

20 December 2013

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

Dear Dr Boxall,

Re. Review of Funding Framework for Local Land Services NSW

Thank you for your invitation to make a submission in response to the Local Land Services Board of Chairs (BoC) response to the IPART draft report of its Review of Funding Framework for Local Land Services NSW (LLS).

Council fully supports the stance taken by Local Government NSW President Cr Keith Rhoades and is strongly opposed to LLS BoC recommendations that land holdings below two (2) hectares be subject to a LLS rate, that Councils collect rates on behalf of LLS and that exemptions for public land holdings be removed.

Council is particularly concerned about the impact that a LLS rate would have on ratepayers if all land including land holdings below two hectares became subject to the LLS rate. Councils already face rate funding challenges and the imposition of any new tax on ratepayers would ultimately impact on the ratepayer ability to pay rates and further limit Councils ability to raise the required funds needed to service ratepayers into the future.

In regard to the collection of LLS rates Council believes that a centralised billing system that is open and transparent and administered by a central organisation that have the expertise to provide education and adequately respond to billing enquires and concerns should be implemented.

Due to the specialised services that LLS supply and the queries that the LLS rate would inevitably generate it is not believed that Council would be an effective provider of any billing or customer service function.

Council is also opposed to collecting LLS rates due to the perceptions that this would create with rate payers. If LLS rates were to appear on Council Rates and Charges Notices as recommended it is unlikely that ratepayers would view Council as a collection agency for LLS only and would ultimately expect a service for this new rate that Council would be unable to provide.

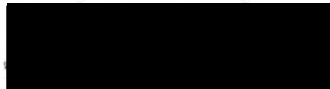
Inevitably this would lead to increased volumes of ratepayer enquiry, resentment towards Council and result in Councils decreased ability to service ratepayers on Council related matters due to services being provided to field LLS rate enquiries.

Council is also concerned that a new rate on Councils Rates and Charges Notices would impact on any community support towards any future Special Rate Variation (SRV) application as the community is likely to perceive that rates have already increased as a result of the LLS rate.

With regard to public land Council already undertakes management and control of Council owned land and Crown land under Councils care. Significant resources are used to maintain public land and manage any environmental concerns occurring on this land. Council is therefore opposed to LLS BoC recommendation to remove exemptions for public land holdings.

Should you require any further information or wish to discuss this matter further please contact Councils Revenue Team Leader, Simone Fisher on 4677 8222.

Yours faithfully,

A solid black rectangular box used to redact the signature of Les McMahon.

Les McMahon
General Manager
Wollondilly Shire Council