



20 December 2013

Attention: Dr Peter J Boxall AO, Chairperson, IPART

## **IPART Draft Report - Review of funding framework for LLS**

### **Submission from Griffith City Council**

#### *Background and Disclaimer*

This submission has been prepared on behalf of Griffith City Council but has not been formally adopted by Council. The submission from Council has been prompted by the response to the IPART draft report by the LLS Board of Chairs, which includes proposals that Council objects to, but which allowed little time for a position of Council to be resolved.

The history of settlement in the Griffith Local Government Area is not the same as other inland Cities, as Griffith was planned and built to serve the Murrumbidgee Irrigation Area. This has resulted in substantial areas of open space, large and small in area and located in urban and peri urban areas, being Crown Land with Council as Trustee. This is in addition to those lands owned by Council. The pattern of land settlement is also complex and influenced significantly by irrigation infrastructure. Any proposal to raise base charges on these lands is therefore of major concern to Council, as is the concept of using Council to collect fees on behalf of other Agencies. The context of these objections is detailed below.

#### *The concept of 'user pays' based on risk profile is generally accepted*

There is considerable logic, fairness and transparency in levying fees and charges for LLS services from those lands which use those services, or where there is a heightened risk of requiring LLS intervention as a result of the use of those lands. Departure from this principle is fundamentally flawed and opposed by Council.

#### *Council objects to transferring LLS charges to users of Council and Crown land*

The users of much of the Crown land under Council control represent low risk to the landscape and therefore of no requirement for LLS services. Licences for the use of these lands are temporary and numerous, making it difficult and time consuming to pass on LLS costs.

*Council objects to small areas of land being included for LLS assessment*

Of the 107 areas of Crown land under Council control, 72 are less than 2 ha in area. Any change to include land areas less than 2 ha for collection of LSS base charges is strongly opposed by Council as unnecessarily complex and unworkable. Many of these lands are in urban and peri urban areas of the City, and others are associated with irrigation, drainage and other infrastructure posing little risk of requiring LLS services.

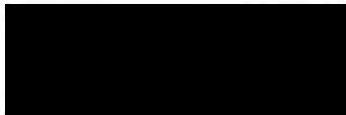
*Council objects to being used to collect fees, levies and charges for other Agencies*

Ratepayers do not like paying Council rates, let alone other fees and charges. There will be significant community outcry, confusion and distrust borne by Council should Council be required to collect fees and charges for other agencies including LLS, particularly if there is no nexus between the Agency charge and the use of the land, as suggested for LLS base charges. It would result in an unnecessarily complex system State wide given the number of Councils and the varied capacity of each to perform this task. It is not necessary to use Council, as the data necessary to apply the charge is available from the State.

*Council is already prominent in managing risks on public land and is not properly resourced to do so*

Despite resource constraints, largely due to State control over Council's ability to set its income level and the failure of the Crown to pay rates to Council, Council undertakes significant programs in weed and animal control independent of LLS funding support. The LLS funding framework should recognise this contribution to landscape management.

Thank you for the opportunity to make this submission.



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