

20th 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

Council writes in total support of Local Government NSW's (LGNSW) serious concerns with the Local Land Services Board of Chairs' (LLS BoC) submission to IPART Draft Report on its Review of Funding Framework for Local Land Services (LLS) NSW.

The following matters are of particular concern to Wakool Shire Council:

- Abolition of the land area threshold of 2 hectares

Council is totally opposed to any land of less than 2 hectares being included as LLS rateable land being proposed by LLS BoC. This is just a mechanism to allow LLS to broaden their taxation base for very little or no real benefit to those landholders. This broad brush revenue grab approach in its self leads to inefficiencies and will create general discontent from those landholders being asked to pay for something they haven't had to in the past.

- Councils should collect rates for land with area below 2 hectares

Council vehemently opposes any suggestion that Local Government becomes a collection agency for the LLS. Council believes that each Government Department should be responsible for the collection of its own revenue and be answerable to those ratepayers, not cherry pick and have Local Government drawn into conflict about level of LLS rates and services levels. Council can also see administrative issues about timing of payments to LLS and handling of non-payment of LLS rates.

- That all exemptions for public land holders be removed

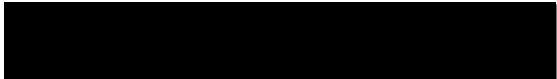
Council is extremely concerned with the LLS BoC recommendation that rate exemptions for public land holders be removed. This recommendation is considered

at all, should applied on a board base review so all public authorities are not disadvantage just to benefit the LLS.

Wakool Shire ratepayers have become a victim to the above exemptions previously when the NSW government brought one of the largest freehold properties in Australia, "Yanga Station" in 2005 and converted it into a National Park. This purchase effectively pulled \$80,000 from Council's rate base and forced Council to collect this shortfall from all other Council ratepayers in the Shire in order to continue to maintain and replace the road infrastructure providing access to Yanga.

Should you require any further information please do not hesitate to contact the undersigned at the Moulamein Office on 03-5887 5007.

Yours faithfully



Bruce Graham
General Manager