



Valuer  
General

VG20/134

Mr Nathaniel Smith MP  
Chair  
Joint Standing Committee on the Office of the Valuer General  
Parliament of NSW  
Macquarie Street  
SYDNEY NSW 2000

By email: [valuergeneral@parliament.nsw.gov.au](mailto:valuergeneral@parliament.nsw.gov.au)

Dear Mr Smith

**Additional questions and questions on notice - Thirteenth General Meeting with the Valuer General**

I am pleased to provide the Committee with my response to their questions (Tab A).

If you would like any further information, please contact me on 0436 946 309 or [david.parker@ovg.nsw.gov.au](mailto:david.parker@ovg.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink that reads 'Dr Parker'.

Dr David Parker  
**Valuer General**

7 July 2020

# 13<sup>th</sup> General Meeting with the Valuer General

## Questions further to the public hearing

### The Valuation System

#### 1. Continuous Improvement of Land Valuation Methodologies and Quality Assurance Techniques

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The Twelfth General Meeting report recommended (Recommendation 6) continuous review of and valuation methodologies and techniques of quality assuring land values and as well as providing updated information to NSW landholders about improvements to quality assurance and verification programs.

- **In responding to this recommendation, what does the Valuer General consider to be the most significant achievements during the two reporting years under review with regard to improvements in land valuation methods, the quality assurance process and the verification program?**
  - A detailed response to Recommendation 6 is included in the JSC-VG19-524 letter to JSCOVG
  - As a result of the court decision in the case of *Perilya Broken Hill Limited v Valuer-General*, a new methodology for valuing mines was introduced. Valuations made under this new methodology as at 1 July 2019 are now used by all councils for rating.
  - Land valuation methodologies and techniques of quality assuring land values have continued to be reviewed by the Valuer General. Information on these improvements is provided to NSW landholders in the Valuer General's newsletter, annual report and via the website. A new initiative for 2019 saw the publication of a summary of the quality assurance program undertaken for the 1 July 2018 valuation program on the Valuer Generals website. This holistic review of the quality assurance program resulted in significant change, including:
    - a focus on a top-down state-wide risk-based approach to reviewing valuations
    - a consistent approach to recording valuation rationale and improved customer transparency
    - publication of worksheets.

#### 2. Improvement of the Compensation Determination Process

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The Committees Twelfth General Meeting Report recommended (Recommendation 2) a formal consultation process with key acquisition authorities to rank the complexity of negotiations on a risk management basis to prevent unnecessary duplication of effort in delivering compensation for compulsory acquisitions. A Compensation Improvement Group

was established during the 2018-19 reporting period (AR p40) to improve consultation with acquiring authorities.

- **Please outline the critical performance issues to date.**
  - A detailed response to Recommendation 2 is included in the JSC-VG19-524 letter to JSCOVG.
  - A formal consultation process is in place to avoid duplication of effort around determinations and to save contractor costs for compulsory acquisitions.
  - The Valuer General recognises the importance of communicating with acquiring authorities to save costs. Once an acquiring authority reaches agreement with a landowner the Valuer General is informed and stops work immediately.
  
- **Please update the Committee on the efficiencies which have been achieved as a result of the improved monitoring and consultation process?**
  - In 2018/19 the Valuer General stopped work on 82 matters where a final determination of compensation was not required.
  - The contractor fees to complete 82 final determinations would have been \$355,000. However, as work was stopped the actual contractor fees were \$178,000 representing a saving of \$177,000, or 50% of total costs.
  
- **Do you have a strategy for ensuring continuous improvement in relation to the valuations process for compensation in the case of compulsory acquisition?**

The continuous improvement strategy has focused on:

- The Valuer General's involvement with the Centre for Property Acquisition's education program for Acquiring Authorities and alignment of customer surveys.
- Improvements to the timeliness of delivery of determinations, such as:
  - Improved communications with landowners and Acquiring Authorities as to the importance of timely provision of information.
  - Information is required within 7 days of compulsory acquisition.
  - Landowners legal representatives are contacted by the coordinator to emphasise the importance of timely provision of information.
  - The education of landowners' legal representatives and acquiring authorities about timely provision of information.
- Improved communication with acquiring authorities as to the service provided by the Valuer General and associated costs.
- Improved communications with acquiring authorities to remove duplication of effort and save contractor costs (see response to Recommendation 2, above).
- Information sharing between landowners and acquiring authorities.
- Strengthening our relationship with the Crown Solicitor's Office to receive analysis of judicial decisions that impact determinations of compensation, the provision of legal advice and guidance on substratum determinations.

### **3. Overview of NSW Land Values as at 1 July 2019**

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The Valuer General's briefing gave an overview of NSW land values as at 1 July 2019, together with breakdowns of the trends of values for the various land use categories: residential, commercial, industrial and rural land.

- **Did you identify significant differences in the trends between this current reporting period and the two previous years (2017-18 and 2018-19)**
  - Land Value Trends in Major Land Categories:

Land use	2017 LV % Trend	2018 LV % Trend	2019 LV % Trend	Overall Change from 1 July 2016
Residential	14.10%	4.4%	-7.5%	10.19%
Commercial	12.02%	13.9%	2.0%	30.14%
Industrial	11.90%	17.5%	7.3%	41.08%
Rural	16.52%	14.3%	5.2%	40.11%
State total	14.64%	5.9%	-5.4%	14.85%

### Market Trends Between 2016 to 2019

- Each of the four main property categories increased in value since the last rating valuations were made at 1 July 2016. There were differences in value trends through this period with the overall increase for residential lands being significantly less than other categories following residential value falls in 2019.
- Following the 2017 valuation, residential values continued to rise to the market peak in late 2017. Though values fell after the peak, the 1 July 2018 values were still marginally higher than the 1 July 2017 values.
- The fall in values for residential lands continued to 1 July 2019, following the banking royal commission with tighter credit restrictions being imposed on lending and uncertainty leading towards the Federal election.
- The commercial and industrial markets continued to increase through this period but with lower growth recorded in 2019. The main drivers for commercial values were:
  - low commercial vacancy rates
  - increased demand in development areas
  - increased demand for sites with improved access to markets as a result of local infrastructure projects.
- Industrial values were driven by significant increase in demand for large sites close to the Sydney market, close to employment, with good road or rail connections. Industrial values in regional areas also increased as a result of local infrastructure projects.
- The rural market remained strong through this period, despite drought conditions. Rural confidence was strong on the back of continued good commodity prices and farmland aggregations. While values continued to increase in 2019, the value growth was slower, impacted by the severity of drought conditions in some locations.

## Administration and Governance

### 4. Structural and Administrative Changes

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From January 2020, the Office of the Valuer General and Valuation Services merged to become a new operating entity called Valuer General NSW (VG NSW), giving the Valuer General direct oversight over the valuation and land acquisition processes. Administrative support is now located within the Department of Planning, Industry and Environment (DPIE), whereas formerly it was provided by the Department of Finance, Services and Innovation (DFSI).

During the two previous reporting periods (2017-18 and 2018-19), the Office of the Valuer General (OVG) and Valuation Services were based in separate areas of the Department of Finance, Services and Industry (DFSI). Valuation Services was located in Property NSW

(PNSW) and operated the valuation system on behalf of the Valuer General under a service level agreement. From 1 July 2019, the Office of the Valuer General and Valuation Services were transferred to the Department of Planning Industry and Environment.

- **Are all your operations now based in central Sydney? Is this optimal for the future, or would decentralisation offer opportunities for closer collaboration with regional councils and valuation contractors as well as improving outreach to regional communities?**
  - No, operational offices continue to be spread across metropolitan and regional areas including Albury, Bathurst, Coffs Harbour, Newcastle, Orange, Parramatta, Tamworth, Wagga Wagga and Wollongong.
  - Positioning staff in both metropolitan and regional areas ensures valuers have a better understanding of local markets and are well positioned to collaborate with regional councils and stakeholders.

## **5. The General Functions of the Valuer General**

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In his briefing, the Valuer General also stated that: 'The Valuer General is now responsible for people, finance and operations in addition to his statutory functions.'

- **How does the Valuer General intend to manage his more 'hands-on' role in the new organisation and at the same time ensure that the statutory functions of standards setting and protecting the integrity of the valuation system are not compromised?**
  - The change in structure has afforded greater capacity for the Valuer General to ensure alignment of the management structure, clearly define the roles of directors and operations to ensure there is a greater focus on policy matters, standard setting and transparency with an emphasis on outcomes, thus protecting the integrity of the valuation system and VGNSW.

In his briefing, the Valuer General confirmed that the Independence of the Valuer General as a statutory officer remains unchanged in the new structure in that he reports to Parliament. However, The Hon Melinda Pavey MP, Minister for Water, Property and Housing is responsible for the *Valuation of Land Act 1916* and *Land Acquisition (Just Terms Compensation) Act 1991*.

- **How does the Valuer General ensure that public confidence in the independent role of the Valuer General is maintained?**
  - The statutory role and functions of the Valuer General remain unchanged. The Valuer General continues to report to Parliament.
  - The relationship between the Valuer General and the Department of Planning, Industry and Environment (DPIE) is purely administrative.
  - The merger of the Office of the Valuer General and Valuation Services provides the Valuer General, who is ultimately responsible for the valuation of land and compensation systems, direct oversight and governance of operations.
  - Independence is supported by appropriate alignment of delegations.
  - Continued focus on transparency and more direct access to information.

## 6. Annual Report

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As a result of previous recommendation made by this Committee, the Valuer General has been producing a stand-alone annual report providing a comprehensive snapshot of the organisation's activities and achievements during the relevant reporting period. This is in addition to the statutory reporting data which was published in the principal report for the cluster under the previous machinery of government arrangements.

- **Can you please inform the Committee about annual reporting arrangements going forward?**
  - The Valuer General will continue to produce an annual report.
- **Do you envisage any changes to the format and content of the Annual Report?**
  - Any changes will be to ensure the annual report is fit for purpose. At this stage, only minor changes are anticipated.

## 7. Interagency and Machinery of Government Relationships

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The Valuer General briefed the Committee on the key machinery of government and service based relationships of VGNSW. The Valuer General's briefing listed the agencies with which the Valuer General has regular interaction.

- **Could you please clarify how DPIE administratively supports the new entity of VGNSW?**
  - VGNSW is supported administratively by the Housing and Property Group, in the Department of Planning, Industry and Environment cluster. Support services available to VGNSW from DPIE include human resources, IT, finance, legal, governance and risk management.
- **Are there any significant issues arising from your relationships with other agencies and/or key stakeholders, which you would like to elaborate on?**
  - No, our relationships with other agencies and key stakeholders have been collaborative and constructive.

During the two previous reporting periods, there were ongoing consultations with ServiceNSW exploring new opportunities for support in service delivery.

- **Could you please update the Committee on the establishment of the first tier call centre operated on your behalf by ServiceNSW?**
  - In May 2019, a partnership with Service NSW (SNSW) was established in response to the JSCOVG 11<sup>th</sup> General Meeting Recommendation 5 (*The Committee recommends further investigation and development by the Valuer General of customer service initiatives in collaboration with other agencies and organisations and in particular with Service NSW.*)
  - The SNSW tier one call centre commenced on 13 January 2020 and continues to operate. Second tier calls are directed to the VGNSW call centre located in Bathurst.
  - Additional frontline customer services are provided within the SNSW service centres. Customers can access land valuation information and services provided by the Valuer General, in particular land valuation and objection processes via

- NSW digital kiosks with NSW Customer Service Officers available to provide support.
- Regular liaison meetings are held with NSW concerning issues that relate to service standards and the overall customer experience.

As was advised by the Valuer General at the briefing, IPART is responsible for cost setting in relation to notional revenue and the prices which can be charged to councils for the Valuer General's services.

- **Are there any particular issues relating to IPART determinations which you would like to raise with the Committee, either in relation to the two previous performance periods or the new organisation going forward?**
  - As noted in the May 2019 IPART Report, the Valuer General's updated forecasts include a \$1.3 million reduction in labour costs saved by the commissioning of Valnet III. As funding for Valnet III is still subject to approval, IPART funding assumes deferral of proposed expenditure on Valnet III by one year. In the event funding is not forthcoming, further discussion with IPART will be required.

## Customer and Stakeholder Relations

### 8. Privacy and Personal Data Protection

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The Twelfth General Meeting Report recommended (Recommendation 3) publication of regular updates on any privacy issues resulting from the land valuation system. Formal reporting on the management of personal information and privacy was introduced in the 2017-18 Annual Report and the Valuer General's briefing confirmed that annual reporting on this issue will be ongoing. The briefing also advised that the Valuer General's privacy management process is governed by the DPIE Privacy Management Plan and that data protection provisions will be included in licensing agreements with resellers.

- **How many complaints did you receive during the two reporting periods under review; in particular were there any cases which caused a change to privacy management procedures?**
  - A total of nine (9) complaints were received for the period 1-7-18 to 30-6-19 and fourteen (14) complaints for the period 1-7-19 to 30-6-20.
  - In relation to privacy management practices:
    - Advice received from a council relating to a complaint made to them revealed a potential privacy breach in Valnet 2i. As a consequence, system changes were made to reduce council access to information in Valnet 2i.
    - Following a complaint from a landholder who received (via post) other landowners' Notices of Valuation, an investigation revealed a manual process that bundled notices into the same envelope was sent to a regional post office. In regional NSW, it is common for landowners to use the local post office as their mailing address. Changes are being developed for improved sorting and processing of regional notices issued via post.
- **Could you please inform the Committee about the categories of the Valuer General's data which are the subject of licencing agreements and, in particular, where personal data protection provisions are required?**
  - Valuer General NSW supplies wholesale property sales information (PSI), including owners' names, to six (6) commercial clients under a license agreement which expired in January 2016.

- The Property Sales Information Licence Review concluded with a direction by Valuer General NSW to continue the supply of PSI to select clients, in the current format, inclusive of vendor and purchaser details. Procedures are in place to protect owners' privacy through suppression of names when required.
- VGNSW advised the commercial clients that a new agreement will be made for the distribution of sales data, under which purchaser or vendor names will no longer be provided. The agreement will also request that commercial clients delete vendor and purchaser names from their historical data sets.

## Current Issues and Future Initiatives

### 9. Future Vision and Strategy

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In his briefing, the Valuer General advised that VGNSW is working with Norton Crumlin Associates to develop a vision and strategy for the new stand-alone organisation. The Valuer General outlined the values framed in the vision statement including the calibre of the statutory valuation specialists working for the organisation as well as excellence and innovation in data management and provision of customer focussed services.

- **On what basis was Norton Crumlin Associates selected?**
  - For the engagement of professional services, all Government agencies must comply with the Procurement Board Direction (PBD) requiring agencies to source professional services from the Performance and Management Services Scheme (SCM0005 – the “Scheme”). Norton Crumlin are prequalified under this Scheme. Procurement Board Directions are released by the Procurement Board (PB), which is constituted under the Public Works and Procurement Act 1912. This allows an agency to engage a single supplier directly from the Scheme under the Standard Commercial Framework (SCF). To be engaged directly, a supplier must be prequalified as “fully compliant” in the applicable category.
  - Norton Crumlin are fully compliant for the services required and were selected and engaged accordingly.
- **To what extent will the future strategy focus on excellence and innovation in data management and provision of customer services? What are the desired outcomes in those areas?**
  - The future strategy is heavily focused on customer service, particularly, adherence to the NSW Customer Service commitments.
  - Provision of additional data and accessibility to data has been a focus through the publication of worksheets and reports.
  - VGNSW's future strategy for data management is principally focussed on development and implementation of Valnet III. The expanded functionality of Valnet III delivers on VGNSW's commitment to excellence and innovation in data management. Implementation of Valnet III hinges on Treasury funding.
  - Should government seek to introduce a broad-based land tax, Valnet III is crucial to supporting the expanded functions.

### 10. Review of Current Operating Processes

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The Valuer General's briefing concluded with a diagram illustrating a pendulum oscillating between the extremes of 'inflexibility' and 'deference' with VGNSW representing the median point of focus on the independence, transparency and NSW Customer Service Commitments. The Valuer General further commented that in future the organisation would



'pull back' in relation to customer service and that there would be closer adherence to the *Valuation of Land Act 1916*.

- **Please clarify what the future priorities will be concerning adherence to the *Valuation of Land Act 1916*?**
  - Balancing timeliness and legislative compliance with the NSW Government customer service commitments.
  - Providing a tailored evidence-based approach to communications with landholders, in particular, ensuring that responses to landholders are transparent and include all relevant information. For example, in the objection process, this means providing clear advice on the basis of a valid objection, supply of sales information and details of how the component was valued.
  - Educating the public and setting clear expectations.
  
- **Does past performance reporting inform the analysis for the development of the future strategy?**
  - Yes, the development of the future strategy has been focussed on lessons learnt from past reporting. For example, based on measurement and analysis of past performance we have started to make improvements in the following areas:
    - Timeliness for land value objections
    - Timeliness for compensation determinations.
  
- **What, in your view, were the key achievements and challenges emerging from the performance reports of the two reporting periods?**
  - Achievements:
    - New initiatives were implemented in 2019 to improve quality assurance processes and ensure data is transparent, consistent and of high quality. These initiatives comprised:
      - expanding digital delivery of data from contract valuers to include added value of improvement information and digital delivery of supporting information from contractors to explain statistical variances. Data was previously provided by pdf.
      - development of standard benchmark codes and the inclusion of Australian Property Classification codes on the Register of Land Values, to group similar properties and review consistency of values across components, districts and contract areas.
    - Increased compliance with key statistics for valuation quality. For low risk properties, verification of the accuracy of the land values and property data has been increased from every six to every five years.
    - Reduction in costs to valuations from rating and taxing contractors – from 1 March 2019, five year contracts with a further 1 year option (at the discretion of VGNSW) were entered into which are more cost efficient and provide an overall reduction in prices to councils (2.55% lower than previous determinations).
    - Continued above target compliance with internationally recognised valuation quality statistical measures across all local government areas.
    - Verification of land values for all risk categories above target.
  - Challenges:
    - Timeliness in determining objections
    - Timeliness in determining compensation.

- **Do you anticipate any changes in finance and/or performance reporting as a result of the new organisational structure, vision and strategy?**
  - We do not anticipate further changes at this stage, however, remain committed to ensuring reporting is relevant.
  - Previously Valuation Services staff performance reporting was aligned to Property NSW objectives. Under the new structure, staff performance reports will be aligned to the priorities of VGNSW.
  
- **Did you analyse recent trends in objections lodged by landholders and in cases taken to the Land and Environment Court in determining your processes and priorities for the future? If so what were your findings and how will they be reflected going forward?**
  - The Valuer General is a respondent to matters brought to the Land and Environment Court by landholders. The Valuer General will continue to make changes in policy and recommend legislative changes as required in relation to court outcomes/precedents.
  - We received an increased volume of objections during the FY2018-19. These were mainly driven by the issue of land tax assessments as it was a non-general valuation year. We analysed objections in October/November 2019 and the key findings were:
    - Clear correlation between land value movement and objection volume.
    - Clear correlation between objection volume and the average review time per objection.
    - Reduced number of cases taken to the Land and Environment Court by landholders.
  - We have changed how we communicate with landholders to provide more information on how a land value has been made which has contributed to reduced objection volumes. We have:
    - Included property trend information on the Valuer General website to allow landholders to understand how their land value movement compares to others.
    - Rebranded the “Objection Kit” to “Information Kit”. This has shifted the focus to providing information that assists the landholders to understand the valuation process.
    - Included the Benchmark component report and worksheet, where available, to better explain how their land value was determined.
    - Substantially amended the Land Value Review guide, Objection Form and Objection Checklist to provide clear examples of information required to lodge an objection.
    - Set up a dedicated team of valuers to focus on the quality of objection outcomes.
    - Provided training to objection contractors so they become more skilled at addressing owners concerns in their reports.
    - Simplified objection reports, using plain English and rearranging in a format that prioritises the information relevant to landholders.
    - Reviewed and changed our objection procurement program, increasing our pool of valuers, which will improve timeliness.
  - Since 2017 we have provided a preliminary objection report to the landholder that allows for review and feedback before the objection is finalised. After we issue the preliminary objection report, landholders can have an informal conference with a valuer to discuss the report and resolve any concerns.

- Our future priorities will continue to focus on optimising processes to provide clear and concise information to the landholders, with the aim of reducing both the objection numbers and average time to review.
- **How will the new vision and strategy affect delivery of services under the *Land Acquisition (Just Terms Compensation) Act*?**
  - The new vision and strategy emphasise a commitment to improve timeliness for the issue of determinations of compensation.
  - In an effort to deliver on this commitment valuations are increasingly being undertaken inhouse, with a focus on further process developments to enable improved timeliness.

# QON's

## Land valuation frequency

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### Extract from Transcript:

The CHAIR: How does that compare to other jurisdictions in relation to its arrangements for issuing new land valuations for rating or taxing?

Mr CHUDLEIGH: They vary considerably. A number of them are on annual and others are on a various year proposal. I do not have the exact figures in front of me but I can advise you on notice.

### Response to the Question on Notice:

The issue of valuations to the public and use of the valuations by rating and taxing authorities varies in all Australian jurisdictions. As noted in the response this variation ranges from annual to a minimum number of years. There are also differences in the frequency of how individual states or territories issue valuations for land tax purposes compared to the frequency of valuations for rating purposes. The following table describes the current frequency of valuations for rating and taxing for each Australian jurisdiction.

State/Territory	Frequency of valuation
New South Wales	<ul style="list-style-type: none"><li>• Annual for Land tax</li><li>• At least once every 3 years for council rating</li></ul>
Victoria	<ul style="list-style-type: none"><li>• Annual for land tax and council rating</li></ul>
Queensland	<ul style="list-style-type: none"><li>• Annual for land tax and council rating</li></ul>
South Australia	<ul style="list-style-type: none"><li>• At least every 5 years for land tax and council rating. However currently revalued annually</li></ul>
Western Australia	<ul style="list-style-type: none"><li>• Annual for land tax</li><li>• Every 3 to 6 years for council rating</li></ul>
Northern Territory	<ul style="list-style-type: none"><li>• At least every 3 years for council rating. There is no land tax in Northern Territory</li></ul>
Tasmania	<ul style="list-style-type: none"><li>• At least every 7 years for land tax and council rating with;<ul style="list-style-type: none"><li>○ adjustment factor for land tax annually</li><li>○ adjustment factor for council rating at least every 2 years</li></ul></li></ul>
Australian Capital Territory	<ul style="list-style-type: none"><li>• Annual for both land tax and rating</li></ul>

## Bushfire report

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### Extract from Transcript:

The Hon. SHAOQUETT MOSELMANE: Do we have statistics as to the number of properties that have been impacted.

Mr CHUDLEIGH: We do.

Dr PARKER: We do. It was in the bushfire report. I do not think we brought a copy with us. No.

The Hon. SHAOQUETT MOSELMANE: Are they mainly in those four council areas?

Dr PARKER: No. They are spread more widely. As the Deputy Valuer General said, you can get significant impact in some council areas. In other council areas there might just be half a dozen properties affected. It can be quite varied. We can take that on notice if you need. It is in the bushfire report.

### Response to Question on Notice:

There were 50 council areas identified as natural disaster areas in NSW following the summer bushfires of 2019/2020. The Valuer General offered to issue a new 1 July 2020 land value for each of these Councils.

The Rural Fire Service recorded 38,012 properties as damaged or destroyed by the fires in NSW. Not all council areas identified as natural disaster areas had properties recorded as damaged or destroyed.

As at the date of the hearing, four Councils in fire affected areas had accepted the Valuer General's offer to issue a new 1 July 2020 land value and five had formally declined.

As of 7<sup>th</sup> July 2020, seven councils have now formally accepted the offer and 33 have declined. Responses from 10 councils are outstanding.

The number of fire affected properties in each council declared a natural disaster area are provided in the following table. The table also identifies which councils have accepted an offer to receive 1 July 2020 land values.

Councils declared natural disaster areas in NSW	Fire affected properties recorded by the Rural Fire Service*	Total number of properties in LGA	Percentage affected	Offer of 1 July 2020 land values
ARMIDALE REGIONAL COUNCIL	302	12,717	2.4%	Declined
BALLINA SHIRE COUNCIL	10	15,936	0.1%	Declined
BEGA VALLEY SHIRE COUNCIL	5,312	18,979	28.0%	Not responded
BELLINGEN SHIRE COUNCIL	1	6,195	0.02%	Declined
BLUE MOUNTAINS CITY COUNCIL	681	37,079	1.8%	Declined

<b>BYRON SHIRE COUNCIL</b>	136	13,745	1.0%	Declined
<b>CENTRAL COAST COUNCIL</b>	521	126,436	0.4%	Declined
<b>CESSNOCK CITY COUNCIL</b>	860	26,118	3.3%	Declined
<b>CLARENCE VALLEY COUNCIL</b>	2,007	25,986	7.7%	Declined
<b>COFFS HARBOUR CITY COUNCIL</b>	169	28,321	0.6%	Accepted
<b>COOTAMUNDRA-GUNDAGAI REGIONAL COUNCIL</b>	17	6,621	0.3%	Not responded
<b>DUNGOG SHIRE COUNCIL</b>	No RFS data available at time of report	5,223	NA	Declined
<b>EUROBODALLA SHIRE COUNCIL</b>	5,031	24,512	20.5%	Declined
<b>GLEN INNES SEVERN SHIRE COUNCIL</b>	399	5,334	7.5%	Not responded
<b>GOULBURN MULWAREE COUNCIL</b>	37	15,829	0.2%	Declined
<b>GREATER HUME SHIRE COUNCIL</b>	140	6,909	2.0%	Accepted
<b>GWYDIR SHIRE COUNCIL</b>	No RFS data available at time of report	3,260	NA	Declined
<b>HAWKESBURY CITY COUNCIL</b>	1,321	25,027	5.3%	Not responded
<b>INVERELL SHIRE COUNCIL</b>	19	8,711	0.2%	Declined
<b>KEMPSEY SHIRE COUNCIL</b>	1,086	14,495	7.5%	Declined
<b>KU-RING-GAI COUNCIL</b>	No RFS data available at time of report	33,623	NA	Not responded
<b>KYOGLE COUNCIL</b>	35	5,357	0.7%	Declined
<b>LAKE MACQUARIE COUNCIL</b>	No RFS data available at time of report	81,831	NA	Declined
<b>LISMORE CITY COUNCIL</b>	72	18,291	0.4%	Declined
<b>LITHGOW CITY COUNCIL</b>	1,337	11,904	11.2%	Accepted
<b>MID-COAST COUNCIL</b>	2,476	51,645	4.8%	Not responded
<b>MID-WESTERN REGIONAL COUNCIL</b>	159	14,129	1.1%	Declined
<b>MUSWELLBROOK SHIRE COUNCIL</b>	No RFS data available at time of report	7,630	NA	Declined
<b>NAMBUCCA SHIRE COUNCIL</b>	642	9,466	6.8%	Declined

<b>NARRABRI SHIRE COUNCIL</b>	No RFS data available at time of report	7,012	NA	Accepted
<b>OBERON COUNCIL</b>	86	3,806	2.3%	Accepted
<b>PENRITH COUNCIL</b>	No RFS data available at time of report	66,336	NA	Declined
<b>PORT MACQUARIE-HASTINGS COUNCIL</b>	555	32,656	1.7%	Declined
<b>QUEANBEYAN-PALERANG REGIONAL COUNCIL</b>	892	22,952	3.9%	Declined
<b>RICHMOND VALLEY COUNCIL</b>	552	10,347	5.3%	Declined
<b>SHOALHAVEN CITY COUNCIL</b>	5,033	58,981	8.5%	Declined
<b>SINGLETON COUNCIL</b>	188	10,698	1.8%	Declined
<b>SNOWY MONARO REGIONAL COUNCIL</b>	616	13,883	4.4%	Not responded
<b>SNOWY VALLEYS COUNCIL</b>	3,768	9,133	41.3%	Declined
<b>SUTHERLAND COUNCIL</b>	No RFS data available at time of report	61,304	NA	Declined
<b>TAMWORTH REGIONAL COUNCIL</b>	No RFS data available at time of report	27,930	NA	Declined
<b>TENTERFIELD SHIRE COUNCIL</b>	518	5,171	10.0%	Accepted
<b>TWEED SHIRE COUNCIL</b>	16	31,204	0.1%	Declined
<b>UPPER HUNTER SHIRE COUNCIL</b>	No RFS data available at time of report	7,869	NA	Declined
<b>UPPER LACHLAN SHIRE COUNCIL</b>	55	6,560	0.8%	Declined
<b>URALLA SHIRE COUNCIL</b>	No RFS data available at time of report	3,107	NA	Not responded
<b>WAGGA WAGGA CITY COUNCIL</b>	45	28,036	0.2%	Not responded
<b>WALCHA COUNCIL</b>	117	1,855	6.3%	Accepted
<b>WINGECARRIBEE SHIRE COUNCIL</b>	1,360	23,966	5.7%	Declined
<b>WOLLONDILLY SHIRE COUNCIL</b>	1,441	18,905	7.6%	Not responded
<b>Total</b>	<b>38,012</b>	<b>1,100,605</b>	<b>3.5%</b>	

\*NSW Rural Fire Service (2020), Impact Assessment Current Financial Year, NSW, data file viewed 20 March 2020, updated 3 March 2020.