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Submission: My concerns regarding the methodology for calling for submissions:

- a. Scale and Strategic capacity criteria should not be threshold criteria. There is no evidence that a large council is more effective, has better rates nor that it provides better services than a small council. In fact there is evidence that small councils are amongst the best in NSW and across Australia. Scale and Strategic capacity should not be threshold criteria.
- b. Scale and Strategic capacity should not be linked. There is no evidence to link the scale of a council with its strategic capacity therefore: The two criteria should be assessed separately.
- c. Scale – Minimum population: There is no evidence that bigger is better in fact the evidence is the opposite – that smaller is better for councils. There should be no number and no minimum population size.
- d. Scale – Target number of councils in metropolitan/regional areas. IPART itself has clearly acknowledged that there is currently no evidence base whatsoever for such targets. There should be no target number of council for metropolitan/regional areas.
- e. Strategic Capacity- The 10 Elements to measure Strategic Capacity should have benchmarks.
- f. Strategic Capacity – is proposed to be measured as well by the degree with which the local council co-operates with the State Government in rolling out their “planned development”. This prejudices local councils which are standing up for the rights of their residents as they can be seen to be impeding the State Government’s planned development. Scale and Strategic capacity measured by enabling the State Government’s planned development should be removed.
- g. Joint Organisations were originally recommended by the Independent Panel then the Government ruled them out in metropolitan Sydney. Regional Organisations of Councils (ROCS) are doing a great job in enabling significant savings for councils and should be able to be built on as a further business case model. Joint Organisations should be returned as an option for all councils and time allowed to develop business cases.
- h. All submissions to IPART should be made public as soon as possible.
- i. The timeline goes against good process and needs to be extended. IPART submissions close on 25 May and the final methodology and criteria will be published 1 June. This does not give enough time to fully consider all submissions; assess and respond to them and then develop the final document. In addition if changes are made to the document then the time becomes very short to enable councils to respond.