

Review of Fees for Development Control Services

Report on Miscellaneous Fees

INDEPENDENT PRICING AND REGULATORY TRIBUNAL
OF NEW SOUTH WALES

Review of Fees for Development Control Services

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FOREWORD

The Premier has requested that the Tribunal review the pricing principles for development control services. This report is the second of three reports for this review. It covers the Tribunal's recommendations for charges levied by councils for issuing planning and building certificates, providing certified copies of documents, and registering Part 4A and complying development certificates.

In developing these guidelines, the Tribunal has considered the views of a variety of interested parties. The Tribunal has published an issues paper and a consultation paper which stimulated a range of submissions.

A working group was formed to assist the Tribunal in this review. The Tribunal acknowledges the assistance provided by the working group and by all those who provided comments and submissions to the Tribunal.

A consultant was engaged to assess the costs incurred and the revenue obtained by a selection of councils in connection with these activities. The results of the consultant's study have been considered by the Tribunal in reaching decisions about recommended changes to the miscellaneous fees.

The Tribunal believes that the recommendations contained in this report take a fair and balanced approach in recommending maximum charges for the relevant development control services.

Thomas G Parry
Chairman
February 1999

EXECUTIVE SUMMARY

Chapter 1 Introduction

This report is the second of three reports comprising the Independent Pricing and Regulatory Tribunal's review of fee setting for development control services. This report recommends changes to the fees charged by councils for issuing planning and building certificates, registering Part 4A and complying development certificates, and providing certified copies of documents.

The recommendations of the Independent Pricing and Regulatory Tribunal follow careful consideration of pricing principles, the efficient cost of service delivery, the revenue impact on councils, and the impact on users of these services. A summary of the recommended changes is presented at the end of this chapter.

Chapter 2 Current fees and issues

Chapter 2 sets out the current fees applying to the various certificates, and the major issues arising from the Tribunal's review of pricing for these certificates.

Some explanation of pricing principles and cost methodologies is also provided.

Chapter 3 The consultancy study

Consultant Pannell Kerr Forster (PKF), was engaged by the Tribunal to research and analyse the cost, revenue and price impacts of altering the miscellaneous fees of local councils.

The report of PKF is available upon request. A summary of the major aspects of the report is set out in Chapter 3. One council was chosen from each of 11 broad category groupings based on size and location, including urban and rural regions. PKF surveyed these 11 councils regarding their processes and the costs of providing the relevant services.

The consultant's major findings with respect to each of the services under consideration are set out in the chapters of this report dealing with each service.

Chapter 4 Planning certificates

The Tribunal recommends setting one maximum fee of \$40 for the simultaneous provision by councils of both a planning certificate pursuant to s149(2) and additional advice pursuant to s149(5) of the *Environmental Planning and Assessment Act, 1979*. A fee of the same amount is also recommended in cases where only a planning certificate under s149(2) is provided. This recommended fee is equivalent to the current regulated fee of \$40 for the issuing of only a s149(2) certificate.

Chapter 5 Building certificates

The Tribunal recommends increasing the maximum fee for certificates in respect of class 1 or 10 buildings from \$50 to \$70. A proportionate increase in the price of certificates for other classes of buildings is also recommended.

Chapter 6 Fees for certified copies

The Tribunal recommends maintaining a maximum fee of \$40 for the provision of a certified copy of a document, map or plan. However, councils are free to charge less than this price if they feel it is appropriate to do so.

Chapter 7 Registration fees

Where a council registers a Part 4A or complying development certificate, the Tribunal recommends setting a new fee of a maximum of \$10 per certificate.

Chapter 8 Other issues

All the fees recommended in this report are intended to be set for two years, and no indexation is to be applied within that two year period.

The Tribunal recommends that councils continue to be allowed to charge an add-on fee for urgent processing, provided that a well developed and enforceable service agreement exists so that non-urgent cases are dealt within an acceptable timeframe.

It should be noted that the new fees recommended in this report do not come in to effect with the release of the report. The recommendations have been referred to the Minister for Urban Affairs and Planning for consideration, and the Minister will provide advice to the industry of any changes to fees, and of the implementation dates for any new fees. The recommendations, if implemented, will require amendments to the current regulation.

The following table summarises the Tribunal's recommendations.

Type of service	Current fee	Tribunal's recommended maximum fee
Planning certificate	<ul style="list-style-type: none"> \$40 for a s149(2) certificate without any additional council advice An additional fee of up to \$60 for the provision of additional council advice pursuant to s149(5). 	\$40 for a planning certificate combined with additional advice under s149(5). The same fee is payable for a planning certificate without the additional advice.
Building certificate (a) Class 1 or 10 building	\$50	\$70
(b) Other class of buildings Less than 200 m ²	\$50	\$70
200 -2000m ²	\$50 + 10 cents per m ² over 200	\$70 + 14 cents per m ² over 200
Greater than 2000 m ²	\$230 + 1.5 cents per m ² over 2000	\$322 + 2.1 cents per m ² over 2000
(c) In any case where the application relates to a part of a building and that part consists of an external wall only or does not have a floor area	\$50	\$70
Council may require the payment of an additional fee if it is necessary to carry out more than one inspection of the building before issuing a building certificate	Not exceeding \$25	Not exceeding \$35
Registering certificates	Not regulated	\$10 per certificate
Provision of certified copy of a document	\$40	\$40

1 INTRODUCTION

1.1 Background

Pursuant to section 12A of the *Independent Pricing and Regulatory Tribunal Act, 1992*, the Premier has requested that the Independent Pricing and Regulatory Tribunal ("the Tribunal"):

- develop principles and indicative fees for development control services
- provide guidelines to assist in the setting of fees for development control services which are newly opened to competition (contestable services).

For reporting purposes, this review has been split into three components. In December 1998, the Tribunal published its findings in regard to the setting of prices for contestable services. This was the first part of the full report.

This, the second part of the full report, recommends indicative fees for miscellaneous services provided by local councils. These services include: the issuing of planning and building certificates, the registration of Part 4A and complying development certificates and the provision of certified copies of documents held by councils.

The Tribunal's recommendations regarding indicative fees for development applications is expected to be released in July 1999. This will comprise the third part of the final report.

1.2 The report process

This report is the result of a detailed investigative process which has involved:

- publishing an issues paper (December 1997)
- publishing a consultation paper (July 1998)
- forming a working group including representatives of interested parties
- engaging the services of consultant Pannell Kerr Forster (PKF) to analyse the financial aspects of the provision of miscellaneous services by councils.

The Tribunal has considered the views expressed by all interested parties in conjunction with the findings of the consultant.

1.3 The purpose of this report

This report recommends fees to be charged by local councils for:

- issuing planning certificates (under sections 149(2) and 149(5) of the *Environmental Planning & Assessment Act, 1979*)
- issuing building certificates
- providing certified copies of documents
- registering part 4A certificates and complying development certificates.

2 CURRENT MISCELLANEOUS FEES AND KEY ISSUES

Current fees, as regulated under the *Environmental Planning and Assessment Regulation 1998*, are set out in the following table:

Table 2.1 Current miscellaneous fees

Type of service	Current fee
Planning certificates <ul style="list-style-type: none"> • Issue of certificate under s149(2) • Provision of advice under s149(5) 	<ul style="list-style-type: none"> • \$40 • Up to \$60
Building certificates (a) Class 1 or 10 buildings (b) Other classes of building: <ul style="list-style-type: none"> • Floor area of up to 200 m² • Floor area of 201m² - 2000 m² • Floor area greater than 2000 m² (c) Other applications which relate to a part of a building and that part consists of an external wall only or does not have a floor area	<ul style="list-style-type: none"> • \$50 • \$50 • \$50 + 10 cents per m² over 200 • \$230 + 1.5 cents per m² over 2000 • \$50
Additional fee may be charged if more than one inspection	<ul style="list-style-type: none"> • \$25
Provision of certified copy of a document	Up to \$40
Registration of certificates	Not regulated

2.1 Pricing principles

The basic principles when setting prices are that prices should be cost reflective and transparent. From an economic perspective, prices should signal the resource cost of supplying a particular service. From a financial perspective, prices must provide a secure revenue base for the on-going, commercial provision of the service.

Cost reflective pricing requires that no cross subsidisation occur between council activities. Cross subsidisation occurs when the costs of providing a particular council service are not recovered from the price charged for that service, while at the same time, the price of another service is higher than the costs incurred. This leads to inefficiency in resource use. The over-priced service is likely to be under-utilised, whereas demand for the subsidised service may be heightened.

The issue of transparent price setting by local councils is addressed by provisions in the *Local Government Act, 1993*, which requires prices to be notified in council management plans and to be open to public scrutiny.

Cost reflective pricing requires that the costs of providing a particular service be taken into account when pricing that service. Accordingly, the first step in determining cost effective pricing is to ascertain the costs attributable to the provision of a particular service. There are

numerous methodologies for allocating costs to particular services. A brief summary of the two methodologies adopted in this report follows.

2.1.1 Fully distributed costs

The fully distributed costs of an activity are calculated by allocating a portion of the total indirect costs of the business to that activity along with all of the direct costs of that activity. Items allocated include: direct costs such as wages and materials, and a proportion of indirect costs such as overheads and the costs of support services.

One way of allocating indirect costs is on a pro-rata basis. For instance, accommodation costs can be allocated on the basis of the floor space occupied by the specific business activity as a proportion of the total floor space of the council building. Alternatively, the allocation of costs could be made on the basis of staff hours utilised in providing the particular service as a percentage of total labour time expended by council staff.

2.1.2 Avoidable costs

Avoidable costs are calculated on the basis of the costs that would be avoided by an agency if a particular service was not provided. Avoidable costs include direct costs such as labour and materials, along with some indirect costs, such as personnel costs, which vary when the product is not supplied. The extent of overhead costs to be included in the calculation will depend on the nature and size of the activity, as well as the time period over which costs are assessed to be avoidable. For instance, rent is often included in cost calculations. However, if a particular activity is such a small component of the services provided by a council that it requires no additional floor space, rent would not be avoided if the service was no longer provided. Consequently, rent would not be included in the calculation of the avoidable costs of that activity. At the other extreme, if a substantial business activity is fully ring-fenced, the entire cost of the unit constitutes avoidable costs.

Avoidable costs are always equal or less than fully distributed costs. The lower the amount of joint or shared costs, the less the degree of divergence.

Avoidable costs are the minimum sustainable price in a contestable market. Prices below that minimum would result in losses which must be funded from other services. This subsidisation is not sustainable in the long term.

2.1.3 Indexation

Whatever fees are determined as appropriate, the Tribunal must consider whether those fees should be indexed to allow for the effects of inflation. Of course, if the fees are set for a period of only one or two years and then subject to review, indexation will not be required.

2.2 Key issues

2.2.1 Cost and revenue impacts

In considering the need to adjust current fees, the Tribunal is mindful of:

- (i) the revenue impacts on councils; and
- (ii) the impacts on the users of miscellaneous services.

The Tribunal has considered the following cost recovery issues:

- the extent to which efficiency improvements are possible
- which cost basis to use
- which costs should be recovered.

The total revenue obtained by councils from the issuing of planning and building certificates would be expected to fall as outlined in Attachment C. The sample of the 11 councils included in the PKF survey indicates that revenue from these certificates would fall by approximately 32%. The sample shows a fall of 0.13% in total council revenue.

Of course, councils would also have a new source of revenue stemming from the recommended establishment of a new fee for registering certificates.

2.2.2 Specific issues

In determining maximum charges for each of the specific services, the Tribunal has considered various other issues. These issues are addressed in detail in the relevant chapters. A general summary of issues follows:

Planning certificates

- Setting of a single fee regardless of the information contained in the certificate.
- Costs of maintaining the system.
- Legal costs.

Building certificates

- Legal costs.

Registration fees

- Whether the fee should be set on a per certificate basis or a per development basis.
- Whether to allow a discount for multiple lodgments.

3 THE CONSULTANCY STUDY

The services of consultant Pannell Kerr Forster (PKF), were engaged by the Tribunal to research and analyse the cost, revenue and price impacts of altering the pricing methodology pertaining to the miscellaneous fees of local councils.

PKF's report has been provided to members of the working group and is available upon request.¹ A summary of the major aspects of the consultant's report follows.

3.1 Terms of the consultancy

PKF's services were obtained to assist the Tribunal to make recommendations for indicative prices for the miscellaneous fees and charges of local councils. PKF was asked to:

- quantify the costs incurred and revenue obtained by local councils from issuing planning and building certificates
- estimate the costs incurred and the revenue obtained by councils in regard to registering certificates issued by private certifiers and providing certified copies of certificates held by councils
- compare the results for urban and rural councils to discover any divergences.

3.2 Process followed by the consultant

The process followed by PKF involved:

- (i) Preparing and issuing a written survey to 12 councils asking for details of the costs and the revenue associated with the functions under consideration. Eleven councils responded to the survey. They represent a variety of councils from all the 11 broad category groupings of various sizes and locations, including urban and rural regions.
- (ii) Discussing the survey with councils before the surveys were completed, to ensure consistency of responses.

Although the survey provides the best available basis for decision-making by the Tribunal, it is not a large enough sample to support statistically significant findings about councils in general.

For each of the council functions, PKF analysed each council's standard process. PKF included only those tasks which are completed in 100% of applications. If additional investigations or other unusual work had been involved in providing a service, it was not included in the survey results.

PKF surveyed councils regarding only their direct costs ie staff salaries incurred in performing specific tasks. Overhead costs were estimated to be \$31 per person per hour for urban councils and \$20 per person per hour for rural councils. This rate had been determined in a previous analysis undertaken by the consultant, and is still considered to be valid.

¹ Contact Anne McCawley at IPART on (02) 9290 8499.

3.3 The key findings

The consultant's major findings with respect to each of the services under consideration are included in the chapters dealing with that service.

4 PLANNING CERTIFICATES

4.1 Planning certificates

Pursuant to s149(1) of the *Environmental Planning and Assessment Act, 1979*, a person may, on payment of the prescribed fee, apply to a council for a planning certificate.

Subsection (2) of section 149 of that Act provides:

On application made to it under subsection (1) the council shall, as soon as practicable, issue a planning certificate specifying such matters relating to the land to which the certificate relates as may be prescribed (whether arising under or connected with this or any other Act or otherwise).

Clause 112 of the *Environmental Planning and Assessment Regulation, 1994*, specifies what information must be included in a planning certificate. The required information varies, but always includes zoning and planning restrictions.

A council may also include in a planning certificate, advice on any other relevant matters affecting the land of which it may be aware (see s149(5), *Environmental Planning and Assessment Act, 1979*).

In its submission to the Tribunal,² the Law Society of NSW suggests that a planning certificate should include the following:

- information on all zoning matters
- rate information
- health and building notices.

The Law Society also recommends that planning certificates have a standardised format and content. The Tribunal agrees with this comment. Although this recommendation is outside the scope of the current review, the Tribunal supports the development of guidelines for a standard content and format for planning certificates.

Clause 106 of the *Environmental Planning and Assessment Amendment Regulation, 1998* states:

- 106 (1) The prescribed fee for the issue of a certificate under section 149(2) of the Act is \$40.
- (2) A council may charge one additional fee of not more than \$60 for any advice given under section 149(5) of the Act.

Applications for planning certificates are normally made by both the vendors and by any prospective purchasers as part of the property transfer and sale process.

4.2 The Tribunal's preliminary views and public submissions

The Tribunal's initial view is that the fee for issuing a planning certificate should be set at avoidable costs, ie incremental labour costs and incremental software costs.³

² Submission by the Law Society of NSW, 27 October 1998.

³ The Independent Pricing and Regulatory Tribunal, *Review of Fees for Development Control Services – A Consultation Paper*, July 1998, p 81.

A summary of the submissions received by the Tribunal is included in Attachment B to this report.

4.3 Findings of the consultant

PKF reports the following general findings from its analysis of the 11 councils:

- The extra time taken by councils to issue section 149(5) advice in addition to a s.149(2) certificate is minimal.
- The number of applications for planning certificates received per year varied widely among the surveyed councils (from 5,960 to only 36).
- In all cases, the percentage of total council revenue (including grants and rates) which is attributable to planning certificates is small, amounting to a maximum of 0.9%.
- Almost all councils surveyed made a profit from issuing planning certificates. This was measured as the difference between average revenue and total average costs per application, including estimated overheads per application.
- Looking at a fully distributed costs basis, PKF estimates that every council would experience a fall in revenue. The fall in revenue is estimated to be even greater if avoidable costs are used, as the activities in question generally do not require the employment of significant additional resources.

4.4 Issues considered by the Tribunal

4.4.1 A single fee?

Currently a fee of \$40 is charged for issuing a planning certificate pursuant to s149(2) of the *Environmental Planning and Assessment Act, 1979*, and an additional fee of up to \$60 may be charged for providing a s149(2) certificate with additional council advice pursuant to s149(5) of the *Environmental Planning and Assessment Act, 1979*.

As the time required to provide advice under s149(5) in addition to a standard planning certificate is minimal, the working group suggests setting a single price for both services combined. This fee would be charged irrespective of whether a s149(2) certificate is required in isolation, or whether a planning certificate combined with s149(5) additional advice is requested. PKF supports this suggestion.

During the meeting of development control fees working group on 3 December 1998, the Department of Urban Affairs and Planning (DUAP) indicated that it has received requests from councils to review planning certificates. Some councils are seeking to eliminate the single s149(2) certificate altogether, and replace it with the planning certificate combined with additional advice. A representative of the Housing Industry Association pointed out that setting a single fee, irrespective of whether a single or combined certificate is issued, would ultimately lead to the abolition of requests for the s149(2) certificate alone.

4.4.2 Cost methodology

PKF has found that the percentage of total revenue obtained from issuing planning certificates is very small. Many councils use existing resources to produce these certificates. The total labour cost of these activities is only a small part of councils' overall labour requirements. These factors point to the appropriateness of using avoidable costs to

establish prices. However, other costs (eg computer related costs, insurance indemnity and legal costs) are also incurred. Furthermore, the costs identified by the consultant exclude costs for those processes that do not occur 100% of the time, eg customers are sometimes contacted to ensure details on their applications are correct.

PKF recommends that the fee be set at a level that recovers the direct costs as well as some proportion of overheads applicable to the issuing of relevant certificates. The Tribunal supports PKF's recommendation.

4.4.3 Costs of putting information into the system

DUAP has advised the Tribunal that many councils find the costs of putting information on to the computer/database system is time consuming and expensive. This is supported by some of the written submissions received. The PKF analysis has not taken these database input costs into account. However, these functions represent core council business. In the consultant's view, the associated costs should not be recovered from the issuing of certificates. The Tribunal also considers that these costs should be independent of the process of issuing certificates.

4.4.4 Legal costs

Neither legal fees, nor professional indemnity insurance, have been included in the PKF study.

4.4.5 Impact analysis

Revenue impact on councils

In the PKF report, the consultant's analysis shows that:

- If fees are set on an avoidable cost basis using the weighted average of the 11 councils surveyed, there will be a significant reduction in revenue from planning certificates for the 11 councils surveyed. In the case of a s149(2) certificate, the revenue reduction is estimated at 65%. For planning certificates which include advice under s149(5), the reduction is estimated at 72%.
- If fees are set on a fully distributed cost basis using the weighted average of the 11 councils, there will be a small increase in revenue (5%) for issuing s149(2) planning certificates and a large reduction in revenue (55%) for issuing s149(2) and (5) planning certificates.

Although the fees from planning certificates represent a relatively small proportion of councils' revenue, the Tribunal is mindful that any revenue loss to councils may have adverse effect on their capacity to deliver services.

The Tribunal's recommendation for a standard fee, irrespective of the nature of the information contained in the certificate, will result in a large decrease in the revenue obtained by councils for a planning certificate including advice under s149(5). In this case the revenue could fall by up to 60%.

No alteration in fees for the issue of a standard planning certificate has been recommended. However, it is unlikely that such requests, in the absence of additional council advice, will continue.

Impact on users

For the 11 councils surveyed, about 54% of applicants had requested a s149(2) planning certificates. The remaining 46% had requested s149(2) and (5) certificates.

Under the Tribunal's recommended fees, there will be no financial impact on those applicants who seek s149(2) planning certificates. There will be a saving of up to \$60 for applicants seeking both s149(2) and (5) planning certificates.

4.5 Summary of the Tribunal's recommendations

In recommending changes to the current fees for planning certificates, the Tribunal aims to achieve a balanced outcome having regard to: cost reflective pricing, revenue impact on councils, impact on users, and incentives to improve efficiency.

The Tribunal therefore recommends setting a single fee of \$40 for the simultaneous provision by councils of both a planning certificate pursuant to s149(2) and additional advice pursuant to s149(5) of the Environmental Planning and Assessment Act, 1979. A fee of the same amount is recommended in cases where a planning certificate only is requested without s149(5) council advice.

The recommended fee is equivalent to the current prescribed fee for issuing a planning certificate, but it does not include the additional amount of \$60 currently allowed for the provision of additional advice.

Based on the consultant's analysis, the recommended fee of \$40 lies between the amount calculated on a fully distributed costs basis and the amount calculated by reference to direct, or avoidable costs. PKF calculated the fully distributed costs of the 11 surveyed councils as \$45 for issuing combined s149(2) and s149(5) certificates. The weighted average avoidable cost for the same service was calculated at \$28. The recommended fee of \$40 is therefore closer to the fully distributed cost, but between the calculated figures.

The results of the consultant's survey indicate that at a fee of \$40, the three councils which had the lowest fully distributed costs would be able to recover these costs. Clearly, where a set fee is imposed, there is an incentive for councils to become more efficient in order to recover a greater portion of costs, eg recovering fully distributed as opposed to avoidable costs.

In recommending a \$40 fee, the Tribunal has made an allowance for the costs associated with professional indemnity insurance. However, no allowance has been made for other legal costs. This is because in the Tribunal's view, the costs of unsuccessful litigation should be borne by any council which is found negligent, not by users of its services.

5 BUILDING CERTIFICATES

5.1 The building certificate

Sections 149A, B, C, D, E, F and G of the *Environmental Planning and Assessment Amendment Act, 1997*, have effect with respect to building certificates. Section 149B(2) of the Act allows for regulations to be made which set procedures for applying and dealing with applications for building certificates, as well as for the fees payable in connection with such applications.

Very generally, a building certificate is in force for the period of 7 years from the date on which it is issued. A building certificate operates to prevent a council from making, in certain circumstances, an order requiring that the building in respect of which the certificate is issued be repaired, demolished, added to, or altered. In addition, a building certificate prevents a council from taking procedures regarding certain encroachments on to land vested in councils, or under council control.

The current fees for building certificates are set out in clause 107 of the *Environmental Planning and Assessment Amendment Regulation, 1998* as follows:

170(1) For the purposes of section 149B(2) of the Act, the fee for an application for a building certificate in relation to a building is:

(a) in the case of a class 1 building (together with any class 10 buildings on the site) or a class 10 building⁴ — \$50 for each dwelling contained in the building or any other building on the allotment, or

(b) in the case of any other class of building — as set out in the following Table:

Floor area of building or part	Fee
Not exceeding 200 square metres	\$50
Exceeding 200 square metres but not exceeding 2,000 square metres	\$50, plus an additional 10 cents per square metre over 200
Exceeding 2,000 square metres	\$230, plus an additional 1.5 cents per square metre over 2,000

(c) in the case where the application relates to a part of a building and that part consists of an external wall only or does not otherwise have a floor area— \$50.

(2) If it is reasonably necessary to carry out more than one inspection of the building before issuing a building certificate, the council may require the payment of an additional fee (not exceeding \$25) for the issue of the certificate. However, the council may not charge an additional fee for any initial inspection.

(3) In this clause, a reference to a class 1 building includes a reference to a class 2 building that comprises 2 dwellings only.

5.2 The Tribunal's preliminary view and public submissions

The Tribunal's preliminary view was that fees for building certificates should be based on avoidable costs and that this would result in an increase in fees for single dwellings⁵.

⁴ A class 1 building is a dwelling, while a class 10 building constitutes a non-habitable structure ancillary to a dwelling. These terms are defined in the *Building Code of Australia*.

⁵ Independent Pricing and Regulatory Tribunal, *Review of Fees for Development Control Services – A Consultation Paper*, July 1998, p 81.

A summary of the submissions received by the Tribunal is included in Attachment B to this report.

5.3 Findings of the consultant

PKF made the following general findings.

- There is a wide variation in the number of applications for building certificates received by councils in a particular year (from 24 to 1,081), but the variation is not as great as for planning certificates.
- The percentage of total council revenue applicable to building certificates is even smaller than for planning certificates, varying from 0.01% to 0.10%.
- The total time spent by each council issuing each building certificate is far greater than the time spent issuing a planning certificate.
- Every council surveyed made a loss for providing building certificates. This was measured as a negative difference between the average revenue and the total average costs per application.

PKF concludes that while councils are over-recovering on planning certificates, they are under-recovering on building certificates.

PKF also advised that although the cost associated with travelling to inspection sites is higher in regional areas due to the greater distance to be covered, overall there is no clear cost differential between urban and rural councils.

5.4 The Tribunal's considerations

5.4.1 Cost methodology

The Tribunal has considered the weighted average direct costs of providing building certificates, as determined by the consultant. The direct costs of building certificates, as ascertained by PKF, include motor vehicle expenses incurred in attending a site visit.

The Tribunal has considered the respective merits of both the avoidable and the fully distributed costs methodologies as a basis for fee setting. PKF indicates that the percentage of total revenue obtained from issuing building certificates is very small and that many councils are utilising existing capacity to produce these certificates. The total labour costs devoted to these activities are only a small part of the councils' overall labour requirements. These factors point to the appropriateness of using avoidable costs to establish prices.

However, other costs (eg computer related costs, insurance indemnity and legal costs) are also incurred. Furthermore, the costs identified by the consultant exclude costs for those processes that do not occur 100% of the time, eg where a problem has been noted at an applicant's dwelling and a notice of intent is issued or an order is issued for works to be completed.

PKF finds that the weighted average avoidable direct cost is \$62 and the weighted average fully distributed cost is \$121 per certificate. PKF recommends that the fee be set at a level that recovers the direct costs as well as some proportion of overheads applicable to the issuing of relevant certificates. The Tribunal supports PKF's recommendation.

5.4.2 Legal costs

Neither legal fees nor professional indemnity insurance have been included in the PKF study.

In its recommendation, the Tribunal makes allowance for the costs of professional indemnity insurance.

5.4.3 Impact analysis

The PKF study indicates that most councils are under-recovering costs in respect of building certificates. A move to more cost reflective pricing would lead to an increase in revenue for councils.

The Tribunal has considered various levels of fees between avoidable costs (\$62) and fully distributed costs (\$121). While it is desirable to make prices more cost reflective, the impact on users must also be considered.

On balance, the Tribunal recommends that the fee for a class 1 or 10 certificate, as well as that for a building with a floor area of less than 200 m², increase from \$50 to \$70. A proportionate increase in building certificates issued for other classes of buildings is also recommended.

5.5 Summary of the Tribunal's recommendation

The Tribunal recommends a fee of \$70 for issuing a building certificate for class 1 or 10 buildings. A proportionate increase in fees for certificates in respect of other categories of building is also recommended.

Under this recommendation, the fees for building certificates would become more cost reflective. There would be an increase of 40% in revenue from building certificates. The Tribunal notes the additional costs to users, but considers that the recommendation represents a balanced outcome.

6 FEES FOR CERTIFIED COPIES

6.1 Consultant's findings

The current fee for the provision of a certified copy of a document is given in clause 108 of the *Environmental Planning and Assessment Amendment Regulation, 1998*:

108 The prescribed fee for a certified copy of a document, map or plan referred to in section 150(2) of the Act is \$40.

However, the consultant indicated that there is no consistent method of charging for this service among the councils that were surveyed. The councils in the survey were charging from \$1 (to cover photocopying costs) to \$50 for this service (the latter amount being in excess of the regulated fee of \$40). As this service is requested infrequently, data in regard to this service is very limited. Accordingly, the consultant was unable to draw any significant conclusions.

6.2 The Tribunal's recommendations

The Tribunal recommends maintaining the current fee of \$40 as a maximum for providing a certified copy of a document.

Because there is a dearth of cost information available in regard to the provision of this service, the Tribunal has been unable to adequately assess costs and apply a well recognised cost methodology to this service.

Some councils charge a very small fee for this service, being only the cost of the photocopying service. In such circumstances, it would not be in the public's interests to require such councils to recover more than this amount, provided the current fee is covering costs and is sustainable.

The Tribunal therefore recommends maintaining the current \$40 fee as a maximum for this service. Councils would be free to charge below this price if they feel it is appropriate to do so, and a lower fee would recover the avoidable costs of this service.

7 REGISTRATION OF CERTIFICATES

7.1 The registration requirements

As a result of the amendments to the *Environmental Planning and Assessment Act, 1979*, the issuing of complying development certificates, and Part 4A (compliance, construction, occupation and subdivision) certificates, is now contestable. Section 100 of the *Environmental Planning and Assessment Amendment Act, 1997*, and Part 10 of the *Environmental Planning and Assessment Amendment Regulation, 1998*, cover the requirements for certificates issued by consent authorities and accredited certifiers to be included in council registers.

Section 100 of the *Environmental Planning and Assessment Amendment Act, 1997*, states:

- 100 (1) A council must, in the prescribed form and manner (if any), keep a register of:
- (a) applications for development consent;
 - (b) the determination of applications for development consent (including the terms of development consents granted under this Part), and
 - (c) the determination of applications for complying development certificates (including the terms of complying development certificates issued under this Part), and
 - (d) decisions on appeal from any determination made under this Part.
- (2) The register is to be available for public inspection, without charge, at the office of the council during ordinary office hours."

Part 10 of the *Environmental Planning and Assessment Amendment Regulation, 1998*, lists the matters which council must maintain on a register, whether they are "made to it as the consent authority or furnished to it in cases where it is not the consent authority."

Where the accredited certifier receives the certification fee, the council must still bear the cost of registration of the certificate.

7.2 The Tribunal's preliminary views and public submissions

In a previous report⁶, the Tribunal proposed that councils be permitted to levy fees in order to recover the costs of registering certificates, provided that any fees charged to private certifiers also be charged to customers of the council itself. The Tribunal considered that incremental labour and filing costs are likely to be within the range of \$5 to \$10 per certificate.⁷

A summary of the submissions received by the Tribunal is included in Attachment B to this report.

7.3 Findings of the consultant

At the time of the consultant's study, councils were not required to register certificates. Accordingly, PKF were unable to analyse actual data held by councils in regard to this activity. Instead, PKF obtained estimates from a few councils regarding the time and the

⁶ Independent Pricing and Regulatory Tribunal, *Review of Fees for Development Control Services: Report on Competitive Neutrality in Pricing*, December 1998, p 25.

⁷ Independent Pricing and Regulatory Tribunal, *Review of Fees for Development Control Services – A Consultation Paper*, July 1998, p 79.

process which would be employed to undertake these activities. Based on these figures, PKF estimates:

- The direct cost of registering certificates varies between \$8 and \$17 per certificate. This variation among councils is due largely to variations in the salary of the staff member performing the task. The efficiency of the registration process is highly dependent on the information technology used by the council.
- When indirect overhead costs are taken into account, total costs range from \$21 to \$35, with the arithmetic mean equating to \$27.

7.4 The Tribunal's considerations

7.4.1 Cost basis to be used

In its consultation paper, the Tribunal expressed its initial view that fees for the registration of certificates should be charged on an avoidable costs basis. Pannell Kerr Forster (PKF) support this view when they recommend that the fee for the registration of documents should be set at a level that reflects direct costs only. Recovery of overheads would, in their view, be achieved through other development control services.

The avoidable costs basis was recommended by the Tribunal in its final report on competitive neutrality pricing by councils in regard to contestable services (issued in December 1998).

In the consultation paper⁸, the Tribunal indicated that the fee for registering certificates should be charged on an avoidable costs basis and was likely to be in the range of \$5 to \$10 per certificate.

7.4.2 Fee per certificate vs fee per development

A major issue of concern to the working group has been whether fees charged by councils for registering certificates should be determined on a per certificate basis, or by development proposal.

A fee per certificate, while administratively and legally simple, may have incentive-related problems. For non-complying developments, councils determine both how many certificates are required, and at what stages of the development process they are needed. Given this, allowing councils to charge a fee on a per certificate basis, provides an incentive for councils to require a greater number of certificates than would otherwise be the case, thus obtaining increased revenue from registration fees. The incentive may not, however, be a great concern if the registration fee is small.

Setting a fee on the basis of type of development rather than per certificate would create difficulties for councils as they would need to determine the type of development in order to levy the appropriate fee. It would be difficult to ascertain an appropriate value for the registration fee and to regulate that fee. Fee setting on a per development basis would necessitate determining a typical number of certificates required for each development category. Deviations from the norm would not be covered in a registration fee set on this basis.

⁸ Independent Pricing and Regulatory Tribunal, *Review of Fees for Development Control Services, Consultation Paper*, July 1998, p 79.

7.4.3 Economies from multiple registrations

Council resources could be used more efficiently if a bundle of certificates is registered simultaneously. The perceived savings from bulk registration would result mainly from economies of scale attributable to registration fees being paid together as one transaction, thereby requiring fewer accounting-related activities.

In view of these possible economies of scale, some members of the working group supported offering a discount if all the certificates pertaining to a development are simultaneously lodged for registration at the conclusion of the project. However, such a discounting proposal has its problems. Firstly, for very large developments, the development project could continue for many months, if not years. During this development period, councils would have no record of the progress of the development. Under such a system, councils will be ill equipped to answer queries, or keep a check on the progress of the development. In addition, under such a system, the longer the time it takes for a project to reach completion, the greater the chance of certificates being mislaid and for unauthorised work to go undetected. Discounts for bulk registration are therefore not recommended.

Another alternative is to set a variable fee structure. Under such a structure, a discount would be allowed if certificates were lodged within a set period from the date of their provision by the certifier. Such a fee structure however would be cumbersome to administer and regulate.

7.4.4 Impact analysis

As there is currently no regulated fee for the registration of certificates, the Tribunal's recommended fee would represent a new source of revenue for councils and will be an additional expense for clients. The impact on clients will depend on the nature of the developments. For example, the development of a new single dwelling will require registration of a construction certificate, 3-5 compliance certificates during the construction stages and an occupation certificate. Additional costs of registration for this development would amount to \$50-\$70. However, the additional costs should be considered in light of the potential reduction in time and costs for developers through the availability of private certifiers under the new system.

7.5 Summary of the Tribunal's recommendations

As foreshadowed in its report on Competitive Neutrality in Pricing, the Tribunal recommends setting a standard fee of \$10 per certificate to reflect councils' cost of registration.

8 OTHER ISSUES

8.1 Overall revenue impact on councils

The reduction in revenue in issuing s149(2) and (5) planning certificates will be partially offset by the revenue increase from the higher recommended fee for building certificates. The combined revenue impact of the Tribunal's recommendations on changes to fees for planning and building certificates using the selected sample of 11 councils used in the PKF study, is shown in Attachment C. The revenue reduction ranges from negligible to 0.35% of council's total revenue.

However, the overall impact on revenue would depend on the level of new revenue from registration of certificates.

8.2 Indexation

The Tribunal recommends that all the fees recommended in this report be fixed for a period of two years, after which, they may be reviewed. Given the current and anticipated low inflation rate and expectation of ongoing efficiency improvements, the Tribunal recommends that no indexation of these fees be undertaken in the two year period during which the fees are recommended to be set.

8.3 Service standards

For both building and planning certificates, councils frequently process requests on an urgent basis for an additional fee. The Tribunal has some reservations about this practice as it may lead to the diverting of resources from standard applications, in order to process urgent applications with the result that the standard application is processed over an unduly lengthy period.

Such problems could be minimised if councils have service agreements specifying appropriate time limits for the provision of standard services. Compensation should be available to applicants whose applications are not dealt within the period specified in these service agreements. In this way, councils would be restrained from disrupting standard processing times in order to process urgent applications.

The Tribunal therefore recommends that councils continue to be allowed to include an optional add-on fee for urgent processing, provided that the council has a well developed and enforceable service agreement so that non-urgent cases are dealt within an acceptable timeframe.

ATTACHMENT A: OUTLINE OF REVIEW PROCESS

As part of the consultation process for this review, meetings were held with organisations involved in local government, and with metropolitan and rural councils. Representatives of these organisations also presented their views at public hearings held as part of the review. Various aspects of the review into council development control fees were discussed, with the review of the certificates the subject of this second report. The Tribunal is grateful for the high level of co-operation and participation from all those involved.

Organisations which participated in meetings during the review

Bankstown City Council
Baulkham Hills Council
Blacktown City Council
Building Control Commission, Victoria
Corowa Shire Council
Department of Infrastructure, Victoria
Department of Local Government
Department of Urban Affairs and Planning
Hastings Council
Health and Building Surveyors Association
Housing Industry Association
Institution of Surveyors
Julie Bindon & Associates
Kogarah Council
Liverpool City Council
Local Government and Shires Associations
New South Wales Treasury
North Sydney Council
Office of Local Government, Victoria
Parkes Shire Council
Penrith City Council
Property Council of Australia
Royal Australian Planning Institute
Scott Carver Pty Ltd
Singleton Shire Council
Sutherland Shire Council
Sydney City Council
Total Environment Centre
Tweed Shire Council
Urban Development Institute of Australia
Western Sydney Regional Organisation of Councils
Wagga Wagga City Council
Willoughby City Council
Woollahra Municipal Council

Members of the Working Group on development control fees

Eric Groom, Independent Pricing and Regulatory Tribunal (Chairperson)
Kerry Bedford, Department of Urban Affairs and Planning
Elsie Choy, Independent Pricing and Regulatory Tribunal
Leonie Dennis, Housing Industry Association
Patricia Gilchrist and Gordon Wren, Urban Development Institute of Australia
Ian Glendinning, Environmental Health & Building Surveyors Association
Murray Kidnie and Shaun McBride, Local Government and Shires Associations
Ken Morrison and Warwick McInnes, Property Council of Australia
Michael McMahon, Waverley Council
Keith Richardson, Royal Australian Planning Institute
Michael Rolfe, Total Environment Centre
John Scott, Department of Local Government
Alan Wells, Singleton Council

Public hearings

Sydney, 9 March 1998
Sydney, 10 March 1998

Submissions to Draft Terms of Reference

Organisation

Armidale City Council
Blue Mountains City Council
Casino Council
Department of State & Regional Development
Department of Urban Affairs and Planning
Gosford City Council
Hornsby Shire Council
Housing Industry Association, NSW Division
Institute of Municipal Management
Institution of Surveyors
Local Government and Shires Associations
Maclean Shire Council
Mosman Municipal Council
Pittwater Council
Royal Australian Planning Institute
Ryde City Council
Snowy River Shire Council
Sutherland Shire Council
Tweed Shire Council
Urban Development Institute of Australia
Vaucluse Progress Association

Name

S. Gow
P. Bawden
R. Schipp
L. Harris
K. Bedford
J. Murray
R. Ball
P. Fielding
C. Gregg
R. Phillips
M. Kidnie
R. Donges
V. May
D. Fish, A. Gordon
D. Broyd
S. Weatherley
P. Reynders
J. Rayner
D. Broyd
P. Gilchrist
M. Rolfe

Submissions to Issues Paper

Organisation	Name
Armidale City Council	S. Gow
Bankstown City Council	G. Beasley
Bathurst City Council	C. Pitkin
Baulkham Hills Shire Council	M. Watt
Blacktown City Council	W. Gersbach
Blue Mountains City Council	P. Bawden
Broken Hill City Council	K. Boyle
Byron Shire Council	R. Kent
Cessnock City Council	J. Tupper
Concord Council	R. Marshman
Department of Urban Affairs and Planning	S. Holliday
Environment Protection Authority	N. Shepherd
Eurobodalla Shire Council	P. Tegart
Fairfield City Council	C. Weston
Gosford City Council	R. Benson
Greater Lithgow City Council	S. McPherson
Holroyd City Council	J. Thompson
Hornsby Shire Council	P. Hinton
Housing Industry Association, NSW Division	S. Kerr
Hunter's Hill Council	B. Smith
Institution of Surveyors NSW Inc.	R. Phillips, P. Price
Inverell Shire Council	D. Pryor
Kempsey Shire Council	B. Casselden
Kogarah Municipal Council	G. Clarke
LandCom	M. Burt
Liverpool City Council	T. Antony
Local Government and Shires Associations	M. Kidnie
Long Service Leave Payment Corporation	K. Napper
Macleay Shire Council	R. Donges
Maitland City Council	D. Evans
Master Builders' Association	C. Bourne
Meriton Apartments Pty Ltd	H. Triguboff
Muswellbrook Shire Council	C. Gidney
Northern Suburbs Regional Planning Group	J. Vescio
NSW Treasury	J. Pierce
Pittwater Council	D. Fish
Port Stephens Council	P. Westin
Property Council of Australia	M. Quinlan
Queanbeyan City Council	H. Percy
Rockdale City Council	S. Blackadder
Rockdale City Council	G. Raft
Royal Australian Planning Institute	D. Broyd
Shoalhaven City Council	W. Gee
Strathfield Municipal Council	D. Smith
Sutherland Shire Council	J. Rayner
Total Environment Centre	J. Angel
Tweed Shire Council	R. Paterson
Urban Development Institute of Australia	P. Gilchrist
Vaucluse Progress Association	M. Rolfe

Willoughby City Council	J. Owen
Wollongong City Council	A. Roach
Woollahra Municipal Council	G. Fielding
Wyong Shire Council	K. Yates

Submissions to Consultation Paper

Organisation	Name
Burwood Council	B. Olsen
Canterbury City Council	J. Montague
Cessnock City Council	S. Leathley
Department of Local Government	G. Payne
Gosford City Council	J. Murray
Hawkesbury Nepean Catchment Management Trust	M. Hughes
Hornsby Shire Council	P. Hinton
Housing Industry Association NSW Division	E. Crough
Hunter's Hill Council	J. Vescio
Kogarah Municipal Council	G. Clarke
Landcom	R. Gilmore
Leeton Shire Council	E. Stoneman
Local Government & Shires Associations	M. Kidnie
Maclean Shire Council	R. Donges
Manly Council	R. Holten
Marrickville Council	M. Smith
North Sydney Council	S. Francis
Northern Suburbs Regional Planning Group	J. Vescio
Orange City Council	S. Sykes
Penrith City Council	P. Morgan
Royal Australian Planning Institute	J. Toon
The Institute of Surveyors NSW Inc.	R. Phillips
The Law Society of NSW	R.K. Heinrich
Vaucluse Progress Association	M. Rolfe
Wentworth Shire Council	D. McMillan
Willoughby City Council	J. Owen
Wollongong City Council	R. Oxley
Woollahra Municipal Council	P. Carl

ATTACHMENT B: SUMMARY OF SUBMISSIONS

The consultation paper and research paper for this review were released on 27 July 1998. A summary of views presented in the submissions received follows.

Planning and Building Certificates

Kogarah Council submits that planning certificates should be costed on a fully distributed costs basis, including any direct policy costs. Gosford Council also supports full cost recovery.

Hunter's Hill Council strongly opposes any proposal to reduce the fee for issuing planning certificates, due to the high cost of system and information maintenance.

Wollongong and Willoughby City Councils submit that assuming certification costs are avoidable, ignores the maintenance costs of the documentation system. Willoughby Council also comments that planning certificates are a critical document in the land transfer process.

Leeton Council states that the assumption that all councils are fully computerised for the purposes of issuing planning certificates, is wrong. Small rural councils cannot afford the capital cost of the computer system, or the labour costs to load the data. The current fee level must be maintained.

Manly Council considers the \$40 fee for a planning certificate is acceptable for the work involved. The \$60 fee for additional information is, in that council's view, excessive. The current fee for a s149D building certificate is inadequate.

Hunter's Hill Council proposes a minimum fee of \$100 for building certificates issued in respect of Class 1 and Class 10 buildings, and \$200 for certificates in respect of other building classifications.

Orange Council believes that there is some merit in setting fees based on avoidable costs. However, some certificates require inspections of records and properties and not all councils are able to process planning certificates by computer.

The Housing Industry Association supports fees for planning and building certificates being set on the basis of avoidable costs.

The Law Society of NSW makes a number of comments on planning certificates, including:

- all zoning matters should be disclosed in the s149(2) certificate
- rate and planning information should be provided in the same certificate
- health and building notices should also be included
- councils should issue only one certificate for properties on several lots
- certificates should have a standard format and content.

Council Registration of Certificates

Leeton and Gosford Councils propose full cost recovery.

Canterbury and Willoughby Councils submit that charges of \$20 - \$50 are not excessive when maintenance, registration, archive and access costs are considered.

Woollahra Council supports a standard registration cost, with the proviso that the fee which is set accounts for the cost of record maintenance and retrieval. A nominal access and inspection fee should be applied.

The Institution of Surveyors' view is that \$20 - \$50 per certificate may be excessive.

Kogarah Council would prefer that registration costs are not regulated – rather, they should be set by individual councils on the basis of fully distributed costs, reflecting the level of technology used.

HIA does not support charging a fee for registering certificates.

ATTACHMENT C: OVERALL REVENUE IMPACT ON COUNCILS – PLANNING AND BUILDING CERTIFICATES

	Council's total revenue \$	No of certificates issued			Current revenue from planning and building certificates					Revenue change under IPART recommendations				
		s149 (2)	s149(2)&(5)	Building certificates	s149 (2)	s149(2)&(5)	Building certificates	Subtotal	% of council's revenue	s149 (2)	s149(2)&(5)	Building certificates	Total	% of total revenue
					\$	\$	\$	\$		\$	\$	\$	\$	
U1	131,338,000	915	1,585	144	36,600	158,611	14,695	209,906	0.16%	-	(95,100)	5,878	(89,222)	-0.07%
U2	47,000,000	1,039	1,755	442	42,800	177,520	23,200	243,520	0.52%	-	(105,300)	9,280	(96,020)	-0.20%
U3	45,166,000	1,368	1,787	328	54,840	178,700	22,000	255,540	0.57%	-	(107,220)	8,800	(98,420)	-0.22%
U4	51,097,821	2,631	3,329	1,081	106,480	332,900	53,317	492,697	0.96%	-	(199,740)	21,327	(178,413)	-0.35%
U5	52,376,000	1,565	35	174	62,600	3,500	8,700	74,800	0.14%	-	(2,100)	3,480	1,380	-0.00%
U6	35,300,000	3,352	1,338	837	134,080	133,800	42,475	310,355	0.88%	-	(80,280)	16,990	(63,290)	-0.18%
R7	51,084,000	1,031	924	545	41,240	92,400	27,250	160,890	0.31%	-	(55,440)	10,900	(44,540)	-0.09%
R8	4,437,000	34	2	0	1,360	200	0	1,560	0.04%	-	(120)	-	(120)	0.00%
R9	8,340,000	145	42	43	5,690	4,160	2,228	12,078	0.14%	-	(2,520)	891	(1,629)	-0.02%
R10	10,200,000	271	20	40	11,243	2,000	2,000	15,243	0.15%	-	(1,200)	800	(400)	0.00%
R11	18,563,000	437	29	24	17,480	2,940	1,220	21,640	0.12%	-	(1,740)	488	(1,252)	-0.01%
Total	454,901,821	12,788	10,846	3,658	514,413	1,086,731	197,085	1,798,229	0.40%	0	(650,760)	78,834	(571,926)	-0.13%