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F2004/08177



17<sup>th</sup> December 2013

Dr Peter J Boxal AO  
Chairman  
Independent Pricing and Regulatory Tribunal of NSW  
PO Box Q290  
QVB Post Office NSW 1230

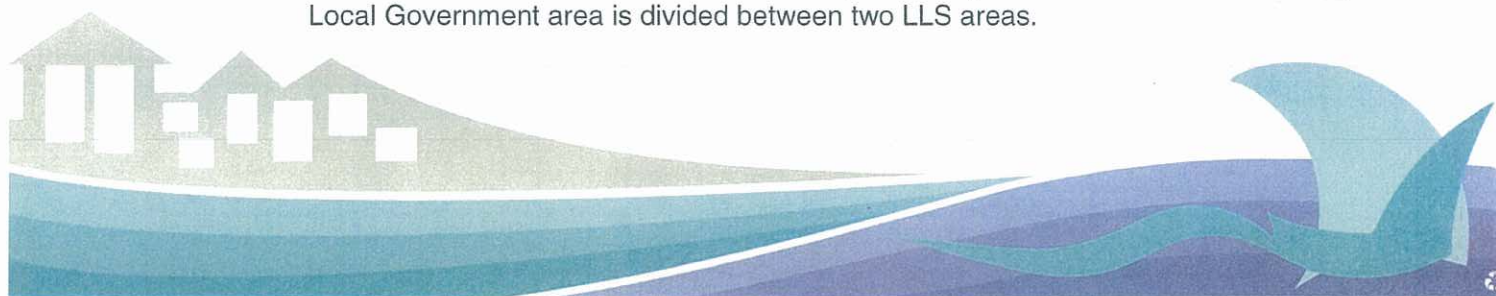
Dear Dr Boxall

Wyong Shire Council at its Ordinary Meeting held on 11<sup>th</sup> December 2013 resolved unanimously on the Motion of Councillor Eaton, Mayor, the following:

- "1 That Council make a submission to IPART strongly objecting to the proposal by the Local Land Services (LLS) Board of Chairs' which will:
- a require Council to collect or pay LLS rates in respect of land holdings less than 2Ha in area;
  - b make Council land holdings subject to LLS rates.
- 2 That a copy of the Council submission be forwarded to the Premier, Minister for Lands and Local Members of Parliament for Wyong, The Entrance and Swansea.
- 3 That a copy of the Council submission also be forwarded to the President of Local Government NSW."

Council is concerned with a number of issues raised in the LLS Board of Chairs' submission to IPART, in particular:

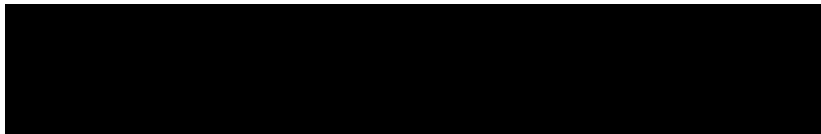
- The basic principle suggested by IPART that Local Land Services should recover their cost by targeting actual risk creators and or beneficiaries with a fee for service arrangement.
- The land area threshold of 2 hectares for land that could be subject to a LLS rate for the proposed base rate and the rate for natural resource management. Wyong Council strongly opposes lowering the threshold as it would result in an encroachment of LLS rates into urban residential areas including strata properties.
- The proposal that councils should collect the base rate and the rate for natural resource management for land with an area below 2 hectares. Wyong Council strongly opposes using councils to collect LLS rates as it results in a lack of accountability for Local LLS boards as ratepayers are likely to perceive any LLS rate/levy collected by a council as a Local Government levy. There would also be considerable collection costs to the councils and complications in instances where a Local Government area is divided between two LLS areas.



- Wyong Council strongly objects to the recommendation that all exemptions for public land holders be removed. Wyong Council applies significant resources to public land management and natural resource management. This expenditure more than offsets any obligation to pay rates for Local Land Services purposes. Wyong Council is already subject to various NSW Government charges, levies and rents for Crown lands under their management and there is no justification for Local Government's land holdings to be subject to LLS rates.

A copy of this submission has been sent to the Premier of New South Wales and Wyong Council's local State Members of Parliament with a request for assistance to Council in its endeavours to have overturned a number of the key recommendations and proposals by the LLS Board of Chairs to the IPART "Draft Report of Funding Framework for Local Land Services (LLS)".

Yours sincerely

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Michael Whittaker  
**GENERAL MANAGER**