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Submission: I make comment in respect to the methodology as follows:

3.2.1 "Proposed Approach to Assessing Scale and Capacity - An Appropriate Minimum Population Size, or a target number of councils in the metropolitan or regional area".

Neither of these approaches are considered appropriate for either rural or regional Councils. No comment is made in respect on Metropolitan Councils. Assessing Scale and Capacity based on a minimum population size potentially takes a "one size fits all approach" and as an example, the ILGRP in their report identifies as a Group G Council, a Council with a current population of 12,500 as a Council to stand alone and be in a JO. Population size is not everything. It will be very difficult to determine a requisite number both in terms of population size and number of Councils for either rural or regional Councils .

3.2.2 "Consistency with ILGRP Preferred Options"

Within the IPART report (page 24) reference is made to Group E councils that are not identified in bold (ie where the ILGRP has not identified a preferred merger option).

Such report identifies that where this is not the case and the option includes "Council in a JO or to merge," then "the merger option should be explored".

This direction needs clarification and correction. At the IPART consultation session held in Dubbo in respect of this matter, the Chairman advised the meeting "if not bolded, you can put in either proposal" (ie a JO or a merger proposal). The Chairman's position is consistent with the ILGRP's report which says JO or merge, with the key word being "or". Accordingly scale and capacity should be identified as being consistent with the ILGRP Report, where either identified option is pursued.