplated in the rates category.

Accordingly, new rate category (or business subcategories) should be considered for those type of uses, with the rate revenues so calculated in addition to the general notional income.

Review the Data Sources

⁸ IPART, Information Paper No. 1, 23

⁹ Ibid, 22

In addition, there needs to be an accurate assessment of councils' service and infrastructure expenditure to illustrate expenditure growth compared to population and asset growth. An audit of schedule 1 (net cost of services) and schedule 7 (Asset MRR and depreciation costs) should improve our knowledge and increase confidence. Our datasheet has utilised those sources.

IPART may wish to improve the veracity of the schedules by suggesting they be audited; or utilise the average unit costs of services tabulated annually by the Local Government Grants Commission as a benchmark.

Review The Application Of The Emergency Services Levy

There should be consideration of legacy issues such as the Fire and Emergency Service Levy, which supports assets and services that are no longer the sole province of local councils and volunteer fire brigades. Indeed, the levy currently charged by Government to our local councils should instead be recovered by an annual tax issued by Revenue NSW based on LGA cohorts (metro, coastal, regional, rural) that differentiates the demand on those emergency services, and by the category of rate (residential, business, farmland and mining). That initiative could be aligned with the current property (stamp duty) tax reforms.

Conclusion

Finally, RCNSW believes that this more comprehensive framework will help resolve the problem of population growth, especially for regional cities. It presents an opportunity to build a foundation for more fiscally sustainable local councils that can deliver the infrastructure and services needed by their residents. We look forward to working with government to achieve this goal.

For More Information:

Rachael Sweeney – RCNSW Secretariat
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Appendix A: RCNSW Rate Peg Data

RCNSW												
	Albury (C)	Coffs Harbour (C)	Dubbo Regional (A)	Goulburn Mulwaree (A)	Maitland (C)	Lismore	Orange (C)	Port Macquarie Hastings (A)	Queanbeyan-Palerang (A)	Tamworth Regional (A)	Tweed (A)	RCNSW population
Dataset: ERP by LGA (ASGS 2020) 2001 to 2020												
Census												
2015	51486	73739	50847	29815	77374	44212	40837	78997	57130	60432	92261	818515
2020	55055	77648	54044	31554	87395	43667	42503	85952	62239	62545	98382	867609
Population Impact												
growth (2015-20)	6 9%	5 3%	6 3%	5 8%	13 0%	-1 2%	4 1%	8 8%	8 9%	3 5%	6 6%	6 0%
annual ave growth %	1 2%	0 9%	1 0%	1 0%	2 2%	-0 2%	0 7%	1 5%	1 5%	0 6%	1 1%	1 0%
Rates Impact												
ordinary rates (\$ 000) 2016	36121	44515	31567	17735	46102	27642	27614	45416	31449	31406	54469	394036
ordinary rates (\$ 000) 2020	42135	47148	35843	20587	66567	31037	32760	52154	37608	35811	62143	463793
residential rates (\$ 000) 2016	25870	34192	17780	11149	32871	17731	19720	35461	23669	20664	46609	285716
residential rates (\$ 000) 2020	30600	38171	20748	13607	50401	20084	23991	41411	28872	24526	53740	346151
ordinary rates annual ave growth %	3 3%	1 2%	2 7%	3 2%	8 9%	2 5%	3 7%	3 0%	3 9%	2 8%	2 8%	3 5%
total assessments 2016	23236	31606	22001	14942	31605	18378	18472	34730	24 981	26 789	39 644	286384
total assessments 2020	24762	33130	23217	15976	35082	18694	19622	37318	27 011	28 183	41 012	304007
Property Impact												
supp growth (residential) 2016-20	1 379	1732	1241	811	3386	325	1087	2595	1908	2862	1123	18449
supp growth (\$ 000) 2016-20	3 635	4024	1348	1249	6207	474	1648	2982	3170	3938	3430	32105
annual ave growth % GPR 2016	2 0%	1 8%	0 9%	1 4%	2 7%	0 3%	1 2%	1 3%	2 0%	2 5%	1 3%	1 6%
Rate Peg												
peg growth (\$ 000) 2016-20	5059	3749	2915	1603	5754	2420	3406	5140	3844	4347	6307	44544
peg ave annual growth %	2 8%	1 7%	1 8%	1 8%	2 5%	1 8%	2 5%	2 3%	2 4%	2 8%	2 3%	2 3%
Service Impact (\$,000)												
expenses continuing operations (excl utilities) 2016	75914	108459	58775	43674	74527	74732	64727	86071	68485	83905	110042	849311
expenses continuing operations (excl utilities) 2020	95092	145247	102823	47941	90763	96126	72963	102556	99328	89028	125739	1067606
annual ave growth %	5%	7%	15%	2%	4%	6%	3%	4%	9%	1%	3%	5%
Nett service cost (\$ 000) opex less non-cap income												
nett service cost (\$ 000) excl utilities 2016	-3540	-3776	6837	23856	10388	-2193	16702	55959	42992	47104	36150	230479
nett service cost (\$ 000) excl utilities 2020	8513	20434	-8333	21926	21472	574	15567	75582	66928	55465	44043	322171
annual ave growth %	-68%	-128%	-44%	-2%	21%	-25%	-1%	7%	11%	4%	4%	8%
Asset Impact												
depreciation growth (excl utilities) (\$ 000) 2016-20	6427	6203	20897	826	4900	-454	1174	9797	6999	4698	3682	65149
depreciation ave growth %	9 6%	9 8%		1 31%	6 5%	-0 25%	2 3%	8 1%	11 1%	23 4%	10 8%	83%
supp levy/depreciation growth % 2016-20	56 6%	64 9%	6 5%	151 2%	126 7%	-104 4%	140 4%	30 4%	45 3%	83 8%	93 2%	49 3%
Development Contribution												
DC % expend new capex 2016		55%	61 83%	13 00%	21 3%	3 53%	8 0%	8 54%	17 0%	3 2%	14 4%	21%
DC % expend new capex 2020		51%	196 16%	15 70%	20 0%	8 81%	28 2%	19 41%	53 6%	2 3%	12 6%	41%
Pension Rebate												
annual ave growth %	0 35%		2 62%	-0 17%	0 94%	-3 1%	-0 05	-0 05%	-1 7%	-3 4%	-9 2%	
Per Capita												
ordinary rates \$ per capita 2016	702	604	621	595	596	625	676	575	550	520	590	6654
ordinary rates \$ per capita 2020	765	607	663	652	762	711	771	607	604	573	632	7347
annual ave growth %	1 8%	0 1%	1 4%	1 9%	5 6%	2 7%	2 8%	1 1%	2 0%	2 0%	1 4%	2 1%
ave supp rate \$ per new capita	1 018	1 029	422	718	619	870	989	429	620	1 864	560	7400
per capita service cost \$ 2016	1474	1471	1156	1465	963	1690	1585	1090	1199	1388 4	1192 7	14674
per capita service cost \$ 2020	1727	1871	1903	1519	1039	2201	1717	1193	1596	1423 4	1278 1	17467
per capita nett service cost \$ 2016	-69	-51	134	800	134	-50	409	708	753	779 5	391 8	3940
per capita nett service cost \$ 2020	155	263	-154	695	246	13	366	879	1075	886 8	447 7	4873
annual ave nett cost growth %	-65 0%	-122 8%	-42 9%	-2 6%	16 6%	-25 3%	-2 1%	4 8%	8 6%	2 8%	2 9%	4 7%
Per Property												
per property depreciation cost \$ 2016	806	672	852	1254	595	1019	1014	699	486	714	473	0
per property depreciation cost \$ 2020	1072	863	1144	1662	676	1420	1353	913	709	833	647	
per property depreciation change %	7%	6%	7%	7%	3%	8%	7%	6%	9%	3%	7%	

Appendix B: ABS Population Data in Local Government Areas

Measure	Estimated Resident Population								
Geography Level	Local Government Areas (2020)								
Frequency	Annual								
Time	2015	2016	2017	2018	2019	2020			
Region									
Australia	23815995	24190907	24601860	24982688	25365745	25697298			
New South Wales	7616168	7732858	7867936	7980168	8087379	8167532			
Albury (C)	51486	52171	52989	53705	54344	55055			
Armidale Regional (A)	29160	29310	29629	29705	29812	29704			
Ballina (A)	42336	42993	43480	44172	44622	45217			
Balranald (A)	2364	2330	2343	2338	2338	2306			
Bathurst Regional (A)	41694	42244	42806	43163	43612	43996			
Bayside (A)	159222	164534	170266	174218	178351	181472			
Bega Valley (A)	33713	33941	34117	34315	34473	34727			
Bellingen (A)	12936	12951	12951	12953	12993	13141			
Berrigan (A)	8568	8609	8667	8700	8750	8784			
Blacktown (C)	339449	348030	357839	366078	374372	382831			
Bland (A)	6027	6024	5988	5979	5971	5937			
Blayney (A)	7322	7343	7350	7334	7378	7382			
Blue Mountains (C)	78889	78835	79012	79191	79108	79195			
Bogan (A)	2846	2764	2666	2618	2580	2529			
Bourke (A)	2801	2762	2697	2626	2590	2625			
Brewarrina (A)	1762	1710	1671	1653	1611	1553			
Broken Hill (C)	18360	18114	17883	17715	17477	17269			
Burwood (A)	37822	38536	39348	39864	40596	40866			
Byron (A)	32803	33399	34011	34545	35075	35773			
Cabonne (A)	13511	13577	13612	13667	13632	13677			
Camden (A)	74100	80264	87146	94029	101420	107806			
Campbelltown (C) (NSW)	158589	161566	164649	167930	170912	174078			
Canada Bay (A)	90467	92534	94240	95064	96017	96550			
Canterbury-Bankstown (A)	356328	361862	368409	373486	377836	380406			
Carrathool (A)	2766	2793	2798	2799	2798	2796			
Central Coast (C) (NSW)	333264	336611	339394	341693	343922	345809			

Central Darling (A)		1923	1881	1847	1835	1839	1829			
Cessnock (C)		55888	56720	57561	59029	59978	61256			
Clarence Valley (A)		51547	51622	51596	51598	51656	51730			
Cobar (A)		4703	4687	4647	4628	4572	4417			
Coffs Harbour (C)		73739	74670	75552	76480	77265	77648			
Coolamon (A)		4366	4390	4392	4363	4341	4291			
Coonamble (A)		4091	4051	4036	4008	3957	3907			
Cootamundra-Gundagai Regional (A)		11302	11291	11249	11250	11233	11225			
Cowra (A)		12604	12659	12700	12753	12741	12730			
Cumberland (A)		221152	225691	231725	236599	241453	242674			
Dubbo Regional (A)		50847	51404	52133	53167	53710	54044			
Dungog (A)		9008	9101	9193	9336	9422	9664			
Edward River (A)		9012	8991	8955	8984	9083	9083			
Eurobodalla (A)		37733	37919	38097	38253	38469	38952			
Fairfield (C)		203490	205675	208636	210417	211654	210825			
Federation (A)		12470	12445	12450	12450	12435	12598			
Forbes (A)		9750	9817	9865	9898	9904	9920			
Georges River (A)		151069	153161	156435	158283	159431	160272			
Gilgandra (A)		4342	4298	4249	4221	4239	4229			
Glen Innes Severn (A)		8926	8934	8923	8900	8869	8873			
Goulburn Mulwaree (A)		29815	30261	30575	30823	31127	31554			
Greater Hume Shire (A)		10441	10519	10608	10675	10763	10841			
Griffith (C)		26171	26356	26608	26849	27022	27155			
Gunnedah (A)		12447	12491	12587	12643	12680	12690			
Gwydir (A)		5302	5326	5318	5344	5352	5299			
Hawkesbury (C)		65890	66346	66669	67007	67288	67749			
Hay (A)		2994	2984	2981	2975	2948	2943			
Hilltops (A)		18760	18756	18765	18759	18701	18617			
Hornsby (A)		146147	147385	149215	150632	152004	152419			
Hunters Hill (A)		14540	14656	14754	14898	14975	14962			
Inner West (A)		188711	191194	194744	197836	200720	201880			
Inverell (A)		17764	17815	17815	17801	17849	17780			

Junee (A)	6336	6414	6516	6625	6683	6676			
Kempsey (A)	29379	29431	29550	29633	29742	29921			
Kiama (A)	21890	22110	22461	22987	23383	23685			
Ku-ring-gai (A)	121315	122472	124515	125965	127079	127603			
Kyogle (A)	9197	9114	8982	8862	8796	8788			
Lachlan (A)	6541	6444	6317	6230	6160	6089			
Lake Macquarie (C)	201240	202332	203502	204694	205875	207775			
Lane Cove (A)	36402	37694	38780	39442	40128	40534			
Leeton (A)	11411	11407	11424	11425	11444	11343			
Lismore (C)	44212	44122	43930	43803	43687	43667			
Lithgow (C)	21400	21484	21577	21616	21603	21516			
Liverpool (C)	206205	211983	217788	223025	227545	231296			
Liverpool Plains (A)	7837	7847	7871	7886	7903	7853			
Lockhart (A)	3121	3173	3240	3290	3285	3259			
Maitland (C)	77374	79063	81049	83104	85155	87395			
Mid-Coast (A)	91038	91801	92500	93209	93826	94395			
Mid-Western Regional (A)	24374	24546	24827	25057	25248	25367			
Moree Plains (A)	13735	13627	13461	13331	13260	13077			
Mosman (A)	30045	30260	30588	30852	30960	30785			
Murray River (A)	11755	11872	11963	12105	12118	12330			
Murrumbidgee (A)	3893	3929	3955	3956	3917	3916			
Muswellbrook (A)	16435	16462	16445	16364	16375	16355			
Nambucca Valley (A)	19541	19580	19698	19752	19802	19861			
Narrabri (A)	13459	13367	13287	13216	13134	13049			
Narrandera (A)	5978	5949	5935	5924	5898	5858			
Narromine (A)	6668	6617	6584	6559	6516	6460			
Newcastle (C)	159680	160707	162477	163943	165541	167363			
North Sydney (A)	70860	71809	73112	74087	74957	75094			
Northern Beaches (A)	262593	265468	268870	271027	273409	274041			
Oberon (A)	5329	5349	5387	5403	5411	5419			
Orange (C)	40837	41210	41501	42000	42445	42503			
Parkes (A)	14954	14924	14916	14877	14835	14728			
Parramatta (C)	227649	234444	243557	251065	257094	260296			

Penrith (C)		197678	201597	205220	208947	212944	216282			
Port Macquarie-Hastings (A)		78997	80073	81441	83062	84515	85952			
Port Stephens (A)		70257	71115	71772	72630	73472	74506			
Queanbeyan-Palerang Regional (A)		57130	57790	58816	59889	61089	62239			
Randwick (C)		146908	148922	152149	154145	155521	156619			
Richmond Valley (A)		23148	23256	23331	23374	23462	23490			
Ryde (C)		118499	121270	124619	127340	131186	133224			
Shellharbour (C)		69474	70391	71036	72160	73225	74622			
Shoalhaven (C)		100550	101942	103061	104268	105637	107191			
Singleton (A)		23586	23576	23499	23397	23457	23380			
Snowy Monaro Regional (A)		20473	20558	20665	20714	20793	20997			
Snowy Valleys (A)		14640	14611	14559	14516	14476	14412			
Strathfield (A)		41276	42415	43852	45110	46896	47767			
Sutherland Shire (A)		225218	226461	227695	228980	230579	232369			
Sydney (C)		214037	222717	233177	240102	245942	248736			
Tamworth Regional (A)		60432	60990	61615	62086	62531	62545			
Temora (A)		6165	6210	6239	6267	6307	6274			
Tenterfield (A)		6713	6697	6660	6631	6594	6470			
The Hills Shire (A)		158941	162975	167954	172339	177927	183791			
Tweed (A)		92261	93742	94909	96018	96985	98382			
Upper Hunter Shire (A)		14412	14344	14274	14208	14178	14167			
Upper Lachlan Shire (A)		7804	7853	7914	7954	8059	8274			
Uralla (A)		6194	6147	6106	6057	6011	5944			
Wagga Wagga (C)		63327	63906	64312	64743	65249	65770			
Walcha (A)		3128	3130	3146	3129	3134	3105			
Walgett (A)		6419	6317	6197	6044	5952	5828			
Warren (A)		2783	2797	2765	2740	2697	2716			
Warrumbungle Shire (A)		9622	9562	9456	9389	9277	9209			
Waverley (A)		71336	72013	73386	74040	74222	74276			
Weddin (A)		3688	3677	3643	3632	3613	3596			
Wentworth (A)		6890	6932	6977	7033	7053	7090			
Willoughby (C)		75970	77888	79757	80274	81109	81196			
Wingecarribee (A)		48150	48998	49675	50452	51127	51760			

Wollondilly (A)		48562	49854	51036	52171	53143	54005			
Wollongong (C)		208313	210394	213281	215856	218076	219798			
Woollahra (A)		57513	57744	58504	58908	59345	59431			
Yass Valley (A)		16356	16568	16747	16936	17086	17321			
Unincorporated NSW		1106	1112	1085	1079	1026	961			
Unincorporated ACT		395813	403104	412025	420379	426285	431380			
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