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20 December 2013

The Independent Pricing and Regulatory Tribunal
Level 8, 1 Market Street
SYDNEY NSW 2000

Dear Sir

Boorowa Council would like to thank IPART for the opportunity to make a submission on the "Local Land Services Board of Chairs Response to IPART Draft Report Review of funding framework for Local Land Services NSW December 2013."

Council strongly welcomes the intent of Local Land Services and believes that if the model is established correctly, there will be benefit for the broader community.

Upon reviewing the Local Land Services (LLS) Board of Chairs (BoC) submission, Council is extremely concerned and unsupportive of several of the recommendations included.

Council has also reviewed the submission prepared by Local Government NSW in response to the BoC's response and is supportive of the sentiments raised by LGNSW.

Areas of particular concern are as follows:

- The BoC's submission appears to move to a more generalised system of revenue raising, rather than a targeted approach of rating high risk creators and those that gain most benefit from the services provided. A general rate model will move away from having a visible link between funds raised and activity or services on the ground which has always been the intent of the LLS model.
- The BoC submission indicates that land holdings below 2 ha should also be subject to LLS rating. This in itself poses significant issues in that much of the urban area and particularly urban fringe area of rural communities would be caught up in the system proposed by the BoC's. From a Boorowa Council perspective, our community is already limited in their capacity to fund essential services such as water, sewerage, roads, footpaths and parks etc. Placing an additional financial burden on these residents to fund LLS rates is considered nonsensical, particularly in light of the fact that Council is becoming more

restricted in its ability to fund services. As IPART is aware, the Local Government rate peg for the upcoming financial year is 2.3%, far below wages increases and historical increases in fuel prices. Council's will soon have no other option than to consider Special rate Variations which will further stretch the capacity of landowners.

- In addition to the above comment, it is noted that the BoC's submission suggests that Councils should be responsible for collecting rates on holdings smaller than 2 ha. Collection of rate is already one of the most difficult aspects of local government administration and not something that can easily be extended to collect LLS rates. As mentioned above, communities already generally perceive that Councils are financially burdensome and an initial amount of money on a Council rates notice will be seen as a cost increase imposed by Councils.
- Council notes that the BoC's submission suggests all exemptions for public land holders be removed. Council believes that this recommendation should not be considered, with justification that Councils already undertake a significant amount of land management work on their land which offsets the need to pay rates for LLS purposes.

Council commends IPART to consider the submission of the BoC's unfavourably as there are a number of detrimental recommendations contained within the submission. As previously mentioned Boorowa Council is supportive of the LLS model provided it is correctly established giving adequate consideration to the points raised above in this submission.

Yours sincerely

A large black rectangular redaction box covering the signature of Wendy M Tuckerman.

Wendy M Tuckerman
Mayor
Boorowa Council