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Submission:

Firstly, I would like to put forward my strong support for Ipart's **"6.4 Fees-for-service"** recommendation. I am a land-holder in the Blue Mountains, with a property that comprises 99% native bushland, about 60% of which is protected vegetation. I have no intention of ever keeping livestock or poultry on the property and purchased it for the sake of preserving its native wildlife. It is absurd that I would be required to pay rates based on services that I, nor any future owner, would utilise or get any benefit from. It seems logical and just, that those who use the service, pay for it.

I am opposed to Ipart's recommendation under **"8.1 Overview of draft recommendations on most efficient rating base"**, specifically the statement... "the most efficient and appropriate 'unit' for calculating the variable component of LLS rates is the landholder's land area. We generally prefer land area to the current rating base – notional stock carrying capacity". As a land-holder in the Blue Mountains I am already paying monstrously high rates with my local council because my property is 16Ha, but being rated at residential rates. I have tried to apply to the council to have my property classed as "Farmland" to cut down my rates, but council's response was that I would not be able to run a miniature cow on the property, and because of its Bushland Conservation zoning and Protected Vegetation it would never be seen as farmland. Ironically then, I am currently paying LHPA rates for livestock services. My notional carrying capacity is currently 156 head, which is under review. However, even the general rating charges are inappropriate for my land. An LHPA ranger has viewed my property and will reduce my carrying capacity to the minimum 0.25 head per hectare, 4-5 stock for the property. If my land was rated on size, I would be paying the same amount as someone who could make quite an income with 200 stock on the same sized property. Thus, I believe that rating "per unit of product sold" under **"8.2 Most efficient rating base"** would be the most just way to rate landholders. If this first system is not agreed upon for some reason, rating based on "notional stock carrying capacity" could be the default option, but the rating based on "unimproved capital value of land" and "land area (per hectare)" make a mockery of the system and show it to be just another way to rob people of their money, rather than an exchange for a service.

Under **"8.3.3 Principles for allowing exemptions and discounts"**, the recommendation was made by Ipart that the *"LLS should establish a policy for granting individual landholders exemptions from specific fees, rates or levies"*. I believe that properties zoned as Bushland Conservation, particularly those containing Protected Vegetation, should be made exempt from LLS rating altogether.