



Review of Funding Framework for
Local Land Services NSW
Independent Pricing & Regulatory Tribunal
PO Box Q290
QVB Post Office NSW 1230

20 December 2013

Dear Sir,

Submission – Review of a funding framework for Local Land Services NSW

I am making this submission on behalf of my Council, noting the short period to lodge a submission on this matter.

This matter has mainly come to our Council's attention through the submission made by Local Government NSW and their strong opposition to the submission made by the Board of Chair's submission.

The City of Ryde strongly supports Local Government NSW's submission. The key points of our Council's submission are the following;

1. The fundamental principle that IPART suggested in respect of Local Land Services (LLS), is that LLS should first recover their cost by targeting the actual risk creators and/or beneficiaries with a fee for service arrangement is supported. The suggestion of a base charge significantly changes this concept and unfairly proposes to unfairly spread the revenue burden onto property holders that should not be expected to contribute.
2. The suggestion that the land area threshold of 2 hectares be abolished is strongly opposed. The threshold of 2 hectares has been in place as LLS would normally apply to rural/semi-rural land. By reducing this threshold it means that properties in metropolitan areas would be subject to LLS charges and rates. Any suggestion along these lines should be rejected.
3. The proposal that Local Government be the collecting agency for LLS should also be rejected. There are a number of reasons why this should be rejected;
 - It would be another example of cost shifting from a State Government agency that denies Local Government to receive any income, in addition to not fully recovering its costs. There have been and continue to be many examples where Local Government, absorbs

on- going costs that is contributing to Local Government's deteriorating financial sustainability.

- At a time when IPART continue to provide minimal rate pegging limits to Local Government, if this component was imposed on Local Government, it would be unfairly perceived by our community that these were funds for Council.
- In a situation that a Council was considering undertaking consultation with its community for a special rate variation, and if Local Government was expected to be the collection agency for the State Government, then this would be a significant inhibitor for the Council in gaining the confidence and support from the community.

Finally, Council wishes to express its disappointment at the timing of this call for submissions. Not only has limited time been provided to respond but it has fallen outside Council's scheduled meeting cycle, making it not possible to engage with our elected Councillors.

I also strongly recommend that if IPART's recommendations have any impact on Local Government, especially those issues in this submission and Local Government NSW's submission, then further direct consultation be undertaken with Local Government. This will allow proper consultation to be undertaken, especially with all elected local government Councillors.

For further information please contact the Acting Group Manager, Corporate Services Shane Sullivan on 9952 8034.

Yours sincerely



Roy Newsome
Acting General Manager