

Our Ref: RP:gvm – 50/15/26

17 December 2013

Dr Peter J Boxall AO
Chairman
Independent Pricing and Regulatory Tribunal of NSW
PO Box Q290
QVB Post Office NSW 1230



Narrandera
Shire Council



Dear Dr Boxall

RE: Review of Funding Framework for Local Land Services NSW

Council writes to express its objections and concerns with the Local Land Services Board of Chairs' (BoC) submission to IPART's Draft Report on the Review of Funding Framework for Local Land Services NSW. The following comments and objections are provided:

- The BoC's submission of a base rate goes against IPART's Local Land Services (LLS) Funding framework report of targeting risk creators or beneficiaries with a fee for service arrangement. Concerns are expressed that this will create a general LLS fund that will lack accountability and transparency.
- The BoC recommendation that all risk creators are subject to the LLS rate including land holdings below 2HA excluding commercial and industrial land is rejected, in that proposal is not equitable and provides an added further tax burden upon land. Additionally, the LLS Boards are accountable to all ratepayers and not just those with land holdings over 2 HA.
- Extreme concern and objections are expressed for the BoC recommendation that all exemptions for public land holders be removed. Council already commits significant resources to public land holdings whether its slashing and mowing, rubbish collection or clearing of fire trails, as examples.
- The BoC proposal that Councils should collect the base rate and the rate for natural resource management for land with an area below 2HA. Council strongly objects to this proposal as an added and unnecessary burden upon Council's resources. The issue of Council issuing rate notices also abdicates the LLS accountability in this regard. Additionally, Council and Councils in general are already burdened by cost shifting from the State and Federal Government.

Council trusts that the comments provided are of assistance, please do not hesitate to contact me if your require any further clarification.

Yours faithfully



Ray Pluis
General Manager

