

December 1, 2003

IPART
Domestic Waterfront Rent Review
PO Box Q290
QVB PO 1230

Dear sir

We wish to object to the proposed new formula for the rental structure of leased waterfront/wetlands.

We also wish to object to short time affected individuals and groups have been given to respond to the issue. We ask that the deadline for submissions be extended and the review be widely advertised to inform all the community.

We hold a Licence, the cost of which has increased by more than 30% in the last 10 years. This is in line with the CPI as indicated on the Licence itself and means that the Government's income has not been eroded.

It is our responsibility to maintain the leased area which we are happy to do but we have no exclusive access to it. We cannot build on it and we have no tenure. We maintain structures that were erected on the area more than 40 years ago but cannot update or modernise them. Yet we pay rent for land over which we already have rights to as members of the public.

The proposed new rating method is flawed in many ways – it is not equitable, it fails to recognise the many different wetland leases and uses, and the 6% figure is grossly inflated.

It is simply erroneous to suggest "leased" waterfront areas can be valued in line with "freehold" adjoining land. It does not make sense. We are joining many others in opposition to the changes proposed in the review.

Yours sincerely



Peter Sutton & Kay Cottee AO.
