

Attachment 5 - 20240605 - Response - Public Submission - 2024-2025 IPR - Adoption

**COUNCIL OFFICER RESPONSE TO PUBLIC SUBMISSIONS
2024 INTEGRATED PLANNING & REPORTING**

Sub #	Date Submission Received	Location	IP&R Document	Submission Summary	Summarised Council Officer Response	Changes to doc.
1	14 May 2024	Tumbarumba	Long-Term Financial Plan	Given the rejection of the 42% SRV by IPART on 14th May, is now functionally unable to deliver services without incurring losses in excess of \$5 million a year into the foreseeable future. This is after eight consecutive years of losses following the forced amalgamation. There is now no justification for Snowy Valleys Council to continue, or even to proceed glacially towards the Boundaries Commission process without financial plans for the 2 demerged councils.	Special Rate Variation has been removed from Long-Term Financial Plan as per IPART decision on 14 May 2024.	Y
2	22 May 2024	Tumut	Operational Plan	'Other expenses' column of the Operational Budget is confusing - each department has their own 'other expenses'. The community could read these as 'morning and afternoon teas'. civic receptions etc. I feel 'Other expenses' should be clarified in the draft budget.	Council will include an explanation of what other expenses includes.	Y
3	23 May 2024	Tumut	Long-Term Financial Plan	As noted in a previous feedback document, Council's Long Term Financial Plan should be amended to reflect IPART's recent SRV decision. As there is no SRV for 24/25, the second set of projections (that include the SRV increases of 12.5% for 24/25) should be changed to reflect IPART's decision. As it stands, and against the background of IPART's decision, the second set of projections are incorrect. Additionally, the para headed "Rates Income" with the words "Apart from the introduction of an SRV, rates income is restricted to rate pegging as set each financial year by the Independent Pricing & Regulatory Tribunal (IPART). If rate pegging was abolished, Council would have greater flexibility to achieve financial sustainability". To my mind, the last two sentences are along the lines of "if wishes were horses, beggars would ride" . I think Council need to be quite clear to	Special Rate Variation has been removed from Long-Term Financial Plan as per IPART decision on 14 May 2024.	Y

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				readers, whether: IPART is considering this (are they?); or, if IPART is not considering this, get rid of the last two sentences completely as all they seem to amount to is wishful thinking. The text in this document needs to reflect the facts at hand		
4	31 May 2024	Tumut	Fees & Charges	<p>Inflation Rate and Fee Increases - Inflation Rate determined by the Reserve Bank of Australia is currently at 3.6% and dropping. Council has imposed a generalised increased of fees at 4-5%. All fees should be adjusted to suit the current inflation rate of 3.6% increase as per Council's policy. Council's current draft fee schedule does not equitably increase the fees by a single rate and should do so at a fixed rate of inflation of 3.6%. (Note that in past years when inflation was very low, below 1%, Council increase Fees still at the nominal rate of 3%. If fees keep rising greater than that of the cost of living, these fees will not be affordable which will increase crime and poverty within our local government area. Therefore, the current fees are already higher than what they were 10-15 years ago by CPI.)</p>	<p>Item 1 relates to finance as CPI is established by Council LTFF. Any Consumer Price Index Increases relating to statutory fees are mandated by the relevant government agencies and by the relevant statues to which the fees apply.</p>	N
			Fees & Charges	<p>Town Planning – Development Applications - Why have planning proposal fees decreased? (These take a considerable amount of time to assess. Proponents of planning proposals should not be subsidised via other development fees and charges.) It appears any fee or charge related to development; Council is and has always intending to impose the highest fee possible. Why? Are these fees going to subsidise other areas of income? Has a true cost analysis been completed in relation to assessment of development applications etc? If so, shouldn't this be considered in the fee schedule?</p>	<p>Council has adopted the maximum statutory fee under the Environmental Planning and Assessment Regulation 2021 which is permitted by law, as the fees seek to minimize the costs incurred by the community in subsidizing the actual cost of demand driven development assessment. Planning Proposal fees for basic and complex development scenarios have decreased to better reflect the actual costs incurred by Council based on recent rezoning requests, industry standards and to seek to encourage alignment with the National Housing Accord in stimulating development relating primarily to residential housing.</p>	N

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			Fees & Charges	Solid Waste Management - Why are vacant lots in urban areas charged a solid waste fee when they are not using the service? If Brindabella is excluded from this fee and service, then all vacant lots in urban areas should also be excluded. If a lot owner is not paying for this service, then Council needs to ensure only lots who pay for this charge have access to waste vouchers.	Vacant lots in urban areas have the annual Waste Access Charge applied as the land similar to Water and Wastewater Vacant land charges. Services, such as resource recovery centres and water supply systems, are required to be appropriate and available for all urban lots (developed or not) as construction of a dwelling can happen faster than improvements to these facilities. Any vouchers made available are only available to lots paying the waste access charge.	N
			Fees & Charges	New Service/Bin Charges - additional bins Domestic Service Only, why is there no charge for additional bins?	The domestic kerbside collection service requires a standard set of bins therefore additional bins may be added to the standard service. It is assumed the question relates to non-domestic collections. Non-domestic collections can choose any arrangement of bins to suit their business or commercial requirements. Standard multi-bin options are presented, as are all individual bin options.	N
			Fees & Charges	Rural/Urban addressing charges - This is a new charge which should not be introduced. In the past, addressing has been provided as a service during the subdivision process, where Council already gets a fee, and the addressing has been provided by Council within the conditions of a development consent. Since the change in planning staff to that of the current staffing, this addressing stopped. Upon submitting a subdivision plan to Council in the form of a Subdivision Certificate Application (SCA) it is required to complete a new address for each lot within the subdivision. Council also charges for a fee for the SCA, whereby the addressing component should be part of these fees. The SCA fee has already seen considerable increases within the past few years, whereby increasing costs to developments	The introduction of a street addressing fee in 2024/2025 seeks to recover the costs of Council in administering the assessment and application of street addresses on new lots created through applying the Australian Standard. New development and associated addressing is demand driven and accordingly the fee should not be subsidised by the community for private developments. The fee description provides the appropriate mechanism in which the fees will be levied for street addressing applications. The fees for subdivision certificates are a separate application and fee structure to cover the work involved in the assessment and certification of those applications.	N

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				places further demands on the developers and the end products that they produce, which is affordable housing, being not so affordable anymore due to forever increasing development costs.		
			Fess & Charges	Footpath Dining and Display - How are these footpath displays policed to ensure all businesses are complying and paying the appropriate fees? What is the annual income for these and is it necessary to charge this fee at all?	Outdoor dining and displays are regulated under section 68 of the Local Government Act 1993 and also section 138 of the Roads Act 1993. The fee relates to the application made to Council for the provision of outdoor dining and also display of items. An application process is necessary to ensure that businesses are appropriately regulated, ensure community safety and to levy the effective leasing of community land. The draft fees and charges document is not related to compliance activities undertaken by the Council.	N
			Fees & Charges	On-site Sewer Management - Approval to Operate System (each per annum), for all system at any risk are charged \$37. What is this fee for and what does it cover, as there is no justification of this fee? Each operating system that has been installed has paid for an application fee and had its inspections. When a system is due for inspection by Council to check the system, an inspection fee is paid when it is being inspected. Why then is there an annual fee charged when it is being maintained and managed by the land owner and other fees are chargeable upon inspection?	The fee for onsite sewer management seeks to recover the costs incurred by Council in maintaining a register of onsite sewer management systems across the Local Government Area. The register is continually updated to reflect the adopted risk rating and programmed inspection cycle. Separate fees are levied for applications to install an onsite sewer management system and an application to operate which are one off fees at the time of lodgment to cover Council's expected costs in relation to the assessment of those applications.	N