

28<sup>th</sup> April 2021

## Submission as part of the “Review of the rate peg to include population growth.”

Independent Pricing and Regulatory Tribunal  
PO Box K35, Haymarket Post Shop  
Sydney NSW 1240

Dear Tribunal Members,

The Western Sydney Regional Organisation of Councils welcomes the opportunity to make a contribution to the Review of the rate peg to include population growth. Notwithstanding that individual member Councils will be making individual submissions we make comment on a number of broader issues that should be considered as part of the Tribunal’s deliberations.

WSROC has been advocating for some time that a broad-based review of the financial capacity of councils to meet the current needs and future aspirations of its communities is urgently needed. To this end WSROC had written to the Premier of NSW<sup>1</sup> to consider a broad-based review of the financing and funding arrangements affecting local government.

Additionally, WSROC had written to the Premier of NSW<sup>2</sup> addressing the limitations of, the then Sect 94 Contributions and the associated Essential Works List.

Unfortunately, the State Government continues to take a fragmented and piecemeal approach to address singular issues that are largely symptoms of an outdated policy framework and an unjustifiable lack of confidence in local government to manage its own affairs.

### **The burden of population growth on Councils is not just the numbers.**

The burden of population growth on individual Councils should be considered from both a quantitative and qualitative perspective. That is to say, infrastructure and service delivery needs are not just driven by the actual increases in population but also by other “qualitative” population factors, that include for example;

- cultural backgrounds,
- socio-economic groupings, i.e., refugees,
- health and education challenges,

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1 Letter to the Premier and Minister for Local Government dated 5 November 2019.

2 Letter to the Premier Liveability in Greater Western Sydney – social infrastructure and the impact of Sect 94 Contributions and the Essential Works List dated 25th May 2018.

- level of expertise and skills “attractiveness”,
- concentrations of vulnerable communities.

WSROC notes a recent example of Commonwealth and State refugee policy<sup>3</sup> that created an unprecedented crisis in Western Sydney because of a large number of refugees settling in a few but highly concentrated areas with limited support from either the Commonwealth and State Governments when it came to the provision of additional infrastructure and local support services.

### **Percentage increases in population growth are meaningless when considering actual impacts on LGAs.**

The Issues Paper makes reference to an “average” council when determining the rate peg. WSROC considers that using a contrived “average” council that somehow reflects the substantial diversity of Councils and their respective communities as the basis for making rate peg decisions is flawed.

Using an averaging technique masks both the nature and scale of the challenge before individual Councils. Equally, using % increases in population growth as a main criterion to consider in making changes to the rate peg is also flawed.

Consider that a 1.5% increase in population for Hunters Hill Council would result in 225 additional residents for an LGA with well-developed infrastructure and relatively easy access to local support services. In contrast a 1.5% increase in population for Blacktown City Council would result in an additional 5,250 residents spread across poorly serviced high growth areas (i.e., Marsden Park) and established but poorly serviced areas.

The two examples demonstrate the variation in the burden on the affected Councils, Hunters Hill Council could probably absorb the increase with little impact to its operations whereas Blacktown City Council would be required to make significant investment in local (social and enabling) infrastructure and local support services.

### **Addressing diversity and inequities.**

LGAs just across Sydney vary significantly across so many dimensions, for example in;

- physical size, Hunters Hill LGA 6 sq km and Hawkesbury LGA 2,800 sq km,
- actual population numbers, compare Hunters Hill 15,000 residents and Blacktown with 375,000 residents,
- the nature and scale of vulnerable communities, most of these (economic and health related) are in Western Sydney,
- historical disadvantage caused by unfair policy frameworks and/or political influences, for example continuing deficits of infrastructure relative to needs or relative to other LGAs and a lack of local support services,
- variable growth projections, and
- “attractiveness” to special communities i.e., refugees concentrating in established communities from the same cultural background.

Historical and continuing place-based inequities and the substantial diversity within and across LGA must be factored into adjusting the rate peg formula to account for “population” growth.

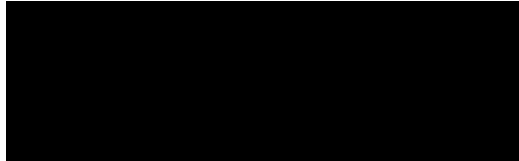
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<sup>3</sup> Letter to Minister Tudge Supporting humanitarian entrants and asylum seekers dated 14th April 2020.

**WSROC support for a population growth factor that is LGA specific.**

For the reasons noted in this paper WSROC supports a population growth factor that is LGA specific and that incorporates a mechanism that allows for correction of historical and place-based inequities over the longer term.

Yours sincerely,



Charles Casuscelli RFD  
CEO

**Attachments.**

1. Letter to the Premier and Minister for Local Government dated 5 November 2019.
2. Letter to the Premier Liveability in Greater Western Sydney – social infrastructure and the impact of Sect 94 Contributions and the Essential Works List dated 25th May 2018.
3. Letter to Minister Tudge Supporting humanitarian entrants and asylum seekers dated 14th April 2020.

5 November 2019

The Hon. Gladys Berejiklian MP  
Premier NSW  
GPO Box 5341  
SYDNEY NSW 2001

The Hon. Shelley Hancock MP  
Minister for Local Government  
GPO Box 5341  
SYDNEY NSW 2001

**Review of the financing and funding arrangements affecting local government.**

Dear Premier and Minister,

We noted with much interest the first major publication from the independent, expert panel, appointed by NSW Treasurer, Dominic Perrottet, to review financial relations between NSW and the Commonwealth released on Monday the 21 October 2019.

The *NSW Review of Federal Financial Relations* discussion paper examines how NSW and the Commonwealth can work together to build a stronger economy, encourage state-led reform, and ultimately, deliver better value for taxpayers.

WSROC is calling on the NSW Government to refer the financial and funding arrangements between local government and the other two levels of government to the expert panel, appointed by NSW Treasurer Dominic Perrottet that has recently released its *NSW Review of Federal Financial Relations* discussion paper.

As you no doubt are aware, the major growth areas for the foreseeable future all occur in Western Sydney. The growing needs and expectations from residents and workers alike for funding appropriate levels of services and social infrastructure is far in excess of what current funding mechanisms provide.

The current IPART Reviews into local government are necessary but far too limited in scope by just focussing on the local government rating system, reporting and compliance costs.

We are asking for a review of federal/state financial relations affecting NSW local government.

The discussion paper should examine how NSW local government and the NSW and Commonwealth Government can work together to build a stronger economy, encourage reform across all three levels of government, and ultimately, deliver better value for taxpayers/ratepayers.

The panel should be tasked with investigating options for a fairer, more efficient and more reliable system of Commonwealth and state funding for local government.

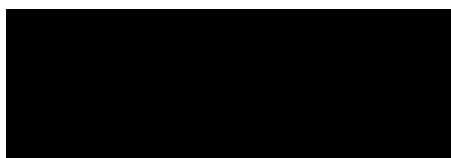
Local government has been, and continues to be subject to:

- cost-shifting over a period of several decades;
- unnecessary artificial constraints on its ability to levy fees and charges;
- a complicated series of funding arrangements and partnerships with the Commonwealth and state governments that can change at the whim of either;
- a growing liability for unfunded infrastructure especially in growth areas; and
- faces significant challenges as population ages, technology advances and work patterns change.

The challenge for the expert panel would be to identify options and ways that can improve the system and at the same time promotes a stable and reliable revenue base to fund essential services and infrastructure into the future.

The CEO of WSROC, Charles Casuscelli, is available to discuss this in detail and answer any questions that you may have. We would be delighted to work with the NSW Government and look forward in hearing from you on this critical issue for the future of local government.

Kind regards,



Councillor Barry Calvert  
WSROC President

**For Information:**

Councillor Linda Scott, President Local Government NSW

Councillor John Faker, President SSROC

Councillor Gail Giles-Gideny, President NSROC

25<sup>th</sup> May 2018.

The Hon Gladys Berejiklian, MP  
Premier of NSW

**Liveability in Greater Western Sydney – social infrastructure and the impact of Sect 94 Contributions and the Essential Works List.**

Dear Premier,

Thank you for the meeting on Monday at which I briefly introduced the case for including certain social infrastructure (community facilities buildings) in the Department of Planning & Environment's (DPE) Essential Works List (EWL).

The prosperity of Greater Western Sydney, according to all three levels of Government, will be built fundamentally on two key themes, the creation of jobs and the enhancement of liveability throughout the region. Liveability is as much determined by the adequate provision of social infrastructure as it is on the provision of roads, hospitals and schools.

The exclusion of levying for certain social infrastructure such as community facilities buildings will see an incoming population of close to 1 million people throughout GWS have no or little access to;

- libraries,
- swimming pools,
- youth centres,
- amenities blocks on sporting fields, and
- community meeting spaces.

As an example for the Blacktown LGA, the funding required for these facilities to accommodate its growth over the next 20 years, at a standard which was permitted by Government until they were removed from the Essential Works List has been assessed in detail at \$276M. The funding required throughout the region for this "unfunded" social infrastructure has been estimated at over \$2 billion over the next 20 years.

## **History of the Essential Works List.**

In 2008, Premier Nathan Rees capped Section 94 contributions across the state to \$20,000 per lot/dwelling – see Annex A.

After intense lobbying from NSW councils the government increased the cap for greenfield areas to \$30,000 per lot/dwelling and established a Priority Infrastructure Fund (now Local Infrastructure Growth Scheme (LIGS)) for councils to receive contributions above either cap.

Funding was conditional on 2 criteria:

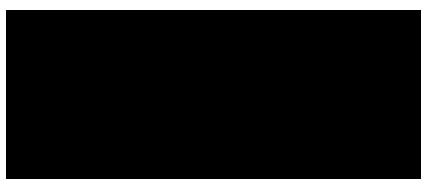
- The relevant contributions plan proposing a contribution above the cap required IPART assessment and approval by the Minister for Planning.
- Contributions plans could only contain infrastructure prescribed in a new list established by DPE, the 'Essential Works List'.

***The EWL categorises Community Facilities as non-essential.*** The list essentially has not changed since its inception and a copy of the current EWL is provided at Annex B.

The DPE recently established a Taskforce to review the EWL. However, we understand that Community Facilities will again be deemed non-essential.

It may well be that “growth areas” could attract an expanded EWL to include community facilities buildings such that the liveability objectives, supported by all three levels of Government can actually be achieved. The current situation is neither sustainable nor does it produce communities that are resilient.

Yours sincerely,



Charles Casuscelli RFD  
CEO

## **Annexes.**

- A. News Release Premier of NSW dated 17 December 2008.**
- B. DPE Extract – Current Essential Works List.**

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## NEWS RELEASE



Premier of New South Wales  
Australia

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### Premier announces plan to kick-start housing construction

17 December 2008

Premier Nathan Rees today announced the Government's plan to boost the NSW housing industry and improve housing affordability for families.

Mr Rees said that the Government will deliver much needed reforms to infrastructure levies.

"The Government will reduce levies that are charged on new developments by up to \$64,000 per lot," Mr Rees said.

"Water levies, state government levies and local government levies charged to new developments will all be reduced as part of the plan, including:

- Cutting state infrastructure charges in the south west and north west growth centres from \$23,000 to around \$11,000 per lot until June 2011.
- Abolishing infrastructure levies payable to Sydney Water Corporation and Hunter Water, saving up to \$15,000 per lot.
- Capping infrastructure contributions payable to local councils at \$20,000 per lot – with all contributions exceeding \$20,000 requiring approval from the Planning Minister.

"We have listened to industry and local government and it is clear in some areas levies have been too high and have been slowing the construction of new homes," Mr Rees said.

"We have also changed the timing of the payment of the reduced levies – they will no longer be charged up front and will now be charged when the lot is sold.

"The NSW housing sector has been hit especially hard by the economic downturn.

"Last financial year there was a 4.6% drop in development applications across NSW and only 16,000 new houses were constructed – compared to 31,000 in Victoria and 30,000 in Queensland," Mr Rees said.

"There is a clear need to stimulate the housing industry, which is vital to the state's economy.

"That's why we are delivering the necessary changes to create the right conditions for a recovery in the housing sector."



Mr Rees said today's plan to improve housing affordability builds on recent measures to help families including:

- An additional \$3,000 grant for families building their first home or buying a newly-constructed home – taking the total grant to \$10,000;
  - Delivering cheaper public transport for families - every Sunday from December 21 families will be able travel anywhere in Sydney by bus, ferry or train for just \$2.50 per ticket; and
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- Offering \$1 fares for children over summer travelling to any of the of the 360 destinations on the CountryLink network.

The reforms follow a review of infrastructure levies announced as part of the Mini Budget in November. The review has included consultation with industry groups and local government.

“These changes simplify the structure of levies, reduce unnecessary holding costs and reduce the overall contribution required from new developments,” Mr Rees said.

“They will reduce the cost of developing land, particularly in north west and south west Sydney, and I want to see those savings passed on to home buyers.

“As interest rates continue to fall, and land is able to be developed more cost effectively, the conditions will be right to support a recovery.

“Housing construction is one the great multipliers in our local economy and these measures are designed to stimulate construction and create jobs.

Planning Minister Kristina Keneally said that the NSW Government has made significant reductions to state infrastructure levies, and we hope to see councils follow our example.

“In particular, we do not want to see Voluntary Planning Agreements impact on the Government's efforts to make housing and development more affordable,” Ms Keneally said.

“We'll continue to work with the housing industry and with councils to see what can be done to make houses more affordable, make land available more quickly, and ensure a fair level of contribution.”

### **3.1 What are the criteria that will be used by IPART to evaluate contributions plans?**

When undertaking its evaluation of contributions plans, IPART will assess whether:

1. the public amenities and public services in the plan are on the essential works list as identified within this Practice Note
2. the proposed public amenities and public services are reasonable in terms of nexus (the connection between development and the demand created)
3. the proposed development contribution is based on a reasonable estimate of the cost of the proposed public amenities and public services
4. the proposed public amenities and public services can be provided within a reasonable timeframe
5. the proposed development contribution is based on a reasonable apportionment between:
  - existing demand and new demand for the public amenities and public services, and
  - different types of development that generate new demand for the public amenities and public services (e.g. between different types of residential development such as detached dwellings and multi-unit dwellings, and between different land uses such as residential, commercial and industrial).
6. the council has conducted appropriate community liaison and publicity in preparing the contributions plan
7. the plan complies with other matters IPART considers relevant.

**Attachment A** provides a detailed list of matters that IPART may consider when making its assessment against each criterion.

### **3.2 Essential works list**

The following public amenities or public services are considered essential works:

- land for open space (for example, parks and sporting facilities) including base level embellishment
- land for community services (for example, childcare centres and libraries)

- land and facilities for transport (for example, road works, traffic management and pedestrian and cyclist facilities), but not including carparking
- land and facilities for stormwater management
- the costs of plan preparation and administration.

The essential works list is relevant only to those contributions plans that propose a contribution level above the relevant cap (unless otherwise directed by the Minister for Planning).

The essential works list does not apply to contributions plans currently below the relevant cap or to those contributions plans that are exempted from the relevant cap.

### **Base level embellishment**

Base level embellishment of open space is considered to be those works required to bring the open space up to a level where the site is secure and suitable for passive or active recreation. This may include:

- site regrading
- utilities servicing
- basic landscaping (turfing, asphalt\* and other synthetic playing surfaces planting, paths)
- drainage and irrigation
- basic park structures and equipment (park furniture, toilet facilities and change rooms, shade structures and play equipment)
- security lighting and local sports field floodlighting
- sports fields, tennis courts, netball courts, basketball courts (outdoor only), but does not include skate parks, BMX tracks and the like.

\*Note: 'asphalt' (under 'basic landscaping') includes at-grade carparks to the extent that they service the recreation area only and does not include multi-storey carparks.

### **Community services**

For the purposes of these Practice Notes, 'community services' means a building or place:

owned or controlled by a public authority or non-profit community organisation, and

used for the physical, social, cultural or intellectual development or welfare of the community,

but does not include an educational establishment, hospital, retail premises, place of public worship or residential accommodation.

These may include (but are not limited to):

- community centres/halls

- libraries
- neighbourhood centres
- youth centres
- aged persons facilities (Senior Citizens centres, Home and Community Care centres)
- childcare facilities
- public art gallery
- performing arts centres.

### Plan administration

Plan administration costs are those costs directly associated with the preparation and administration of the contributions plan. These costs represent the costs to a council of project managing the plan in much the same way as the project management costs that are incorporated into the cost estimates for individual infrastructure items within a plan.

Plan administration costs may include:

- background studies, concept plans and cost estimates that are required to prepare the plan
- project management costs for preparing and implementing the plan (e.g. the employment of someone to co-ordinate the plan).

Note: Plan administration costs include only those costs that relate directly and solely to the preparation and implementation of the plan and do not include costs that would otherwise be considered part of council's key responsibilities such as core strategic planning responsibilities.

### Environmental works

The acquisition of land and the undertaking of works for environmental purposes e.g. bushland regeneration or riparian corridors are **not** defined as essential works for the purposes of this Practice Note.

The only exception to this is where it can be demonstrated that the land and/or works in question serve a dual purpose with one or more of the categories of works that meet the definition of essential infrastructure outlined above. In this situation, only the component of land and/or works that serves the dual purpose can be considered as essential works.

14<sup>th</sup> April 2020

The Hon. Alan Tudge MP  
Minister for Population, Cities and Urban Infrastructure  
Acting Minister for Immigration  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

**Re: Supporting humanitarian entrants and asylum seekers**

Dear Minister,

On the 3<sup>rd</sup> March 2020 WSROC requested (via email) an opportunity to discuss acute and longer-term challenges experienced by Fairfield City Council specifically and Western Sydney councils more generally as a consequence of recent refugee re-settlement initiatives.

We have discussed the topic with Minister Geoff Lee of the NSW Government and have subsequently updated the Ministerial Brief (copy attached) previously sent to you.

The Brief details specific issues on which we seek engagement with the Commonwealth Government. In summary we believe that revisiting the National Settlement Framework so that:

- The extent of local governments' contribution to social and cultural outcomes is acknowledged, and their involvement in planning and policy is increased;
- Local Government Areas where the sheer concentration of re-settlements produce acute social and economic challenges are acknowledged, and mechanisms exist for timely interventions especially in supporting local government; and
- Better flows of information, easier access to data, and advanced notice of Commonwealth Government initiatives results in more effective planning of infrastructure and delivery of local services.

We look forward to an opportunity to discuss the topic in more detail.

Yours sincerely,



Clr Barry Calvert  
President

# MINISTERIAL BRIEF - Commonwealth Government

## Supporting humanitarian entrants and asylum seekers

### Background:

Over the last five years, Australia has seen a significant increase in the number of humanitarian entrants<sup>1</sup> due to increase in Australia's annual humanitarian entrant intake quota focusing in particular on refugees from Syria and Iraq. NSW settles about a third of all humanitarian entrants who come to Australia with about 80% settling in Western Sydney with Fairfield, Liverpool, Blacktown and Cumberland<sup>2</sup> LGA's receiving the largest proportion (Table 1).

Table 1. Annual number of humanitarian entrants by LGA (2010 – 2019)

	2010	2011	2012	2013	2014	2015	Total	Ave.	% of NSW
Blacktown	434	443	356	393	328	279	2233	372	8
Holroyd	266	387	371	174	210	109	1517	253	6
Parramatta	330	428	505	248	234	148	1893	316	7
Liverpool	372	759	467	876	615	490	3579	597	13
Fairfield	539	933	809	1741	1462	1302	6786	1131	25
<b>Total</b>	<b>1941</b>	<b>2950</b>	<b>2508</b>	<b>3432</b>	<b>2849</b>	<b>2328</b>	<b>28930</b>		
	2016	2017	2018	2019			Total	AvE.	% of NSW
Blacktown	416	403	201	392			1412	353	5
Holroyd	249	209	150	195			803	200	3
Parramatta	319	278	146	224			967	242	3
Liverpool	1539	1043	601	1047			4230	1058	15
Fairfield	5093	2801	1728	3163			12785	3196	45
<b>Total</b>	<b>7616</b>	<b>4734</b>	<b>2826</b>	<b>5021</b>			<b>20197</b>		

\*Note: Figures are approximate as Federal Settlement Data has not been updated to reflect post-amalgamation LGA boundaries. Further, it is noted that not all refugees come through the humanitarian scheme.

It should be noted that the figures above only account for those entering Australia via the humanitarian entrant program. Many refugees do not enter Australia via this program. For example, the number of new migrants in Cumberland over this same period is approximately 24,000. In addition, councils do not have access to data on temporary and bridging visas so

<sup>1</sup> People who are resettled in Australia under the Humanitarian Program are referred to as 'humanitarian entrants'. The Humanitarian Program helps people who are subject to persecution or substantial discrimination amounting to gross violation of their human rights in their home countries and have fled their home country. <https://immi.homeaffairs.gov.au/settling-in-australia/humanitarian-settlement-program/settlement-services-for-humanitarian-entrants>

<sup>2</sup> Holroyd is presented in Table 1 because statistics for Cumberland are unavailable. Cumberland staff spend considerable time seeking to estimate figures based on the former LGAs of Auburn, Holroyd and Parramatta.

cannot estimate the number of asylum seekers entering their LGA, however anecdotally the number of people on temporary bridging visas is significant.

Regardless of the measure used, Fairfield City Council takes in a particularly high proportion of the settlement burden. Of approximately 30,000 humanitarian entrants who settled in NSW between 1 January 2016 and 31 December 2019, 12,000 have settled in the Fairfield LGA; three times more than the number of humanitarian entrants Fairfield LGA would settle in an average year. What's more, recent data acquired from Centrelink indicates that during this period, an additional 9,000 people moved to Fairfield 12 months after their initial settlement in Australia. This has had a number of impacts on the local area including:

- Increased demand for settlement services in the local area.
- Increased demand for rental housing, and an increase in overcrowding.
- Greater demand for employment opportunities in areas with limited employment.
- Greater requirements of local councils in coordinating and funding local initiatives.

This influx of new residents also creates broader, cumulative pressure on non-settlement related infrastructure and services, for example:

- Increased demand for state level services such as public transport, medical services and education.
- Increased demand for council infrastructure and services such as libraries, leisure and aquatic centres, childcare, playgrounds and parking.

Despite almost \$1 billion dollars being allocated by both state and federal governments to support the initial settlement of humanitarian entrants from Iraq and Syria, little of this funding was allocated to local government. Councils must be recognised for, and supported in, the role they play in the settlement of humanitarian migrants to Australia.

Councils can be better supported in their settlement role by:

**1. Acknowledging and supporting the role local governments play in migrant settlement and community cohesion.**

- Councils play a far greater, more complex and hands-on role than suggested in the National Settlement Strategy and seek a seat at the table in planning, policy and evaluation of current settlement programs.
- In particular, councils' role as a coordinator and facilitator of discussions and activity between migrants, local community groups, charities and settlement services should be recognised.

- For those councils experiencing disproportionate levels of refugee settlement greater financial and resource support is required to ensure positive settlement outcomes e.g. a dedicated settlement coordination officer based within council.

## **2. Providing timely access to more nuanced settlement data so councils can better perform their public role.**

- The data currently provided by Department of Home Affairs is not provided in a timely manner, nor is it nuanced enough to allow adequate planning of community services. Useful information could include but is not limited to: household size (est. housing pressures/stock availability), level of education, level of English proficiency.
- Where the above data is provided, it is not delivered at the correct geographical scale. LGA or suburb-level data is essential for council use.
- Councils do not currently have access to data on temporary and bridging visas so cannot estimate the number of asylum seekers entering their LGA.
- DFAT has not yet updated Settlement Data to reflect the post-amalgamation boundaries. This poses major challenges to Cumberland and Parramatta Councils who can only estimate settlement numbers as their current boundaries are a mix of multiple former LGAs.
- Councils have sought additional data from other government agencies e.g. Centrelink, but they have been charged significant data fees that makes this unfeasible.
- Streamlined access to various government data sets would vastly increase the efficient use of local government resources by reducing time spent chasing and interpreting data, and ensuring limited resources are spent in the most beneficial way – this includes both ease of access and ensuring geographical classification of data is consistent.

## **3. Supporting improved community infrastructure and services to those LGAs experiencing high levels of humanitarian in-migration.**

- Settlement services receive the vast proportion of federal funding. However, large concentrations of new migrants put pressure on general infrastructure and services including: childcare, libraries, recreation facilities, parking, waste services (particularly where issues of overcrowding are present). Consideration needs to be given to these broader impacts.

## **4. Delivery of a basic safety net that allows people to support themselves whilst awaiting their claim for asylum and rebuild their lives following determination.**



- In the time since the restrictions on SRSS were enacted, there has been a significant increase in homelessness in Western Sydney. While this cannot be directly attributed to the SRSS program, it is a strong indicator of the growing financial pressure on society's most vulnerable.
- Winding back of basic support payments such as SRSS, not only places individuals at risk, but imposes substantial demands on the resources of state and local governments, local communities and charities who are left to fill the gap.

## **5. Supporting refugee and asylum seekers through the Covid-19 pandemic:**

The need for basic support is particularly evident during the Covid-19 pandemic.

- Asylum seekers and migrants on temporary visas cannot access support afforded to the broader population, and in many cases cannot return home.
- These groups are at increased risk of living in dangerously overcrowded dwellings (increasing household tensions) and becoming homeless – in both cases, their risk of contracting and transmitting Covid-19 is increased.
- Those who have previously relied on public services (e.g. council libraries) for access to the internet for education and other services no longer have this option due to closures. Councils have noted a particular concern for children who have limited internet access and may be living in overcrowded dwellings.

**For further information please contact WSROC CEO, Charles Casuscelli on [REDACTED] or [info@wsroc.com.au](mailto:info@wsroc.com.au)**