

Council's Reference:
DS/JC

Telephone Enquiries to:
General Manager's Office



20 December 2013

Review of Funding Framework for Local Land
Services NSW
Independent Pricing and Regulatory Tribunal of NSW
PO Box Q290
QVB Post Office NSW 1230

Dear Sir/Madam

Submission

Council appreciates the opportunity to lodge a submission to this review, however does not believe that levying special rates to fund local land boards is an appropriate model.

We believe that Local Government rates should be solely used to fund the provision of its own infrastructure and services and not for any other revenue collection functions of other agencies. From past experience in other states, the use of rates to fund other services on behalf of fire or ambulance services has met with confusion by ratepayers and the collection of arrears, provision of payment arrangements and the allocation of bad debts becomes problematic. In some cases, councils have sought to distance themselves from the collection of these funds by rate notice descriptors identifying the State as the agency making the levy, resulting in the State legislating against the practice.

Richmond Valley Council has a very low rate base compared to other comparative councils in its group, and any additional levies on the notice will impact councils differently as a percentage increase. Council is concerned about the imposition of additional levies because of the community's capacity to pay.

In addition, Council rates are a tax on land value. The funding of local land service boards is based on the stock carrying capacity of land. The unimproved value of land may have no correlation to the relative capacity to pay or of their consumption of local land services and therefore be inequitable.

Yours faithfully

A handwritten signature in black ink, which appears to be 'Derek Swanborough', is written over a solid black rectangular redaction box.

Derek Swanborough

Acting General Manager *correspondence should be addressed to:*

**The General Manager,
RICHMOND VALLEY COUNCIL**

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