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Submission: Thank you for the opportunity to provide comment on:

- IPART's proposed approach to the review of prices for land valuation services provided by the Valuer General to councils
- The proposal submitted by the Valuer General dated 30 November 2018.

In regard to IPART's proposed approach to its review, it is our view that the approach is transparent and comprehensive, and allows for stakeholder input. It is expected that IPART will consider stakeholders input and reflects this in its Draft Report on the review. At this stage, we have no further comments in regard to the IPART issues paper dated October 2018.

In regard to Valuer General proposal dated 30 November 2018, at this stage we do have some concern in regard to the proposed allocation of costs amongst the four geographical regions, given the significant variation between the minimum and maximum fee proposed. We also wish to reserve the right to provide comment when IPART has completed its review, including the consideration of stakeholder input, in particular from those Councils who may be effected adversely if the Valuer General's proposed allocation is implemented.

In concluding, at this stage we are not in a position to provide any further comments. IPART's issues paper does not provide a set position and at this stage we only have the Valuer General's proposal to consider. It is our view we will be better placed to provide comment on IPART's Draft Report when issued later in 2019. It is anticipated this report will critically analyse the Valuer General's proposal as well as take into account stakeholder input.

We look forward to IPART's release of it Draft Report in early April 2019.