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Dear Mr Boxall

REVIEW OF FUNDING FRAMEWORK FOR LOCAL LAND SERVICES NSW

I write to express Council's objection to a number of recommendations made in the Local Land Services (LLS) NSW Board of Chairs' response to IPART's Draft Report – *"Review of Funding Framework for Local Land Services."*

1. **The proposal that councils be responsible for collecting LLS funds for land with an area below two hectares.**

There would be significant collection and administrative costs in levying and collecting the LLS charge. I note since the 1970's, legislation has bound Council to levy and collect rates on behalf of a State Catchment Management Authority ie Hunter - Central Rivers Catchment Management Authority (HCRCMA). Apart from payment of a small commission, this administrative burden provides little benefit to Council. I note that even with the establishment of the new LLS Board, Council will continue to collect the existing HCRCMA rate in addition to any proposed LLS charge.

In addition there will be a perception among ratepayers that the LLS charge will be a Local Government related levy. This perception already exists for the above-mentioned HCRCMA rate. The proposed arrangement would consequently result in a lack of accountability for the LLS boards.

2. **The recommended removal of the two hectare land area threshold for land that could be liable to a LLS rate.**

In lowering the above threshold it is possible for significantly higher numbers of urban and semi-urban residential properties to be liable for the LLS charge. There appears at this time to be no clear indication of whether residential properties will be liable to the charge. However core LLS board include services such as:

- advice on production for farm businesses
- bio security including plant and animal health
- plant and animal pest control
- natural resource management
- emergency response.

These would provide little or no benefit to the typical residential land owner. Additionally some of these services are already provided by Council's own resources.

It should also be noted that additional charges such as those proposed further restrict the ratepayers' capacity to pay any increased Council rates. This would make support for any Special Rate Variation Council wishes to proceed with even more difficult to achieve.

3. The recommendation that public land holder exemptions be removed.

Council objects to this proposal as significant Council funding is already allocated to the management of natural resources and public land. I note that Local Government is not legally entitled to rate crown land and accordingly it is equitable that public land owned by Council would also be exempt from any State imposed LLC charge.

I thank you for the opportunity to submit Council's thoughts on the LLS Board of Chairs' submission and I look forward to a more equitable funding method being implemented.

Yours faithfully



Ken Gouldthorp
GENERAL MANAGER

Cc Local Government NSW