



Our reference: 4462687
Contact: Andrew Moore
Telephone: 4732 7802

20 December 2013

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

Dear Mr Boxall

LLS Board of Chairs Submission on Funding Framework for LLS NSW

I would like to respond to the Local Land Services Board of Chairs' submission to IPART Draft Report on its Review of Funding Framework for Local Land Services NSW.

Penrith City Council echoes the concerns submitted by Local Government NSW in its submission dated 9 December 2013. Objection is made to the following proposals submitted by the Board of Chairs:

1. Elimination of the 2 hectare land area threshold

IPART has suggested that Local Land Services (LLS) should recover costs predominantly from risk creators and beneficiaries. Charging a flat rate to land less than 2 hectares is inconsistent with that approach and would be an unfair impost on many urban residential properties.

2. NSW Councils should collect the LLS income on land areas below 2 hectares

Transparency and accountability would be lost if NSW Councils collected the LLS income. Ratepayers are likely to identify the charge as an additional local government rates regardless of what is stated on the Rate Notice. Customer service will be compromised when ratepayers ring their local Council to discuss the charge and then need to be referred to LLS NSW for further information. Dispute resolution would be difficult and administration costs for councils would be substantial. Penrith City Council is strongly opposed to being the collection agent for any LLS income.

3. All exemptions for public land holders be removed

There is no justification for land owned by Local Government to be subject to LLS rates. Local Government already applies significant resources to public land management and natural resource management and should have no further obligation to pay rates for LLS purpose.

I also would like to reiterate the LGNSW sentiment that, as the Board of Chairs' submission suggests significant changes to the model previously considered,

IPART should consider recommencing the review to enable all stakeholders to adequately respond before recommending the implementation of any of the above items as submitted by the Board of Chairs.


Yours sincerely,


Alan Stoneman
General Manager