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18 December 2013

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

### **Review of Funding Framework for Local Land Services NSW**

Dear Mr Boxall

Shellharbour City Council wishes to endorse some views expressed by LGNSW in the letter by President, Councillor Keith Rhodes APSFM's letter to you dated 9 December 2013.

Shellharbour City Council's particular concerns are prioritised as follows:

1. Council is strongly opposed to any reduction in the proposed land area threshold below a minimum of two hectares, except in situations where the subject properties are used for commercial, botanical agriculture or commercial animal or bird husbandry. Any proposal that the land area threshold of two hectares should be reduced for the purposes of application of an LLS rate, or a rate for Natural Resource Management, directly confronts any Council with the possibility of additional costs to its ratepayers. Any additional tax burden to ordinary Council ratepayers on properties of less than two hectares in area is unacceptable, whether it is levied as a tax on the individual ratepayer, or on the Council, which must then recover from the ratepayer.
2. Shellharbour Council disagrees with any proposal which might see Council required to collect levies on behalf of another State agency. Council's current experience with collection of an expensive Waste Management Levy for the use of its best practice waste processing site, equipped with methane flare treatment and a materials recycling centre, is regarded by ratepayers and Council alike, as an impost by State government, with negligible, or indefinable benefit to this city's community.
3. Council recognises the need for consideration and mitigation of risk factors which necessitate the provision of LLS services. However, Council is resolute in its view that the appropriate way to recover the costs of this management is application of an equity principle and levying only those who generate the need for these services and thereby benefit from them.
4. Council therefore wishes to register its strongest objection to any imposition of State revenue collection regimes on Councils, or to any LLS levy on Council owned, community or operational land of any size, or to any LLS levy on private or corporately owned land of less than two hectares in size, unless that land is used for commercial botanical or animal / bird husbandry pursuits and the owners / operators of that land are therefore the causers and beneficiaries of a targeted LLS rate application.

**Independent Pricing and Regulatory Tribunal of NSW  
Review of Funding Framework for Local Land Services NSW**

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For any further information required about this submission, you might contact Council's Group Manager Finance Tony Gearon on 02 4221 6005.

Yours sincerely

A large black rectangular redaction box covers the signature area. There are faint blue ink scribbles around the box, possibly remnants of a signature or initials.

Michael Willis  
**General Manager**