IPART NSW Submission Feb 2018 Oppose Hawkesbury City Council Request for Special Rate Variation Increase

Submitted by: Sedema Pty Ltd Lorraine and George Charnas

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Sedema Pty Ltd

Lorraine & George Charnas



5 March 2018

Attention: Tribunal Members IPART

RE: Submission to Oppose Hawkesbury City Council Submission for a Special Rate Variation Increase.

Summary

Our submission opposes the Hawkesbury City Council (HCC) submission for a Special Rate Variation (SRV) increase at this time on the grounds set out herein.

HCC has consistently overlooked the concerns of ratepayers and managed the consultation process with ratepayers of the Hawkesbury in a disingenuous manner that has left ratepayers misinformed, confused or not informed at all. Crucial information was often delivered after the fact, such as in the case of amalgamation, or discriminatory rating policy. The majority of ratepayers still do not know what an SRV is or what it means for them. People who were polled were not advised of the real reason HCC is seeking an SRV. We will show that HCCs delivery of crucial information to ratepayers has also been inconsistent, obtuse or designed to get required answers for desired outcomes.

In the Council Rating and Revenue Raising Manual 2007 the fairness and appropriateness of rates are outlined as "The extent to which those who receive the benefits of councils' services also pay for those services - the so-called **benefit principle**" and "The extent to which those who pay for council's services have the ability to pay for those services - the so-called **ability to pay** principle". This manual also states that the "value of land is often no indication of the means of the owner". These guidelines are at odds with the actions of HCC, the lack of benefits received, and ability to pay in many rural suburbs of this LGA.

In changing the recommended base rate via "significant Powers" HCC contributed to the burden on many rural suburbs (affected suburbs), where rates were already circa double average rates, by essentially turning council rates into a constitutionally questionable land tax. The introduction of a rates reduction for circa 75% of ratepayers including advantaged suburbs, or minimal or no increases in some of the remaining 25%, had negative consequences for both affected suburbs and many poorer socio economic suburbs that were not treated fairly in the rate reduction/redistribution. The SRV increase will have an unreasonable impact on both groups, and will reflect a consolidation of a prejudiced and discriminatory policy that punishes people on the basis of their postcode.

When HCC seeks to dismiss "not support" opposition (Table 9 and related discussions) from some of the affected rural suburbs adjoining the North West Growth Sector, such as Oakville, Maraylya, and Windsor Downs, it does not say that there are other affected rural suburbs. These include but are not limited to Vineyard, Cattai, Scheyville and Pitt Town. HCC claims that the "primary issues" raised in the "not support" submissions: "seem to fall outside the scope of matters that can reasonably be responded to in conjunction with the consideration of a special rate increase and deferring the special rate increase will not in itself resolve these matters" (p. 46). That is not true. The "not support" objections from affected suburbs cannot be dismissed by HCC in this highly misleading manner, as we will show.

The failings of HCC in the financial and business operations management of this LGA are many. They are reflected in but are not limited to:

- ~ Heavy operating losses over 7 years
- ~ Neglect of assets
- ~ Debt
- ~ Excessive expenditure on salaries/wages, consultants and non-core matters
- ~ Poor investments and/or failure to maximise benefits of investments
- ~ A lack of provision for future development.

The result of these failings should not be imposed on a small number of ratepayers who have always received virtually nothing in the way of benefits for the heavy costs levied upon them and are now being gouged and dismissed. The many savings that could be made with prudent financial and business operations management, of the type that is a central to the success of any business, would negate the need for higher charges (SRV) at this time. In the absence of major reform any SRV increase will at best be an expensive wast of public and ratepayer money.

Productivity savings appear to be minimal in comparison to very high salary/wages expenditure and the outsourced quasi- salary/wages of consultants and contractors.

Using the IPART criteria below:

- ~ Lack of community awareness of plans
- ~ Unreasonable impact of Special Rate Variation Increase
- ~ Demonstrated need for higher charges
- ~ Sustainable financial strategy
- ~ History of well documented productivity improvements

We will show the ways HCC greatly contributed to the context of unreasonable impact that will be exacerbated by any SRV increase in many affected suburbs like Oakville, and many poorer socio-economic suburbs. Furthermore, without first addressing the root problem of poor financial and business operations management a SRV will be a waste of all ratepayers and public money.

SUBMISSION

This Submission opposes the Hawkesbury City Council (HCC) Submission for any Special Rate Variation increase (SRV) at this time. HCCs numerous failings and actions set out herein have greatly contributed to a context of unreasonable impact on many ratepayers that will be exacerbated by a SRV increase. An SRV will not address the root problem of inept financial and business operations management, and without major reform and training will be a waste of ratepayer and public money.

Evidence below is organised under IPART criteria headings but there may be some repetition when points overlap, or our interpretation varies from your own. We have not previously submitted an IPART submission, and are not privy to many council records, so we respectfully request Tribunal Members take these things into consideration when examining the arguments set out herein.

1. Lack of Community Awareness of Plans

On or about February 2016 at council amalgamation meetings conducted by Delegate ratepayers were assured by certain Hawkesbury City Councillors in words to the effect that HCC was "financially viable and fit for the future". We were also advised HCC had numerous assets. No mention was made of a SRV increase, what it was or that without it HCC was "not fit for the future". We were not told that assets were neglected and badly needed repair and upgrade. We were also not told that HCC had run operating losses of circa \$11million for many years. The major part of the KPG Report compiled on HCC regarding council amalgamation was withheld by the State Government so we could not accurately assess all parts. The parts that were released were at odds with HCC assurances of financial viability. On this basis many ratepayers, including us, opposed amalgamation when it was in our interest to support it.

At "fit for the future" information meetings at Pitt Town and Oakville on or about July 2017, immediately after huge rate rises of circa 100% to 180+% (appendix 1 and 2) to some rural suburbs like Oakville, ratepayers were advised quite differently. HCC representatives said in words to the effect, that HCC was "not financially viable without a Special Rate Variation increase ideally circa 31% over three years". This was not explained to us in February 2016. It was essential to fully disclose to ratepayers what a SRV was and how it would negatively impact the cost of rates before any support was sought from ratepayers to oppose amalgamation.

In Table 9, point 9, HCC claims that amalgamation would not have occurred because HCC was 'fit for the future'. It seems HCC was not fit without the SRV being central to the strategy not yet disclosed to ratepayers. Without a SRV, or the volume of ill-informed ratepayer support, and given the evidence revealed in its financial statements and other documents, that is highly debatable, and explains HCCs lack of transparency and failure to disclose in February 2016.

Kiosks and meetings explaining the meanings of SRV and "Fit for the Future" were all after the fact, in June 2016, and that is unacceptable failure to disclose. Further, we do not recall seeing kiosks or being invited to any meetings. In an HCC email to us some months ago, it was conceded that their communication needed improvement. At the meeting in July 2017 concerned ratepayers impacted by huge

rate rises were directed by HCC representatives to three options for a SRV and sold hype about the improved services benefits of option 3 but it seems that is **not the real reason disclosed in Part B of the submission**. It is a concern that HCC documents are obtuse, voluminous, inconsistent, and dialogue with ratepayers has been misleading.

HCC does not say in the submission that it was advised by the Valuer General (VG) in December 2016 of greatly increased land values in affected suburbs including Oakville. HCC does not say it voted months after receipt of this advice to adopt a changed base rate via 'Significant Powers', and the change together with a discriminatory rate reduction for 75% of ratepayers seriously impacted the rates of affected suburbs and others. HCC should have contacted us directly but did not do so. We were taken by surprise and did not have time to budget for huge rate rises that arrived in mid-June 2017.

We saw no evidence of extended hardship provisions claimed by HCC in Table 9 point 4 when we called for an extension of time to pay. An HCC representative advised that 7% interest applied to late payments. It was an unacceptable response given huge rate rises. Many people refused to pay interest and made other arrangements or went without essentials.

The HCC telephone poll of circa 400 people was hardly representative, but rather showed how many people did not want higher rates. The type of questions posed also determined the type of answers received. Everyone would like more or better services, or in the case of Oakville and other rural areas, any services. Asking people if they would pay a bit more for better services is not accurate disclosure. Circa 400 people surveyed are not representative of circa 66,000 people in such a diverse LGA where services have been poor for a very long time. It is also a concern that ratepayers were misled about the real reason for a SRV increase disclosed in Part B of the submission to IPART relating to asset repair/upgrade and borrowings, and not better services, as we were.

We disagree with HCC in Table 9 point 7. HCC has consistently ignored the concerns of ratepayers and managed the consultation process in a disingenuous manner. The majority on HCC have resisted all attempts to reason with them on unfair rates, and Hon Mayor Lyons Bucket and Councillor Wheeler have on numerous occasions been rude and disrespectful. We tried many avenues to engage with HCC in our search for fair treatment, to no avail.

We objected to HCC in writing and attended Council meetings where Oakville speakers tried to address rates unfairness before seeking an SRV. On more than one occasion Councillor Wheeler told Oakville ratepayers, myself included, in words to the effect "that we should sell and leave", and we had "disadvantaged poorer suburbs like Bligh Park.." addressing us in a disrespectful manner. Hon Mayor Lyons Bucket stood at the door after one meeting and addressed some elderly people who were visibly upset and others, in words to the effect "that they could sell their property" and made inappropriate comments to them about "wealth and leaving debt to their children". Ratepayers expect a measure of courtesy and appropriate behaviour from its representatives that has been sadly lacking in these two people.

We raised our concerns with a minority of Councillors who did not vote for the changed base rate. They argued strenuously on numerous occasions to have unfair

rates dealt with before seeking a SRV, but their advice was not heeded by the majority HCC, even in a workshop purportedly to discuss this matter. We attended a newly formed Oakville Progress Association which allowed a forum for community support and action and they will make their own submission in due course.

We contacted the office of the Hon Member for Hawkesbury, who wrote to say he had raised our concerns with HCC. When Lorraine Charnas later spoke to this matter at a Council meeting in late 2017 and sat down,

On this same occasion Madam Mayor also advised on record in words to the effect: "council rates were not a fee for services". We disagree

and argue that neither are they a council land tax for no services.

2. Unreasonable Impact of a SRV Increase

The current HCC took office on the elected promise of making rates fairer. However, a majority on Council changed the rating category in affected suburbs including Oakville from 'Rural Residential' to 'Residential', and introduced a changed base rate via its 'Significant Powers' under *The Local Government Act 1993*, that raised the land value component of rates from the recommended amount. For a number of reasons this was not an appropriate use of the 'Significant Powers'.

HCC was advised by the VG in December 2016 that land value had greatly increased in many rural suburbs particularly those impacted by development (NW Growth Sector) such as Oakville, Maraylya, Windsor Downs, Vineyard, but also others like Cattai, Scheyville, Pitt Town. So, when Council increased the land value component of rate calculations some 4 months later they knew their actions would exacerbate the unreasonable impact on rates in many affected suburbs that were already paying double the average rates in this LGA for virtually no services.

Council then reduced rates to 75% of ratepayers, not as implied in Table 9, point 2 and related commentary of its submission, and not as clearly stated in

It was not an attempt to restore fairness to poorer socio-economic suburbs. Many of the suburbs that received rate reductions, remained stable, or were only marginally increased, were advantaged suburbs, like Kurrajong, Kurrajong Hills, Kurrajong heights, East Kurrajong, and Grose Vale. Bligh Park which has a large number of defense homes, has 9.3% of dwellings paying 6.8% of rates after a rate reduction of .6, and a median household weekly income of \$1,763.00 pw. The reduction had little or no benefit for many more disadvantaged suburbs like Hobartville which has 4.5% of dwellings paying 3.8% of rates. It received a tiny .1% reduction, and with a median household income of \$1,411.00 pw it will now be unfairly impacted by a SRV. Inequity of many suburbs is revealed in (Appendix 3, and 4, ABS 2016).

In Table 9, point 2 HCC implies, but it was clearly stated by Councillor Wheeler on record that some of the affected suburbs have "disadvantaged poorer socioeconomic suburbs", we refute that. Suburbs zoned rural small holdings 4U or any other rural suburb that has an incorrect residential category have always paid double or more than average rates for virtually no council services other than refuse collection. Oakville now pays 4 – 8 times more (Appendix 1 and 2) than the

average, an extra \$1 million dollars in rates this year for circa **585** homes, making a total of **\$1.8 million**. **Oakville pays circa 6.6% of rates when we are only circa 2.4%** of dwellings /ratepayers. Other affected suburbs can be viewed in Appendix 3 and 4. In total they are almost 5,000 dwellings that already pay too much and will pay much more with an SRV increase, increased land values and unfair rate distributions in the next rating year. Many of us have zoning restrictions not consistent with a residential category. Land value is not a fair measure of capacity to pay as confirmed in the *Council Rating and Revenue Raising Manual* 2007, as it creates inequality. It is why the recommended base rate of 50% should not have been altered by HCC.

By way of comparison, and to highlight the disparity, Kurrajong Heights, Kurrajong Hills and parts of Kurrajong have similar or higher median household incomes than Oakville (Appendix 3 and 4, ABS 2016). Rates were similar until recently. Appendix 3 and 4 shows there are many suburbs that have similar or higher household incomes to Oakville that have not been impacted in the same way. Rates in Oakville with only 585 occupied dwellings (ABS 2016) are paying between circa \$4,200.00 pa and circa \$9,000.00+ pa. Post SRV, rates in Oakville will increase to between circa \$5,400.00 pa to \$12,000.00+ pa, and more when VG land values increase in July 2018, while in the three suburbs of Kurrajong they would only increase to circa \$2,400.00 pa or less. The three suburbs of Kurrajong identified above have a combined number of dwellings/ratepayers of 7.8% and pay a total of only 8.2% of rates. Oakville has 2.4% of dwellings/ratepayers and pays 6.6% of rates. That is discrimination. (Appendix 3 and 4) Oakville rates increased to 4-8 times average rates. It is unaffordable.

VG valuations show that land values and by extension Council land tax will increase again next year notwithstanding the SRV increase, but that has not been disclosed to you. These are massive unreasonable costs for many elderly people on pensions, small farmers, self-funded retirees, like us, small business owners and mortgagees. Many are on low incomes, or super annuities like us. There are not a small number of people in this position, as indicated by HCC in Table 9 point 4. Market gardens and poultry farms are producing essential food products that have not increased in value for a decade. We have not operated a business since 2013, but it is certain some will be paying land tax to the State Government as we do. There are a larger proportion of older people in our street.

In Oakville and other rural suburbs zoned rural smallholdings 4U but rated as residential, we have virtually no Council services or infrastructure and fewer rights than do non-rural residential suburbs to warrant either the huge unfair Rate rises or an SRV increase. There are:

- ~ no footpaths, curbs, gutters or bike lanes
- ~ no verge mowing
- ~ no street lights
- ~ no sewerage pump-out services
- ~ no public transport
- ~ no dual occupancy rights we cannot subdivide
- ~ very poor roads, some unsealed

HCC claims it "...has made a submission to the IPART review of the local government rating system to increase the equity of rating methodologies.." (Table 9 point 1) It is galling to read this when HCC itself changed rating by changing the

recommended base rate via 'Significant Powers' knowing it would impact most on affected suburbs, and gouged more money from us by giving discriminatory rate reductions to 75% of the LGA, including advantaged suburbs, or increasing them marginally or not at all, thereby disadvantaging poorer and affected suburbs.

Council's recent questionable decisions have created unreasonable impacts that will be compounded by a SRV increase. It will cause great hardship and we feel helpless, victimised and abandoned by our Council who we have always supported. We are being driven out of our homes and would like to be reassured that there is no connection with HCC Councillors/decision makers and developers in nearby developments or who have bought properties in Oakville for that purpose.

3. Demonstrated Need for Higher Charges - Shortfalls Due to Misuse of Powers, Overspending and Poor Financial Management

Poor financial and business operations management are **the root cause** of why higher charges (SRV) are being sought by HCC. An independent audit, not one commissioned by HCC would reveal the many failings (see point 4 below) that have caused an enormous loss of revenue for this LGA.

If HCC adhered strictly to Core responsibilities and stopped wasting public money on non -core matters, massive consulting and contracting fees. HCC has very high executive salary expenditure and this should be examined in relation to performance outcomes (dismal outcomes given the financials) and what is appropriate cost for this Council. Costs savings here should be directed to repair and upgrade of assets that HCC claims are in decline, but is that the case or will the borrowings sought be used to settle depreciated debt and continued over expenditure?

The changed base rate will ensure any property where land value increases will pay more next year given the changed base rate. It is the reason HCC wishes to change the rate peg. Notwithstanding inequity, this will ensure further revenue windfalls especially in affected suburbs and others given property trends, so there should be no demonstrated need for higher charges until property prices decline.

Reform of financial and business operations management would negate the need for higher charges (SRV) at this time. Without major reform to the financial and business practices, higher charges (SRV increase) will be squandered by HCC in the same way public monies have been for too long. If all these savings are made, and the arguments we put in points 4 and 5 are considered, HCC would start to operate in a more commercially acceptable way and higher charges would not be necessary at this time. If it does not do so, it should not be allowed to continue operating at all.

4. Sustainable Financial Strategy

We were shocked to find that HCC has had heavy operating losses of circa \$11 million dollars for 7 years and has engaged in excessive and unsustainable spending. Salary/wages to rating revenue ratio is totally unstainable. It appears that salaries/wages are circa \$25 million and rates revenue is circa \$30 million. That is

appalling, and we want to know where the other \$5 million was spent. There has been excessive expenditure on consultants, contractors and non-core matters, high end salaries that have wasted valuable revenue. Some investments such as the power generation plant and waste lease with WSU have consumed an unacceptable amount of revenue. The revenue should have been directed to core expenditure, repair and upgrade of assets and reducing long standing debt. It is also worrying that so many new employment positions have recently been advertised by HCC.

Assets should not have been neglected for so many years, and it seems no attempt was made to set aside funds to correct the decline. Previous HCCs identified the need for a much smaller SRV increase circa 14% to address this problem but were overruled by the same Councillors who now constitute a majority in the current Council and are seeking the highest SRV of circa 31%. Why did they allow assets to deteriorate in this way? It appears that depreciation has not been dealt with appropriately and this needs careful examination. HCC has no real long term financially sustainable strategy other than more borrowing, a SRV increase, and essentially turning council rates into a Land Tax regardless of services provided or a constitutional right to do so, it is why they want the rate peg changed.

The changed base rate is a lucrative source of ongoing revenue that is not clearly disclosed to you when seeking to change the rate peg (table 9 point 10). Despite it being lucrative, a changed base rate essentially made council rates a land tax. It is a risky financial strategy. Company property such as ours is already paying very high land tax to the State Government. Now we also pay a Council land tax on the same property regardless of services provided or restrictions not consistent with its residential rating category. Only the State Government is constitutionally entitled to levy land tax and that must not be applied twice to the same property. The Council claims they have acted in accordance with *The Local Government Act 1993*, but that is debatable, particularly in the case of company owned land that already pays land tax. There is a reason the recommended calculation of land value in rates is 50%, as it avoids the legal implications of making it a council land tax, and it allows for fairer distribution of rates.

In Part B of HCC submission, the main purpose of the SRV is for asset upgrade and renewal and to attend to long standing debt. **That is inconsistent with what has been told to ratepayers.** It is unclear if HCC intends to raise more borrowings to settle the depreciated debt. It is unlikely it will be used for services for affected suburbs. We trust that a changed rate peg will not be used to further impact affected and poorer socio-economic suburbs, given the unconscionable actions already conducted by HCC. As we stated above, it is a concern that HCC documents are obtuse, voluminous, inconsistent, and dialogue misleading. Ratepayers must have access to council data and it must be presented in a transparent manner.

It would seem from available evidence previous HCC's have introduced fees for certain services to improve income and this improved revenue minimally. To our knowledge no HCC in the past decade has reduced long-standing liability. If Council has circa \$1 Billion in assets as claimed, then poorly performing assets should be sold to free up resources to upgrade high performing assets and reduce long term deficit rather than seek more borrowings at a time when interest rates are set to rise. Reputable Real Estate Agents could assist this process rather than employing expensive consultants.

Given that HCC already leases a large proportion of the Council Chambers asset, this asset would provide a very lucrative return if sold. HCC could make a sale conditional upon a long term, predetermined lease back agreement, and conditional upon the public revenue being directed only to core expenditure, repair and upgrade of other high performing assets, and to investment in higher performing assets. Many successful commercial businesses operate in this way.

A SRV increase should be the last option, but it appears it is the main option adopted by HCC in long term financial strategy due to poor financial and business management practices and the "fit for the future' strategy. Even so, previous HCC Councils have not introduced discriminatory and prejudiced policy and did not increase rates by circa 110% to 180+%. They may have expected ratepayers to pay a SRV increase of 14% but that would have been in the context of fairer rates. If a 14% SRV increase had been applied years ago when it was first proposed assets would not be neglected and borrowing/SRV would not be required.

There are definitely other options to a SRV increase and the main one is major financial and business operations reform. There is also urgent need of an independent audit not commissioned by HCC, performance reviews of executive decision makers, and training for councillors and decision makers in appropriate use of public money, care of public assets, and the consequences of changing recommended guidelines via "Significant Powers".

5. History of Well Documented Council Productivity Improvements

HCC operating losses are circa \$11 million for 7 years and salary/wages appear to be circa \$25 million dollars while Rates revenue is only circa \$30 million. If that is the case then productivity improvement of less than 1% are totally unacceptable and not in line with best business practice. From 2007 there is some evidence of HCC productivity improvement largely related to the lower end of the wages/operating costs spectrum where it can least be spared and not to top end executive salaries.

The percentage improvement to HCC productivity is too small to be meaningful. The costs of consulting and contracting are unaffordable and must be investigated. Some are really quasi-salary/wages. Given the massive wages bill some of this outsourced work could be performed by council employees. Executive salaries should be assessed for performance outcomes given the dismal financial and operating losses.

Productivity improvements may be well documented from 2007 but they are not in line with best business practice given huge salary/wages costs and outsourced work. It is difficult to comment further without access to independent performance outcome reviews.

6. Conclusion

HCC has consistently overlooked the concerns of ratepayers and managed the consultation process with ratepayers of the Hawkesbury in a disingenuous manner.

Crucial information is often provided after the fact, such as in the case of amalgamation, or in a manner that is often inconsistent, misleading or designed to get required answers for desired outcomes, not from genuine feedback. The majority of ratepayers still do not know what an SRV is or what it means for them, and people who were polled were not advised of the real reason HCC is seeking an SRV.

Council Rating and Revenue Raising Manual 2007 guidelines regarding fairness and appropriateness of rates and the limitations of using land value to determine ratepayer capacity to pay are at odds with the actions of HCC, the lack of benefits received, and capacity to pay in many affected suburbs of this LGA.

In changing the recommended base rate via "significant Powers" HCC contributed to the burden of affected suburbs by essentially turning council rates into a constitutionally questionable land tax. The introduction of a rates reduction for circa 75% of ratepayers, including advantaged suburbs, had negative consequences for both the affected suburbs where it heavily increased the rates of almost 5,000 properties, and scarcely reduced those of many poorer socio economic suburbs that were not treated fairly in the rate reduction/redistribution. The SRV increase will have an unreasonable impact on both these groups, and will reflect a consolidation of a prejudiced and discriminatory policy targeting people on the basis of their postcode. We are being forced out of our homes and will take action to prevent it.

The financial and business management failings of HCC warrant an independent audit not commissioned by HCC. These failings are reflected in but are not limited to: heavy operating losses of circa \$11 million over 7 years; long term neglect of assets; debt; excessive expenditure on salaries/wages, consultants and non-core matters; poor investments and/or failure to maximise benefits of same; very small productivity savings in comparison to very high salary/wages expenditure; a lack of provision for future development. The result of these failings should not be imposed upon any ratepayer, especially a small number of ratepayers in affected suburbs who have always received virtually nothing in the way of benefits for the heavy costs levied upon them.

Our submission has shown how HCC greatly contributed to a context of unreasonable impact that will be exacerbated by any SRV increase in affected suburbs like Oakville and some poorer socio-economic suburbs. As a result, we cannot afford to pay any SRV increase proposed by the majority HCC. We now refer the matter to IPART and thank the Tribunal Members for considering our strong objection to HCCs submission for any SRV increase at this time on the grounds presented.

Yours Sincerely,

Lorraine and George Charnas

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rates and charges notice

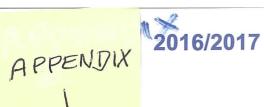
Address: 366 George Street
WINDSOR NSW 2756

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DX: 8601 WINDSOR
Phone: (02) 4560 4444
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Monday to Friday 8:30am-5pm







RATES AND CHARGES notice

APPENDIX



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11.

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APPENDIX 3

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	<u>C</u>	ensus)			
LOWER MACDONALD	\$	1,187	0.8%	0.6%	
ST ALBANS	\$	912	0.4%	0.3%	
BOWEN MOUNTAIN	\$	1,724	2.0%	1.6%	
BLIGH PARK	\$	1,763	7.4%	6.8%	
SOUTH WINDSOR	\$	1,283	7.8%	7.0%	
RICHWOND	\$	1,146	7.6%	6.7%	
KURRAJONG HEIGHTS	\$	2,042	2.0%	1.8%	
WINDSOR	\$	1,422	2.7%	2.4%	
HOBARTVILLE	\$	1,411	3.9%	3.8%	
MCGRATHS HILL	\$	1,925	3.3%	3.2%	
NORTH RICHWOND	\$ \$	*	8.3%	7.2%	
GLOSSODIA		1,426	3.9%	3.6%	
LOWER PORTLAND	\$	1,910	0.7%	0.6%	
BILPIN	\$	1,569	1.4%	1.2%	
AGNES BANKS	\$	1,455			
	\$	1,910	0.8%	0.8%	
BLAXLANDS RIDGE	\$	2,134	0.9%	0.9%	
KURRAJONG	\$	2,005	5.1%	5.1%	
WILBERFORCE	\$	1,867	4.8%	4.7%	
FREEMANS REACH	\$	1,885	3.4%	3.3%	
KURMOND	\$	1,723	1.4%	1.5%	
EAST KURRAJONG	\$	2,187	3.2%	3.3%	
YARRAMUNDI	\$	2,228	1.2%	1.2%	
EBENEZER	\$	1,886	1.7%	1.7%	
GROSE VALE	\$	2,128	2.1%	2.2%	
KURRAJONG HILLS	\$	2,277	1.3%	1.3%	
THE SLOPES	\$	2,113	0.5%	0.6%	
PITT TOWN	\$	2,316	5.7%	6.3%	
GROSE WOLD	\$	2,239	1.1%	1.2%	
VINEYARD	\$	1,197	1.7%	2.4%	
TENNYSON	\$	1,963	0.8%	0.9%	
WINDSOR DOWNS	\$	2,458	1.9%	2.4%	
CATTAI	\$	2,013	0.8%	1.1%	
MARAYLYA	\$	2,133	1.3%	1.8%	
OAKVILLE	\$	2,095	3.2%	6.6%	
Grand Total			95.4%	96.1%	
				/	
			+in-/		
	suburbi net included			surbs included	
			110 (

APPENDIX 4

Locality	Number of dwellings	Percentage of dwellings	
LOWER MACDONALD	242	1.0%	
ST ALBANS	127	0.5%	
BOWEN MOUNTAIN	586	2.4%	
BLIGH PARK	2243	9.3%	
SOUTH WINDSOR	2297	9.5%	
RICHMOND	2177	9.0%	
KURRAJONG HEIGHTS	542	2.2%	
WINDSOR	713	3.0%	
HOBARTVILLE	1081	4.5%	
MCGRATHS HILL	898	3.7%	
NORTH RICHMOND	1967	8.1%	
GLOSSODIA	968	4.0%	
LOWER PORTLAND	165	0.7%	
BILPIN	308	1.3%	
AGNES BANKS	183	0.8%	
BLAXLANDS RIDGE	206	0.9%	
KURRAJONG	1108	4.6%	
WILBERFORCE	1031	4.3%	
FREEMANS REACH	731	3.0%	
KURMOND	306	1.3%	
EAST KURRAJONG	672	2.8%	
YARRAMUNDI	247	1.0%	
EBENEZER	345	1.4%	
GROSE VALE	430	1.8%	
KURRAJONG HILLS	251	1.0%	
THE SLOPES	106	0.4%	
PITT TOWN	1127	4.7%	
GROSE WOLD	210	0.9%	
VINEYARD	382	1.6%	
TENNYSON	141	0.6%	
WINDSOR DOWNS	361	1.5%	
CATTAI	156	0.6%	
MARAYLYA	249	1.0%	
OAKVILLE	5 84	2.4%	
Grand Total	24152	95.8%	
	Tmy suburbs		