

Dear Sirs,

Re: Review of Rental for Domestic Waterfront Tenancies in NSW (ref: 03/358)

We wish to register strong objections to the proposed review on jetty licences and price increases on the following basis:

1. Public allowed to traverse licenced area – no exclusivity as adjacent property.
2. Most adjoining landowners already pay Land Tax on their properties because of the added value of the licenced area – this is double taxation.
3. The Landlord of the licenced area has a monopoly – non competitive situation.
4. Most waterfront facilities do not have vehicular access like the properties the valuation is being equated to.
5. There is no depth consideration on berthing areas – those berths that are affected by tidal access pay same rent as those unaffected.
6. Structures are maintained by licensee.
7. Structures on licenced areas are paid for by licensee.
8. Licenced area is not Freehold therefore no potential capital gain.
9. Licence is at the sole discretion of The Minister – no avenue of appeal.

Yours faithfully

G. T. LINGARD