

19 December 2013

Dr Peter J Boxall AO
Chairman
Independent Pricing and Regulatory Tribunal of New South Wales
PO Box Q 290
QVB Post Office NSW 1230

Dear Dr Boxall,

Re: Review of Funding Framework for Local Land Services NSW

Hornsby Council would make the following points in regard to the above review and the subsequent submission from the Local Land Services Board of Chairs;

As per our original submission, via Local Government NSW, Council supports the IPART Recommendation (Section 6.7 Draft Recommendation 8) that Local Land Services (LLS) should apply and operate their own funding collection mechanism (See previous submission).

Hornsby Council is opposed to the recommendation from the LLS Board of Chairs that properties less than 2 ha should be levied and that this levy should be collected by Local Government.

This position is based on the fact that properties less than 2 ha will receive few, if any, services from the newly created LLS. Council does not agree with the Board of Chairs contention that these properties pose a risk significant enough to levy them for biosecurity reasons. The IPART review maintains that LLS will be providing a fee-for-service, as properties less than 2 ha in Hornsby will receive little or no service, the contention that they should be levied is obviously flawed.

On Page 4 of the LLS Board of Chairs submission (Table 2) it is suggested that in addition to a base rate an NRM/environmental levy be included on properties less than 2 ha. Many councils already apply a special rate for natural resource management and this would be seen by rate payers as double dipping on this issue. Such a situation would put many Local Government environmental programs at risk.

The other major recommendation from the LLS Board of Chairs is that exemptions for public landholders be removed. This proposition is strongly opposed by Hornsby Council. The imposition of such a rating methodology would be completely inconsistent with current rating legislation and would result in some properties, which are currently non ratable, being sent a "rates notice" with only the LLS Levy on it.

A significant amount of Crown land is currently under the care, control and management of Local Government, the principal that one level of government would tax another level of government is not logical. The incentive to manage this type of land would be removed and the ability of Councils to conduct this

management would be reduced. Local Government would be more likely to return such lands to the State and not be involved with their management.

Finally, Hornsby Council would contend that this entire process is a cost shifting and blame shifting move from State Government to Local Government.

If you would like to discuss any of these matters further please contact Council's Chief Environmental Scientist, Dr Ross McPherson on (02) 98476708.

Yours faithfully



Mr Scott Phillips
General Manager
Hornsby Shire Council

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