



Independent Pricing and Regulatory Tribunal

Canterbury City Council's application for a special variation for 2014/15

under section 508A of *Local Government Act 1993*

Local Government — Determination
June 2014



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1 Determination

The Independent Pricing and Regulatory Tribunal of NSW (IPART) is responsible for setting the amount by which councils may increase their general income, which mainly comprises rates income. Each year, we determine a standard increase that applies to all NSW councils, based on our assessment of the annual change in their costs and other factors. This increase is known as the rate peg.

Councils may apply to us for a special variation that allows them to increase their general income by more than the rate peg. We are required to assess these applications against criteria in the Guidelines set by the Office of Local Government (OLG),¹ and may allow special variations under either section 508A or 508(2) of the *Local Government Act 1993* (the Act).

Canterbury City Council applied for a multi-year special variation from 2014/15, under section 508A. The council requested annual increases of 7.50% over the next 3 years, or a cumulative increase of 24.23% by 2016/17.

After assessing its application, we decided to approve the variation as requested. We made this decision under section 508A of the Act.

Box 1.1 The Guidelines for 2014/15

We assess applications for special variations using criteria in the *Guidelines for the preparation of an application for a special variation to general income*, issued by the Office of Local Government.

The OLG issued new Guidelines in September 2013. These Guidelines adopt the same criteria for applications for a special variation under either section 508A or 508(2) of the *Local Government Act 1993*.

The Guidelines emphasise the importance of the council's Integrated Planning and Reporting (IP&R) documents to the special variation process. Councils are expected to engage with the community about service levels and funding when preparing their strategic planning documents. As a result, for most criteria, the IP&R documents (eg, Delivery Program and Long Term Financial Plan) must contain evidence that supports a council's application for a special variation.

¹ Division of Local Government, Department of Premier and Cabinet, *Guidelines for the preparation of an application for a special variation to general income for 2014/15*, September 2013 (the Guidelines). Effective February 2014 the Division of Local Government became known as the Office of Local Government.

1.1 Our decision

We determined that Canterbury City Council may increase its general income by the annual percentages shown in Table 1.1. The annual increases incorporate the rate peg to which the council would otherwise be entitled (2.3% in 2014/15 and an assumed 3.0% in each of the following years). The cumulative increase of 24.23% is 15.73% more than the rate peg over these years.

After the last year of the special variation (2016/17), the increase will remain permanently in the council's rate base.

The annual increases in the dollar amounts reflect the percentage increases we have approved and any adjustments to the council's general income that occur as a result of various catch-up and valuation adjustments and the expiry of an existing special variation.

Table 1.1 IPART's determination on Canterbury City Council's special variation for 2014/15 to 2016/17

Year	Increase approved (%)	Cumulative increase approved (%)	Annual increase in general income (\$)	Permissible general income (\$)
Adjusted notional income 30 June 2014				54,814,868
2014/15	7.50	7.50	4,133,046	58,947,915
2015/16	7.50	15.56	4,421,093	63,369,008
2016/17	7.50	24.23	4,752,676	68,121,684

Source: Canterbury City Council Application Part A Worksheets 1 and 6.

We have attached conditions to this decision, including that the council use the income raised through the special variation for purposes consistent with those set out in its application. Box 1.2 lists these conditions.

Box 1.2 Conditions attached to the approved special variation

IPART's approval of Canterbury City Council's application for a special variation over the period from 2014/15 to 2016/17 is subject to the following conditions:

- ▼ The council uses the additional income from the special variation for the purposes of improving its financial sustainability and funding the program of expenditure outlined in the council's application and listed in Appendix A.
 - ▼ The council reports in its annual report for each year from 2014/15 to 2023/24 on:
 - the actual revenues, expenses and operating balance against the projected revenues, expenses and operating balance, as outlined in the Long Term Financial Plan provided in the council's application, and summarised in Appendix B
 - any significant variations from its proposed expenditure as forecast in the current Long Term Financial Plan and any corrective action taken or to be taken to address any such variation
 - expenditure consistent with the council's application and listed in Appendix A, and the reasons for any significant differences from the proposed expenditure
 - the outcomes achieved as a result of the actual program of expenditure.
 - ▼ The council reports to the Office of Local Government by 30 November each year on its compliance with these conditions.
-

2 What did the council request and why?

Canterbury City Council applied to increase its general income by a cumulative 24.23% over the 3-year period from 2014/15 to 2016/17, and to permanently incorporate this increase into its general income base.

The council estimated that if its requested special variation is approved, its permissible general income will increase from \$54.8m in 2013/14 to \$68.1m in 2016/17. This will generate additional revenue of \$17.0m over 3 years above the rate peg increase.

The council intends to use the additional revenue above the rate peg to improve its financial sustainability and to fund debt servicing costs associated with a capital works program.

During the 3-year special variation period, the council will spend

- ▼ \$2.3m on infrastructure renewals
- ▼ \$4.3m on servicing borrowing costs
- ▼ \$1.5m on loan repayments

- ▼ \$8.1m on materials and contracts expenses.²

Over 10 years, the special variation will generate \$85m above the rate peg. The council will allocate funds as follows:

- ▼ \$14.8m on infrastructure renewals (part of a \$53.5m program also funded by \$38.7m in borrowings)
- ▼ \$18.2m on borrowing costs
- ▼ \$6.1m on loan repayments
- ▼ \$40.9m on materials and contracts expenses.³

More detail on the council's proposed program of expenditure to 2023/24 is provided in Appendices A and B.

3 How did we reach our decision?

We assessed Canterbury City Council's application against the criteria in the Guidelines. In making our assessment we also considered the council's most recent IP&R documents, which support its application, as well as a range of comparative data about the council, set out in Appendix C.

Canterbury City Council has applied on the basis of its adopted IP&R documents, in particular its Delivery Program, Long Term Financial Plan (LTFP) and Asset Management Plan (AMP).

The rate increases for which the council has applied are significant, and we carefully considered, among other things, the council's need for the increase, its consideration of the community's priorities and capacity and willingness to pay, and the impact of the rate increase on ratepayers.

On balance, we found that the application met the criteria. In particular, we found that:

1. the need for the proposed revenue is demonstrated in the council's IP&R documents, and reflects community priorities
2. the council provided evidence that the community is aware of the need for and extent of the rate rise, and that it had considered the community's capacity and willingness to pay the proposed rate rises
3. the impact of the proposed rate rises on ratepayers is significant though reasonable given the purpose of the special variation and that the council has taken account of ratepayers' willingness and capacity to pay

² Canterbury City Council, *Special Variation Application 2014/15 - Part A* (Canterbury City Council Application Part A), Worksheet 6.

³ Canterbury City Council Application Part A, Worksheet 6.

4. the council made realistic assumptions concerning its projected service delivery and budget
5. the council reported productivity savings in past years, and indicated its intention to realise further savings during the period of the special variation.

Table 3.1 summarises our assessment against the criteria.

Table 3.1 Summary of IPART’s assessment against criteria in the Guidelines

Criterion	IPART findings
<p>1. Need for and purpose of the special variation must be clearly articulated in the council’s IP&R documents. Evidence could include community need/desire for service levels/projects and limited council resourcing alternatives, and the assessment of the council’s financial sustainability made by the NSW Treasury Corporation (TCorp). The LTFP must include scenarios both with and without the special variation.</p>	<p>The special variation is consistent with the council’s IP&R documents. Maintaining roads and footpaths as well as the level of services to the community were identified as community priorities.</p> <p>The council has an operating deficit of 4.1% and has projected an operating deficit of 2.1% by 2023/24 without the special variation.^a The council identified the need to reduce operating deficits and to increase asset renewals.</p> <p>TCorp identified ongoing operating deficits and a growing asset backlog as issues for the council.^b</p>
<p>2. Evidence that the community is aware of the need for, and the extent of, the proposed rate rises. The IP&R documents should clearly explain the rate rise, canvas alternatives to the rate rise, the impact of any rises on the community, and the council’s consideration of community capacity and willingness to pay higher rates. The council should demonstrate use of an appropriate variety of engagement methods to raise community awareness and provide opportunities for input.</p>	<p>The council conducted a range of activities to inform and engage with its community. These included mail outs, presentations to stakeholder groups and a community focus group, social media and other online resources including a website inviting community feedback.^c The council received 20 submissions which raised a range of issues including efficiency, the quality of services and emphasising impact on ratepayers. The consultation materials accurately convey the purpose and size of the proposed rate variations.</p>
<p>3. Impact on affected ratepayers must be reasonable, having regard to current rate levels, existing ratepayer base and the proposed purpose of the variation. The council’s IP&R process should establish that proposed rate rises are affordable, having regard to the community’s capacity to pay.</p>	<p>The special variation will have a significant impact on ratepayers, but given the need for additional revenue to reduce operating deficits and maintain infrastructure, it is reasonable. Canterbury City Council is a relatively low socio-economic area with a SEIFA ranking of 51/153 and annual household income in 2011/12 of \$40,629 compared to the Group 3 average of \$52,899.^d Residential rates as a proportion of household income are also 2.1% above the Group 3 and NSW averages of 1.6%. However, the council’s outstanding rates ratio is only 4.1%, which is within benchmark levels.^e The council also has a hardship policy to assist affected ratepayers and pensioners and plans to use loans to reduce the impact on ratepayers.</p>
<p>4. Delivery Program and LTFP must show evidence of realistic assumptions.</p>	<p>The council’s LTFP and delivery program contain realistic assumptions regarding funding sources. The council assumes a zero growth rate in assessments, based on very low growth over the past 10 years. The council also assumed a 2.9% rate peg in future years, which is lower than our preferred assumption of 3%, but within the council’s analysis of past and future trends.</p>

Criterion	IPART findings
5. Productivity improvements and cost containment strategies realised in past years must be explained, as well as plans to realise savings over the proposed special variation period.	The council has provided an extensive list of service cuts, efficiencies and cost containment it has realised in recent years. These include staff cuts of over 200 FTEs, as well as ongoing annual savings of \$0.5m. The council has projected future service cuts and efficiencies estimated at \$3m over the next 3 years, as well as \$1.0m in annual savings. ^f

^a Canterbury City Council, Application Part B, Long Term Financial Plan, Attachments & IPART Calculations.

^b New South Wales Treasury Corporation, *Canterbury City Council, Financial Assessment, Sustainability and Benchmarking Report*, 12 March 2013 (TCorp Report), p 4.

^c Canterbury City Council, Application Part B, pp 23-26.

^d OLG, unpublished data.

^e OLG, unpublished data.

^f Canterbury City Council Application Part B, p 46.

The sections below discuss our findings for some criteria in more detail.

3.1 Need for and purpose of the special variation

The council's IP&R documents support the need for the special variation. The council has forecast continuing operating deficits, increasing asset backlogs and infrastructure requirements. It has also identified additional costs required to maintain the level of service to the community.

NSW Treasury Corporation (TCorp) observed that the council's current financial position was 'moderate', but it considered its outlook to be 'negative'.⁴ TCorp identified growing asset backlogs and low liquidity as a concern for the council. TCorp also considered that this would affect the council's ability to service current liabilities.⁵

Whilst the council's asset renewals ratio is close to benchmark at 98%, its maintenance expenditure is estimated to be only 18% of annual requirements.⁶ Maintenance expenditure as a percentage of operating expenditure is only 3.8% compared to the Group 3 average of 10.1% and NSW average of 11.1%.⁷

⁴ New South Wales Treasury Corporation, *Financial Sustainability of the New South Wales Local Government Sector*, April 2013, pp 17-18.

⁵ New South Wales Treasury Corporation, *Canterbury City Council, Financial Assessment, Sustainability and Benchmarking Report*, 12 March 2013 (TCorp Report), p 4.

⁶ OLG, unpublished data.

⁷ OLG, unpublished data.

The council intends to use the special variation funds to improve its operating deficit (currently 4.1%) from a forecast 2.1% without the special variation in 2023/24, to a modest surplus of 0.9% with the special variation. Under its base case, the council would reduce service levels by closing several libraries and one of its aquatic centres. With the special variation, these would remain open.⁸ The council has maintained low levels of debt in the past, but it has proposed additional borrowings of \$38.7m which will be used to fund infrastructure renewals over the 3-year period.⁹

3.2 Reasonable impact on ratepayers

We consider that the impact of the special variation will be significant because Canterbury is a low socio-economic area.

- ▼ the council has a SEIFA ranking of 51/153
- ▼ average annual household income in 2011/12 was \$40,629 compared to the Group 3 average of \$52,899 and the NSW average of \$44,140
- ▼ residential rates a percentage of household income are 2.1% compared to the Group 3 and NSW averages of 1.6%.

Our assessment of impact on ratepayers

In assessing the reasonableness of the impact of the special variation on ratepayers, we examined the council's special variation history.

We found that since 2000/01 the council has been granted 2 special variations:

- ▼ 6.92% in 2001/02 – temporary s508(2) for 3 years
- ▼ 11.13% in 2004/05 – temporary s508(2) for 15 years.

Historically, the council has had high residential rates. Average residential rates in 2011/12 were \$860, compared to the Group 3 average of \$790 and NSW average of \$685.¹⁰

The council has applied for an average residential rate increase of \$231.05 over 3 years and an average business rate increase of \$1,015.75 over 3 years.¹¹

⁸ Canterbury City Council, Application Part B, p 9.

⁹ Canterbury City Council, Application Part A, Worksheet 6.

¹⁰ OLG, unpublished data.

¹¹ Canterbury City Council Application Part A, Worksheet 5a.

We note that while the rate increases are high, they are reasonable given the need for the variation. The special variation is required to bring the council's operating balance into surplus and to ensure adequate asset maintenance and renewals. It is also consistent with the community priorities to maintain service levels, identified in the community strategic plan and through consultation on the special variation. The council has also used debt to partly fund expenditure to reduce the impact on ratepayers.

4 What does our decision mean for the council?

Our decision means that Canterbury City Council may increase its general income over the 3-year period from \$54.81m in 2013/14 to \$68.12m in 2016/17 (see Table 1.1). After 2016/17, all other things being equal, the council's permissible general income will increase by the annual rate peg unless we approve a further special variation.¹²

The council estimates that over these 3 years, the additional rates revenue will accumulate to \$17.0m above the rate peg.¹³ This extra income is what the council requested, allowing it to eliminate its operating deficit while maintaining the level of services and assets its community expects.

5 What does our decision mean for ratepayers?

We set the allowable increase in general income, but it is a matter for each individual council to determine how it allocates any increase across different categories of ratepayer, consistent with our determination.

In its application, Canterbury City Council indicated that it intended to increase rates over the 3 years uniformly for each category.

The council has calculated that over 3 years:

- ▼ Average residential rates (currently \$953.65) will increase by a cumulative 24.23%, or by \$231.05.
- ▼ Average business rates (currently \$4,187.55) will increase by a cumulative 24.26%, or by \$1,015.75.¹⁴

¹² General income in future years cannot be determined with precision because it will be influenced by several factors apart from the rate peg. Those factors include changes in the number of rateable properties and adjustments for previous under- or over-collection of rates. The DLG is responsible for monitoring and ensuring compliance.

¹³ Canterbury City Council Application Part A Worksheet 1 and IPART calculations.

¹⁴ Canterbury City Council Application Part A, Worksheet 5a.

Table 5.1 shows how much average rates are expected to increase in each main ratepayer category. The actual impact of our determination on rates is a matter for the council to decide.

Table 5.1 Indicative annual increases in average rates as a result of the determination

Year	Residential		Business	
	%	\$	%	\$
2014/15	7.50	71.50	7.52	315.00
2015/16	7.50	76.90	7.50	337.70
2016/17	7.50	82.65	7.50	363.05

Source: Canterbury City Council, Application Part A, Worksheet 5a and IPART calculations.



Appendices

A Expenditures to be funded from the special variation above the rate peg

Tables A.1 and A.2 show Canterbury City Council's proposed expenditure of the special variation funds over the next 10 years.

The council will use the additional special variation revenue of \$85.0m over 10 years to fund:

- ▼ \$14.8m on infrastructure renewals (part of a \$53.5m program also funded by \$38.7m in borrowings)
- ▼ \$18.2m on borrowing costs
- ▼ \$6.1m on loan repayments
- ▼ \$40.9m on materials and contracts expenses.¹⁵

The additional funds will contribute \$25.9m towards improving the council's operating balance over the 10 years (Table A.1).

The council will indicate in its Annual Reports how its actual expenditure has evolved relative to its proposed program of expenditure.

¹⁵ Canterbury City Council, Application Part A, Worksheet 6.

Table A.1 Income and proposed expenditure related to the special variation (\$000)

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total
Special variation income above rate peg	2,850	5,589	8,608	8,866	9,132	9,406	9,688	9,979	10,278	10,587	84,982
Funding for increased operating expenditures											
- Borrowing costs	730	1,440	2,131	2,100	2,067	2,032	1,995	1,996	1,914	1,870	18,237
- Materials and contracts	1,305	2,688	4,152	4,277	4,405	4,537	4,674	4,814	4,958	5,107	40,916
Effect of funds on reducing operating deficits	815	1,460	2,324	2,488	2,659	2,836	3,019	3,209	3,405	3,609	25,824
Funding for capital expenditure	196	557	1,583	1,630	1,679	1,729	1,781	1,834	1,889	1,946	14,826

Source: Canterbury City Council Application Part A, Worksheet 6.

Table A.2 Proposed capital program related to the special variation (\$000)

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	Total
Asset infrastructure renewal											
- Buildings	1,896	2,006	2,216	243	250	258	265	273	281	290	7,978
- Footpaths	463	490	542	59	61	63	65	67	69	71	1,950
- Parks and Reserves	5,152	5,450	6,022	660	680	700	721	743	765	788	21,680
- Stormwater	533	564	623	68	70	72	75	77	79	82	2,243
- Transport (roads, kerb and gutter, traffic devices, bridges)	4,683	4,955	5,475	600	618	636	656	675	695	716	19,709
Total	12,728	13,464	14,878	1,630	1,679	1,729	1,781	1,835	1,890	1,947	53,561

Source: Canterbury City Council Application Part A, Worksheet 6.

B Canterbury City Council's projected revenue, expenses and operating balance

The council will also report annually against its projected revenue, expenses and operating result as classified in its Annual Financial Statements and shown in Table B.1.

Revenues and the operating result in the annual accounts are reported inclusive of capital grants and contributions and asset sales.

In order to isolate ongoing trends in operating revenues and expenses, our analysis of the council's operating account in the body of this report excluded all items of a capital nature. When they are included in the council's public reports, total revenue will be higher and the operating deficit lower (or the operating surplus higher).

Table B.1 Summary of projected operating statement for Canterbury City Council, 2014/15 to 2023/24 (\$000) – provided in 2013/14 dollars

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Total revenue	104,003	106,633	106,633	109,574	109,765	109,957	110,152	110,153	110,153	110,153
Total expenses	101,795	100,138	98,479	98,651	98,820	98,988	99,171	99,378	99,605	99,848
Operating result from continuing operations	-308	1,348	3,008	2,836	2,667	2,499	2,316	2,109	1,882	1,639
Operating result from continuing operations (excluding grants and contributions for capital purposes)	-3,968	-2,312	652	-824	-993	-1,161	-1,344	-1,551	-1,778	-2,021
Operating result from continuing operations (excluding grants and contributions for capital purposes)	-4.1%	-2.4%	-0.7%	-0.8%	-1.0%	-1.2%	-1.4%	-1.6%	-1.8%	-2.1%

Source: Canterbury City Council, *Long Term Financial Plan 2014-15 - 2023-24*.

C Comparative indicators

Indicators of council performance may be considered across time, either for one council or across similar councils, or by comparing similar councils at a point in time.

In Table C.1 we show how selected indicators for Canterbury City Council have changed over the 3 years to 2011/12.

The council has reduced its FTE number in the last 3 years (550 down to 531), whilst improving the ratio of population to FTE from 260 in 2009/10 to 273 in 2011/12. Consistent with this, the council's employee costs as a percentage of operating expenditure have decreased from 48.5% in 2009/10 to 46.1% in 2011/12. The council's average costs per FTE in 2011/12 increased to \$82,522 however this is due to a one-off 'Employee Entitlement Discounting' expense incurred in that year, which increased the level of total Employee Costs used in the calculation.

Table C.1 Trends in selected indicators for Canterbury City Council, 2009/10 to 2011/12

	2009/10	2010/11	2011/12
Productivity (labour input) indicators^a			
FTE staff (number)	550	539	531
Ratio of population to FTE	260	266	273
Average cost per FTE (\$)	\$75,575	\$75,473	\$82,522
Employee costs as % operating expenditure (General Fund only) (%)	48.5	45.4	46.1
Consultancy/contractor expenses (\$m)	14.3	0.0 ^b	18.2
Consultancy/contractor expenses as % operating expenditure (%)	16.7	0.0 ^b	19.2

^a Based upon total council operations that include General Fund, Water & Sewer and other funds, if applicable.

^b No data supplied for this year.

Source: DLG, unpublished data.

In Table C.2 we compare the latest selected published data on Canterbury City Council with the average of the councils in the OLG Group and with NSW councils as a whole.

Table C.2 Select comparative indicators for Canterbury City Council, 2011/12

	Council	DLG Group 3 average ^a	NSW average
General profile			
Area (km ²)	34	n/a	n/a
Population	144,751	n/a	n/a
General Fund operating expenditure (\$m)	95.0	n/a	n/a
General Fund operating revenue per capita (\$)	643	847	2,011
Rates revenue as % General Fund income (%)	65.5	55.4	45.7
Average ordinary rate indicators^b			
Average rate – residential (\$)	860	790	685
Average rate – business (\$)	3,750	4,935	2,552
Socio-economic/capacity to pay indicators^c			
Average annual income for individuals, 2010 (\$)	40,629	52,899	44,140
Growth in average annual income, 2006-2010 (% pa)	3.1	3.1	3.0
Average residential rates 2011/12/ average annual income, 2010 (%)	2.1	1.6	1.6
SEIFA, 2011 (NSW rank; 153 is least disadvantaged)	51	n/a	n/a
Outstanding rates & annual charges ratio (incl water & sewerage charges) (%)	4.1	3.3	7.0
Productivity (labour input) indicators^d			
FTE staff (number)	531	571	293
Ratio of population to FTE	273	247	126
Average cost per FTE (\$)	82,522	85,525	74,438
Employee costs as % operating expenditure (General Fund only) (%)	46.1	41.6	36.8
Consultancy/contractor expenses (\$m)	18.2	16.0	6.9
Consultancy/contractor expenses as % operating expenditure (%)	19.2	14.9	9.3

^a OLG Group 3 is classified 'Urban Large/Very Large Metropolitan Developed with a population over 70,000.' The group comprises 17 councils including Bankstown City Council, Blacktown City Council, Holroyd City Council, Parramatta City Council and Ryde City Council.

^b Average rates equal total ordinary rates revenue divided by the number of assessments in each category.

^c Average annual income includes income from all sources excluding government pensions and allowances.

^d Based upon total council operations. There are difficulties in comparing councils using this data because councils' activities differ widely in scope and they may be defined and measured differently between councils.

Source: OLG, unpublished data; ABS, *National Regional Profiles, NSW*, November 2011; ABS, *Regional Population Growth*, July 2012; ABS, *Estimates of Personal Income for Small Areas, 2005-06 to 2009-10*, February 2013, ABS, *Socio-Economic Indexes for Areas (SEIFA) 2011*, March 2013.