

Review of the Local Government Rating System: Draft Report

Submission to IPART

October 2016

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About NCOSS

The NSW Council of Social Service (NCOSS) works with and for people experiencing poverty and disadvantage to see positive change in our communities.

When rates of poverty and inequality are low, everyone in NSW benefits. With 80 years of knowledge and experience informing our vision, NCOSS is uniquely placed to bring together civil society to work with government and business to ensure communities in NSW are strong for everyone.

As the peak body for health and community services in NSW we support the sector to deliver innovative services that grow and evolve as needs and circumstances evolve.

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Summary of recommendations

Recommendation 1

NCOSS recommends that Local Governments continue to use Unimproved Value as the sole basis for determining residential rates, and that no allowance be made to use Capital Improved Value.

Recommendation 2

NCOSS recommends that minimum amounts be removed from the structure of local government rates.

Recommendation 3

NCOSS recommends that the Valuer-General be retained as the sole body authorised to undertake valuation services for local government rating purposes.

Recommendation 4

NCOSS recommends that a separate 'multi-residential' category be created, retaining unimproved value as a valuation method, for the purposes of determining appropriate rates for residential units and apartment properties, and that creation of this category involve further consultation to avoid unintended consequences and ensure equity and fairness.

Recommendation 5

NCOSS recommends that no amendments to the Local Government Act 1993 be made, using the term 'community of interest' as a basis for the levying of differential rates.

Recommendation 6

NCOSS recommends that IPART retain regulatory oversight over processes to determine special rate variations.

Recommendation 7

NCOSS recommends that no changes be made to the general exemptions for Public Benevolent Institutions providing social housing, unless the NSW Government supports the provision of Social housing by fully funding a rebate that offsets 100% of council rates for providers of social housing.

Recommendation 8

That the definition of 'residential activity' be drafted so as to provide explicit rate exemptions for PBIs providing services that may otherwise be captured by the broader definition of 'residential activity', including but not limited to women's refuges, homeless shelters and rehabilitation facilities that may involve continuous residence beyond 3 months.

Recommendation 9

NCOSS strongly recommends against any adoption of a rate deferral alternative.

Recommendation 10

NCOSS recommends that the current pensioner concession rebate system for local government rates be retained, with an \$80 increase of the rate rebate amount to a maximum of \$330.

Recommendation 11

NCOSS recommends that, consistent with its support of other concession rebates, the NSW Government be responsible for full cost of maintaining the pensioner concession rebate for local government rates.

Introduction

NCOSS welcomes the opportunity to provide input into the Independent Pricing and Regulatory Tribunal's (IPART) Draft Report of its Review of the Local Government Rating System.

As an organisation representing the interests of people experiencing poverty in NSW, NCOSS is particularly focused on the impacts that the Tribunal's draft recommendations would have on people with fixed and low incomes. We therefore welcome the Tribunal's nomination of equity as a fundamental principle that ought to guide the determination of local government rating policy.

NCOSS would also like to recognise the important role played by the rate peg as a cap, in helping to ensure that the overall contribution that local residents are required to make to their local infrastructure and services, is reasonable and subject to structured oversight. In the context of any proposed changes to local government rates, the rate peg will continue to be an important tool in helping to ensure equity and fairness for residents.

It is important to establish at the outset that NCOSS does not regard the value of a property as a good indicator of a ratepayer's capacity to pay. We believe that there is significant potential for the levying of rates to adversely impact those who may be considered asset rich but have low incomes. In this context, and a property market characterised by prices that are generally extremely high, NCOSS is very concerned that the Tribunal's recommendations involve assumptions of equivalence between property value and a capacity to pay.

NCOSS would also like to point out that many of the recommendations contained in the Tribunal's draft report are inter-related, and cannot necessarily be evaluated in isolation. For instance, a change to capital improved value, in conjunction with a removal of concessions, and removal of regulatory oversight of special variations, constitute a seismic change in the way that local government rates are levied. This shift could have significant and compounding impacts on residents, particularly those vulnerable people with fixed or lower incomes.

In recognition of our concern surrounding the equity of local government rates, the implications of making a range of inter-related changes and low-income ratepayers' ability to pay, this submission focuses on the following recommendations from the Tribunal regarding:

1. the use of Capital Improved Value (CIV) as an alternative to Unimproved Value (UV);
2. differential residential rates and the process for special variations;
3. eligibility for rate exemptions; and
4. alternatives to the pensioner concession rebate.

1. The use of Capital Improved Value (CIV) as an alternative to Unimproved Value (UV).

It is important to note that the system for the valuation of property in NSW based on land or unimproved value, has been reviewed many times over the last few decades and has been found to be an effective, efficient and appropriate basis of valuation for the purposes of rating and taxation. Indeed it has even been regarded as a benchmark by which other jurisdictions measure their performance.¹ Whereas a number of taxation reviews, and the Valuer-General's own submission to the Tribunal, suggest significant complications and distortions in ratings based upon CIV, dependent as they would be, upon up-to-date estimates of individual property market values.²

On the basis of the criteria for taxation set by the Tribunal in its own paper, NCOSS disagrees with the Tribunal's contention that changing from UV to CIV as a basis for rating is justified.

While Tribunal admits that CIV is less efficient, in that it is more likely to have an impact upon resident's capital investment behavior, we believe it also arguably distorts a resident's share of funding of public goods by being more closely aligned to property market value, rather than land value. NCOSS strongly disputes the contention that CIV is a better proxy for household demand for council services, than land or unimproved value. According to the Tribunal's taxation criteria CIV is also more complex and difficult to administer, as outlined by the Valuer-General in its submission to the Tribunal.³ NCOSS also argues that in linking more closely to the market price of property, rating based upon CIV would also be less sustainable due to its greater susceptibility to the movements of the NSW property market, which is a national and international outlier in its volatility and unaffordability.

More fundamentally for the people we represent, NCOSS disagrees with the Tribunal's assertion that property value is an accurate or fair proxy for wealth and capacity to pay, particularly in the context of the prevailing unaffordability of housing in NSW. While it is true to say that the current UV basis for rating does involve setting rates according to an approximation of the value of a property, a move to CIV would more closely link rates to market property prices, which are arguably less closely linked to a property's intrinsic value, and so be likely to accentuate any inherent unfairness already exhibited in the current system.

Residential property prices in NSW (and Sydney in particular) are already demonstrably unaffordable for a large and growing number of people. Average sale prices for all dwellings in Sydney were \$938,000 and \$720,000 across the whole state according to the official March quarter 2016 rent and sales figures.⁴ These numbers continue a significant trend of increases over a number of years, and have occurred to varying degrees across all residential properties in all areas of the State, including properties that are ostensibly available to those with

¹ Valuer General: Submission to IPART, Review of the Local Government Rating System, p 3-4
https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/investigation-section-9-submissions-review-of-the-local-government-rating-system/online_submission_-_office_of_the_valuer_general_-_s._gilkes_-_20_may_2016_183000000.pdf

² Ibid

³ Ibid.

⁴ Housing NSW, Rent and Sales Report: Number 116. p.10 http://www.housing.nsw.gov.au/_data/assets/file/0009/381591/1.-R-and-S-Report-116.pdf

lower incomes. Even with the overall safety net protection conferred by the rate peg, it is likely that any rating based upon CIV, would result in a widespread increase in rates, which would be particularly problematic for lower income residents.

If all properties, even those that are at the lower end of the market, are unaffordable, then a rise in property value does not necessarily confer relative wealth or benefit. Indeed when such increases in market value come with rises in mortgage, strata, rate or rent costs, then rising property prices serve only to increase the burden on households with low or fixed incomes.

Accordingly, while market prices for properties have markedly increased, there is no evidence to suggest that this has had any positive impact upon disposable wealth, or general capacity to pay, indeed there is significant evidence to suggest that the opposite is true. The number of households spending 30, 40 and 50% or more of their income on housing (including rents, mortgages, strata levies and rates) has significantly increased, and more than 50% of lower income home-owners, and over 76% of low-income renters are spending more than 30% of their income on housing.⁵

NCOSS asserts that any move to base rate determinations on CIV would see many residents, particularly the increasing number of those living in apartments, experience a significant increase in their relative rate burden, based on the assumption that being resident in a property that has increased in market value, has increased their wealth and capacity to pay. NCOSS is particularly concerned for the likely impact of these changes upon older people, people with disability, people on fixed incomes and other potentially vulnerable low-income residents.

NCOSS understands the impetus for reform of local government rates to recognise the increasing number of people resident in apartments, and ensure that there is a fair, efficient and equitable contribution to the public good provided by local governments through infrastructure and services. However, there is strong evidence to suggest that a significant proportion of people living in apartments receive low levels of income. For example, in the City of Sydney, 91.9% of low-income households live in medium or high-density dwellings.⁶ Similarly, a study commissioned by Shelter NSW found that low-income families with children are “an extremely significant sub-sector of Sydney apartment residents, and dominate the apartment market in many parts of the city”.⁷ An increasing number of these people are rental tenants who do not receive even notional benefit from rising or high property values. These people are of particular concern as they would be subject to the detrimental effects of a change to rates calculated on the basis of CIV, through the impact of the higher rents that would be likely to result.

Further, we would like to point out that the fundamental purpose of local government rates is as a tool for facilitating residents’ contribution to the cost of local government provided infrastructure and services, not to serve as a method for income redistribution based upon the estimated market value of property. We see no evidence of any correlation between increases in the market value of a property, and the residents’ call upon common infrastructure and services, which a rating system based on CIV might also implicitly suggest.

⁵ Shelter NSW: NSW Housing a Factsheet,

http://www.sheltersnsw.org.au/sites/sheltersnsw.org.au/files/public/documents/fly1603factsheet-nsw_sheltersnsw%2020160414.pdf

⁶ City of Sydney, *Community Profile*. Available at: <http://profile.id.com.au/sydney/low-income-by-dwellings>

⁷ Easthope, H., & Judd, S. (2010). *Living Well in Greater Density*. City Futures Research Centre. Sydney. P.15

Accordingly NCOSS does not support the proposed change to allow CIV to be used as a basis for local government rating. As further outlined in Section 2 we recommend that, where concessions continue to provide an appropriate safety net, the cost of providing services to residents of apartments, be dealt with by creating a separate rating category for residents of multi-unit housing. This category should be developed through further consultation to guard against unintended consequences and ensure proportionality, equity and fairness.

Recommendation 1

NCOSS recommends that Local Governments continue to use Unimproved Value as the sole basis for determining residential rates, and that no allowance be made to use Capital Improved Value.

NCOSS is supportive of the Tribunal's proposal to remove minimums from the local government rate structure. As the Tribunal points out, the problem with minimums is that all ratepayers below a certain threshold pay the same amount in rates, such that a one-bedroom apartment will often face the same rate as a three-bedroom apartment. The implementation of a separate rating category for multi-unit residences, that is comprised of an appropriately determined base amount, and that is determined according to unimproved value, should allow minimums to be removed while still protecting residents of apartments with low and fixed incomes from being unfairly burdened.

Recommendation 2

NCOSS recommends that minimum amounts be removed from the structure of local government rates.

NCOSS does not support the Tribunal's proposal to allow councils to directly buy valuation services from private valuers. In our view, the Valuer-General should retain sole authorisation to undertake valuation services for local government rating purposes. The Valuer-General provides and facilitates an experienced, consistent, well-informed, evidence-based, and perhaps most importantly, independent and arms-length valuation service.

Recommendation 3

NCOSS recommends that the Valuer-General be retained as the sole body authorised to undertake valuation services for local government rating purposes.

2. Changes to residential rating categories and variations.

NCOSS conditionally supports changes that would allow for the creation of a separate 'multi-residential' rating category, covering residents in multi-unit residences. Standalone residential properties and multi-unit residential properties do have different characteristics and requirements for support from local government infrastructure and services. Accordingly, NCOSS believes that a differentiation between residential and multi-residential rate categories would allow local governments flexibility to more appropriately set rates according to the infrastructure and service requirements involved, as was recognized in the most recent report of the Joint Standing Committee on the Office of the Valuer-General⁸.

However, NCOSS does not support the premise that multi-unit residences necessarily place a greater burden upon council infrastructure or services, and suggests that there are benefits in the scale and concentration that local governments receive from higher density residential properties. For instance, while a multi-unit residence

⁸ The Joint Standing Committee on the Office of the Valuer General: report 2/55 pp126-127

<https://www.parliament.nsw.gov.au/committees/DBAssets/InquiryReport/ReportAcrobat/5589/Land%20valuation%20system%20-%20final%20report.pdf>

may produce a greater volume of waste, it does so in a concentration that is actually more efficient to collect. Similarly, while the greater number of residents in multi-unit dwellings has implications for local government provided community services (such as libraries and other community supports), it places a significantly lesser burden on local government maintenance of footpaths, nature-strips, trees and other street maintenance, than a similar number of residents in detached houses might. We reiterate this point as we believe that the creation of any separate category for levying rates on residents of apartments, should not involve an inherent assumption that such residents of apartments necessarily represent a more significant burden on local infrastructure and services.

Recommendation 4

NCOSS recommends that a separate ‘multi-residential’ category be created, retaining unimproved value as a valuation method, for the purposes of determining appropriate rates for residential units and apartment properties, and that creation of this category involve further consultation to avoid unintended consequences and ensure equity and fairness.

We are concerned at the proposal to enable councils to determine a residential sub-category based on a different ‘community of interest’. We note the Tribunal recommends that an area should be considered to have a different ‘community of interest’ where “it has different access to, demand for, or costs of providing council services.” We are concerned that this is too ambiguous, and has the potential to empower councils to impose higher rates in those areas that need and therefore utilise a greater level of council services. While such a mechanism may have potential to enable councils to utilise value capture to contribute to the funding of things such as transport infrastructure, the terms proposed are not clearly enough defined. There is potential that the proposed changes to the Local Government Act could have unintended consequences, such as providing mechanisms for councils to levy higher rates in areas around social or affordable housing on the basis that residents of that area may be deemed by councils to have greater demand for services. Consequently, without further clarification as to the intent and limitations of this sub-category, and more targeted wording, NCOSS does not support the amendment to the Local Government Act in its current form.

Recommendation 5

NCOSS recommends that no amendments to the Local Government Act 1993 be made, using the term ‘community of interest’ as a basis for the levying of differential rates.

While NCOSS understands the need for local governments to impose special rate variations under certain circumstances, we do not support the Tribunal’s recommendation to weaken the regulatory process of approval for special rate variations. The rate peg acting as a cap provides a key foundation for fairness in the rating system and in our view, the current special rate variation system provides rigor and transparency to the process surrounding the imposition of special rate levies beyond the rate peg amount. NCOSS contends that any move to reduce oversight of the imposition of special variations, would act to undermine the operation of the rate peg. As we noted during the Tribunal’s Sydney Hearing, the Tribunal performs an important role in rigorously ensuring that councils levy such rates in a reasonable and cost-determinative manner, thereby keeping the financial impact on ratepayers, particularly people with lower or fixed incomes, to a necessary minimum.

Recommendation 6

NCOSS recommends that IPART retain regulatory oversight over processes to determine special rate variations.

3. Modify eligibility for rate exemptions

NCOSS has some concerns surrounding the Tribunal's recommendation to remove blanket rate-exemptions for Public Benevolent Institutions (PBIs), and base rate exemptions on land use rather than ownership. We note that the Tribunal has further recommended that land used for residential purposes should be rateable, regardless of whether or not it is owned by a PBI.

We are very concerned that, in its draft report, IPART implies an equivalence between for-profit providers of housing, and not-for-profit providers of social and affordable housing, by suggesting that PBIs gain an 'unfair' competitive advantage through rate exemptions on their properties. Such an equivalence fails to recognize the significant public and community benefit provided by ensuring that people with low and fixed incomes have access to affordable housing. It also fails to recognise that much of the social housing that exists could not otherwise be provided if all housing was subject to full market costs.

Impact on PBI-owned social and affordable housing

NCOSS recognises the Tribunal's concern that the transfer of social housing from the NSW Government to PBIs, or the construction of new PBI-owned social housing properties, could potentially have an impact upon council revenue, while still imposing requirements for the provision of infrastructure and services.

We believe that retaining effective exemptions from local government rates are crucial to ensuring that PBIs continue to be able to provide vital social and affordable housing. However, we do understand the concerns that if these exemptions are retained, there may be significant impacts on council's continuing ability to fund their services and infrastructure, and may act as a perverse incentive for councils not to approve social and affordable housing developments in their local government area. Accordingly, as part of their commitment to facilitate the supply of more social housing, NCOSS believes NSW Government support is required to overcome these challenges. Consequently, we recommend that the NSW Government fully fund a rebate that offsets 100% of council rates for PBIs providing Social Housing.

Recommendation 7

NCOSS recommends that no changes be made to the general exemptions for Public Benevolent Institutions providing social housing, unless the NSW Government supports the provision of Social housing by fully funding a rebate that offsets 100% of council rates for providers of social housing.

Impact on other PBIs

As we stated at the Sydney Hearing, we are concerned that the Tribunal's recommendation might have unintended consequences by exposing certain PBIs that provide vital long-term residential services to rating. We note the Tribunal has proposed defining 'residential activity' for rating purposes to include "situations where a property is ... occupied by the same resident continuously for periods of three months or greater".⁹ Our concern is that this loose definition could capture services that provide long-term, live-in support and treatment services, such as refuges for women escaping domestic violence, homeless shelters, and drug and alcohol rehabilitation facilities.

⁹ Independent Pricing and Regulatory Tribunal (2016), *Review of the Local Government Rating System: Draft Report*. IPART. Sydney, p.78.

In conversations with staff at IPART, we have been assured that it is not the intention of this recommendation to include these kinds of services. However, we believe that any changes resulting from the Final Report should be implemented in such a way as to make clear essential community services won't be captured by the change.

Recommendation 8

That the definition of 'residential activity' be drafted so as to provide explicit rate exemptions for PBIs providing services that may otherwise be captured by the broader definition of 'residential activity', including but not limited to women's refuges, homeless shelters and rehabilitation facilities that may involve continuous residence beyond 3 months.

4. Replace pensioner concessions with a rate deferral scheme

NCOSS is strongly opposed to the Tribunal's recommendation to abolish existing pensioner concession arrangements and replace them with a rate deferral scheme. In our view, such a change would produce a raft of negative outcomes for people with low and fixed incomes and in some cases, further entrench disadvantage. In effect, it would substantially increase costs for people who are already struggling to make ends meet. In turn, this would see many foregoing other essentials in order to meet the cost of rates.

Concessions and deferral across Australia

It is worth noting that all jurisdictions in Australia offer some sort of rate concession support to pensioners. Indeed, concession-only schemes operate in the majority of jurisdictions, with Victoria, Queensland, Tasmania, and the Northern Territory all offering 100% state-funded concession support to help pensioners pay their rates. Western Australia (WA) and the Australian Capital Territory (ACT) offer pensioners the choice of either concessions or rate deferrals. While the Tribunal has suggested that South Australia provides "rate deferral only" relief to pensioners, South Australia also provides pensioners with a (albeit modest) 'cost of living' concession to help them pay rates and meet other expenses.

Take-up of deferral schemes

If the rationale of a change to a rate deferral scheme is to offer rate support to pensioners, as an alternative to a concession rebate, then the take-up of any such deferral scheme is key to determining its functional value. It is the experience of NCOSS members representing the interests of older people that, in general, age pensioners are reluctant to attach debt to their estate. The problem is likely to be particularly pronounced in light of the Tribunal's proposal to impose an interest rate on the scheme close to the NSW Government's borrowing rates. Older people will be even less likely to take up a scheme that will see debt continue to accrue on their estate with the imposition of ongoing interest amounts.

Other jurisdictions within Australia with rate deferral schemes report very low take-up. For example, the ACT Treasury has reported take-up rates as low as 0.8%, with as few as 120 pensioners opting to defer rates out of a total of 15,000 pensioner ratepayers.¹⁰ Similarly, the Local Government Association of South Australia (LGASA)

¹⁰ Haines Norton Chartered Accountants (2005) *Report on the proposal for the postponement of Council rates - Seniors The Western Australian Experience*, p.12. Available at: http://www.lga.sa.gov.au/webdata/resources/files/The_WA_experience.pdf

has reported that take-up of the scheme in SA remains negligible. According to a LGASA-commissioned report published by Deloitte Access Economics in 2015, “... there is effectively no take up of the postponement provisions in the legislation, despite having been in place since January 2007.”¹¹

Given that the SA and ACT schemes appear to have been of questionable value, there is no reason to think that take-up will be any different in NSW. Accordingly, the replacement of the pensioner rate concession with a rate deferral scheme will only result in taking away much-needed support for pensioners, and lead to pensioners paying an extra \$250 per year out of their pockets to their local council.

Long-term costs of rate deferrals

While take up of a rate deferral scheme is likely to be very low, NCOSS is also concerned that there are likely to be significant long-term costs for those that opt to defer their rates. Over a period of time, the ongoing deferment of rates, and the additional imposition of above-inflation interest amounts, will significantly reduce the asset wealth of pensioners. This is particularly a problem for many Disability Support Pensioners, who are younger and therefore likely to accrue much larger deferment debts over their term of ownership. Additionally, they face the risk of having to make the payment if they need to move to be nearer to disability and/or health services; or to a property that is suitable to any physical disability that may change over time.

It is also a concern for age pensioners who wish to downsize their living arrangements, or who need to enter an aged care facility. In such circumstances, the need to settle a deferred rate debt on the sale of property will limit the ability of many pensioners to purchase suitable accommodation or access quality aged-care. At the very least, the accruing of a large deferred rate debt will deter many pensioners from downsizing at a time when encouraging older people to move to smaller homes is seen as a way of increasing the supply of larger homes to improve housing affordability for families with children.

There is also evidence to suggest that some pensioners may experience negative equity on their homes as a result of accrued rate deferrals. In the Deloitte Access Economics report referred to above, it was found that the value of rates outstanding for properties in regional South Australia could amount to 105% of the median net property value over a period of forty years. Once again, this is a potential problem for Disability Support Pensioners, who may defer payment over a lengthy period of time.¹²

Costs of concessions and rate deferrals

NCOSS appreciates the concern expressed by many councils that concessions incur considerable costs for local government, especially for those councils with a high number of pensioner ratepayers. We therefore accept the argument that ideally, rate concessions should be wholly funded by the NSW Government. We note that NSW Government funding for these concessions in 2016/17 is \$79 million, which is a relatively small amount in comparison to other concession categories.¹³ For example, in 2016/17 funding for the Low Income Household Energy Rebate is \$193 million, and funding for public transport concessions is \$560 million.¹⁴

NCOSS has therefore formally proposed in our annual Pre-Budget Submission that the NSW Government fund an increase to the pensioner rate rebate to a maximum of \$330 from 1 July 2017. This \$80 increase from the

¹¹ Deloitte Access Economics (2015) *Potential long run impact of postponement of rates by eligible ratepayers*, p.10. Available at: <https://www.lga.sa.gov.au/webdata/resources/files/2015%2001%20-%20Potential%20long%20run%20impact%20of%20postponement%20of%20rates.pdf>

¹² Ibid, p.13.

¹³ NSW Government, NSW Budget 2016-17 Budget Paper No. 1, p A6 17-A6 19.

¹⁴ Ibid, p A6 18.

current maximum represents 50 per cent of the estimated average amount of the new Emergency Services Property Levy (ESPL). We estimate this change would cost no more than \$25 million.

We also submit that the introduction of a rate deferral scheme has the potential to impose significant new costs for councils. Evidence put forward by council representatives at the Tribunal's Sydney Hearing noted potential administrative difficulties associated with managing deferrals, and accounting for them in light of the fact that the expense would be met by the NSW Government.

Evidence from the experience of councils following the introduction of a deferral scheme in WA appears to support this contention. According to a report commissioned by the LGASA ahead of the introduction of the South Australian scheme, councils in WA experienced significant technical, administrative, and practical issues and costs in implementing the scheme.¹⁵ Given these issues for councils and pensioners, NCOSS does not support the introduction of a rate deferral scheme.

Recommendation 9

NCOSS strongly recommends against any adoption of a rate deferral alternative.

Recommendation 10

NCOSS recommends that the current pensioner concession rebate system for local government rates be retained, with an \$80 increase of the rate rebate amount to a maximum of \$330.

Recommendation 11

NCOSS recommends that, consistent with its support of other concession rebates, the NSW Government be responsible for full cost of maintaining the pensioner concession rebate for local government rates.

Conclusion

NCOSS would once again like to thank the Tribunal for the opportunity to participate in this review. As we've noted throughout this submission, issues surrounding local government rates are of particular interest to people with lower and fixed incomes.

Whilst we believe that some of the recommendations put forward by the Tribunal attempt to address issues with the way that local governments can levy rates commensurate to the infrastructure and services they provide, the measures the Tribunal has recommended risk exacerbating disadvantage through higher unavoidable costs.

¹⁵ Haines Norton Chartered Accountants (2005) *Report on the proposal for the postponement of Council rates - Seniors The Western Australian Experience*, p.8. Available at: http://www.lga.sa.gov.au/webdata/resources/files/The_WA_experience.pdf