Independent Pricing and Regulatory Tribunal | NSW

Review of Valuer General prices to local government 2025

Draft Report

April 2025

Local Government »

Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Tribunal Members

The Tribunal members for this review are:

Carmel Donnelly PSM, Chair
Dr Darryl Biggar
Jonathan Coppel
Sharon Henrick

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Invitation for submissions

IPART invites comment on this document and encourages all interested parties to provide submissions addressing the matters discussed.

Submissions are due by Sunday, 4 May 2025

We prefer to receive them electronically via our online submission form.

You can also send comments by mail to:

Review of Valuer General prices to local government 2025-2031
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop, Sydney NSW 1240

If you require assistance to make a submission (for example, if you would like to make a verbal submission) please contact one of the staff members listed above.

Late submissions may not be accepted at the discretion of the Tribunal. Our normal practice is to make submissions publicly available on our website as soon as possible after the closing date for submissions. If you wish to view copies of submissions but do not have access to the website, you can make alternative arrangements by telephoning one of the staff members listed above.

We may decide not to publish a submission, for example, if we consider it contains offensive or potentially defamatory information. We generally do not publish sensitive information. If your submission contains information that you do not wish to be publicly disclosed, please let us know when you make the submission. However, it could be disclosed under the *Government Information (Public Access) Act 2009* (NSW) or the *Independent Pricing and Regulatory Tribunal Act 1992* (NSW), or where otherwise required by law.

If you would like further information on making a submission, IPART's submission policy is available on our website.

The Independent Pricing and Regulatory Tribunal

IPART's independence is underpinned by an Act of Parliament. Further information on IPART can be obtained from IPART's website.

The Contents

1 Report Summary

IPART sets the maximum price that the Valuer General can charge councils for providing land valuation services. Councils use the land valuations to set rates. Our review aims to ensure that the Valuer General can recover the efficient costs of providing its services, and that councils pay only what is appropriate for the services they receive.

Our draft decision is to set a single maximum price of $7.86 per valuation across all councils. This will apply, adjusted for inflation, for 4 years from 1 July 2025 to 30 June 2029 (the 2025 determination period).

This report outlines our draft decisions and explains how and why we reached them.

1.1 Our draft prices are lower than the Valuer General proposed

We have assessed the proposal from the Valuer General and made draft decisions to:

- establish a determination period of 4 years
- allocate 30.2% of the Valuer General's efficient costs to local councils
- set a revenue requirement that reflects the Valuer General's efficient costs of $286.6 million
- adopt a postage stamp (flat fee) pricing methodology with a price of $7.86 per valuation rather than retaining the existing 4 distinct zone prices (Table 1.1)
- increase the price by Consumer Price Index (CPI) each year.

Table 1.1 The current, proposed and draft decision prices ($2024-25)

	Current price $/Valuation	Proposed price $/valuation	Impact on council bills	Draft price $/valuation	Impact on council bills
Zone 1 - Country	9.16	11.62	26.8%	**7.86**	**-14.2%**
Zone 2 – Coastal	7.80	10.80	38.4%	**7.86**	**0.8%**
Zone 3 – Metro	7.20	9.44	31.1%	**7.86**	**9.2%**
Zone 4 - Sydney City	14.89	18.09	21.5%	**7.86**	**-47.2%**
Average (weighted)	7.91	10.45	32.0%	**7.86**	**-0.7%**

Source: IPART analysis.

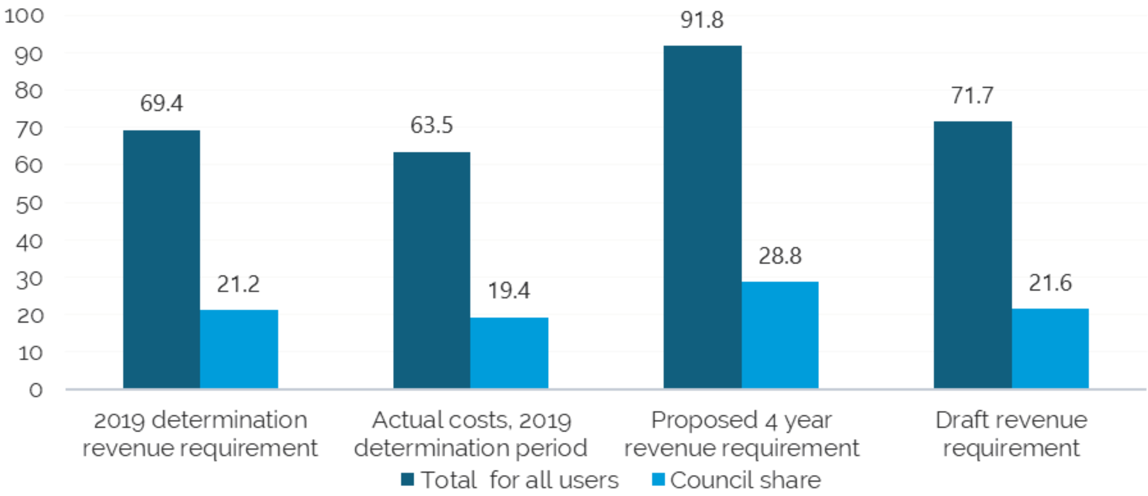
Impact of draft price on councils and ratepayers

A single price means that country councils and Sydney City would experience a bill decrease. Coastal and metropolitan councils would experience an increase in bills, although this would be a smaller increase than that proposed by the Valuer General. The impact on ratepayers would be limited, as land valuation costs represent only a small portion of council expenses.

Impact on the Valuer General

Our total draft revenue requirement is $2.3 million per year more than the Valuer General's 2019 determination revenue requirement (Figure 1.1). Our draft determination allocates $7.2 million less each year to councils share compared to the Valuer General's proposal.

Figure 1.1 Current determination period, proposed and draft decision revenue requirement per year, ($ million, $2024-25)



Note: The actual costs are estimated, based on the Valuer General's reported actual operating expenditure and depreciation costs.
Source: IPART analysis.

1.2 The Valuer General proposed increased revenue to be funded by higher charges to councils

The Valuer General has proposed:

- 6-year determination period of 2025-26 to 2030-31
- an increased revenue requirement, driven by higher estimated costs, over 6 years of 34.8% to $554.14 million
- apportioning 31.3% of its operating costs to local councils
- maintaining the existing 4 pricing zones
- raising the maximum prices that it can charge councils for land valuation services (Table 1.2).

Table 1.2 Valuer General's proposed prices ($2024-25)

Zone	2024-25 Price	Proposed 2025-26	Difference	Difference (%)
Country	9.16	11.62	2.46	27%
Coastal	7.80	10.80	3.00	38%
Metro	7.20	9.44	2.24	31%
Sydney City	14.89	18.09	3.20	21%

Source: Valuer General, Pricing Proposal, p 58, IPART Analysis.

The Valuer General is expecting its costs to increase across a number of areas such as labour, mass valuation contracts, objections, and postage.

After the 2019 determination, the Valuer General has made the following operational changes:

- A hybrid delivery model, where approximately half of mass valuations and objections are completed in-house rather than being contracted out.
- Reverting the general valuation cycle back to issuing one-third of valuations to local government areas each year, instead of once every 3 years to all local government areas.

A summary of the Valuer General's proposal is in Chapter 2 of this report; the complete proposal can be found on our website.

1.3 We have considered all feedback received from stakeholders

As part of this review, we published the Terms of Reference for the review and a 'Call for submissions' paper and invited feedback from interested stakeholders. We have identified the following key themes in the 45 submissions[a] we received:

- The proposed cost increases lack efficiency and value for money.
- There are potential financial impacts for councils and ratepayers if the Valuer General's proposed prices are implemented.
- The proposed cost allocation is inequitable for councils, and all users of valuation services should be charged more equitably.
- Councils should bear a smaller share of the cost of objections, if at all.

We also received mixed feedback from stakeholders on the 4-zone pricing framework, the Valuer General's proposed hybrid method of delivery, and the quality of valuations.

We have considered all stakeholder feedback in reaching our draft decisions. We welcome stakeholder feedback on this draft report before finalising our Final Report and determination.

More details on the submissions received can be found in Chapter 3 of this report.

1.4 IPART's assessment

We have relied on confidential information supplied by the Valuer General and stakeholders in arriving at our draft decisions. We are unable to publish this data which was supplied to IPART in confidence.

[a] We received 15 submissions to the draft Terms of Reference and 30 submissions on our Call to Submissions Paper.

IPART has been asked to establish the maximum prices that the Valuer General can charge local councils for monopoly services[b] for 6 years.[1] Under our Terms of Reference received from the Premier on 16 August 2024 we are to consider:

- and identify the Valuer General's efficient costs of providing the monopoly services
- market-based factors over the determination period
- appropriate interim period adjustments
- the efficient allocation of costs between users of monopoly services
- any other relevant factors.

Land Valuation Services

For the Valuer General to deliver the monopoly services, it is required to undertake *Land Valuation Services*. These include:

- rating and taxing valuations
- objections
- customer experience and land data.

1.4.1 Our assessment methodology

We assessed the pricing proposal submitted by the Valuer General in September 2024[c]. This contained the Valuer General's proposed expenditure for providing land valuation services, its allocation of costs between users, and its pricing structure. In making our assessment, we considered the feedback from stakeholders. Additionally, we engaged an independent expenditure consultant, The Centre for International Economics (The CIE) to provide advice on the efficient costs of land valuation services. Our expenditure consultant's assessment of the Valuer General's pricing proposal can be viewed on our website.

Our methodology for setting prices is as follows:

Our draft decision is to determine prices for a shorter period of 4 years

We have assessed that there is considerable uncertainty regarding land valuation and objection costs for the Valuer General over the referral period of 6 years. The Valuer General is establishing a new operational model and will re-tender mass valuation contracts. Our draft decision is for a 4-year pricing determination.

[b] That is, the service of furnishing valuation lists and supplementary lists under Part 5 of the Valuation of Land Act 1916 by the Valuer-General to councils. This investigation has been undertaken under sections 12(1) and (3) of the IPART Act.

[c] Updated versions of this proposal were provided in October and the data supporting the proposal was updated in November 2024 to correct an error in labour calculations

4 years

Over the next 4 years, the Valuer General will be able to establish the new operational model, undertake external tenders and achieve efficiencies.

The Valuer General will also be able to collect additional information on objections and other users of valuation data.

Prior to the end of the 4-year determination, IPART will need to write to the Premier seeking new Terms of Reference with a new referral period.

Our discussion on the length of the determination can be found in Chapter 4 of this report.

Our draft efficient operating costs are 16% lower than the Valuer General's proposal

Our draft decision for efficient operating costs is $63.2 million per year, or $253 million for the provision of land valuation services over the 4-year determination period. Our efficient costs for rating and taxing valuations, customer experience and the Office of the CEO/VG are lower than the Valuer General's proposed costs. We have increased objection costs compared to the Valuer General's proposed costs. Overall, our efficient costs are 16% lower than the costs proposed by the Valuer General.

$63.2m

Forecast efficient costs are based on:

- Average costs over the last 6 years
- Reasonable changes in costs
- Growth in valuations
- 5% increase in mass valuation costs

Our discussion on the Valuer General's efficient costs is in Chapter 5 of this report.

Our draft decision is to allocate a slightly lower share of costs to councils

Costs have been distributed among users following the 'impactor pays' principle. We propose that users are charged based on the extent to which they contribute to the necessity of incurring the cost. However, minor users of the valuation data have been excluded from this cost allocation.

30.2%

Our draft decision is that 30.2% of the Valuer General's efficient costs are allocated to councils. Our proposed allocation of individual operating cost categories is generally the same as the Valuer General.

However, a larger share of efficient costs is apportioned at a lower rate to councils. This has resulted in our overall allocation of 30.2% being lower than the 31.3% proposed by the Valuer General.

Chapter 6 outlines the methodology we applied in reaching our draft decision on the allocation of costs to councils.

Our draft decision is for councils to contribute 25% less revenue than under the Valuer General's proposal

We have assessed that the Valuer General's required revenue for providing land valuation services over the next 4 years will be $287 million, of which $86.4 million will be recovered from councils.

The revenue requirement includes a reduction of $2.8 million over the determination period to ensure that councils are not overcharged for depreciation. This has resulted in a $0.25 per valuation reduction in the price paid by councils.

The total revenue requirement is 25% lower than proposed by the Valuer General over the 4-year determination.

$86.4m

Over 4 years

The councils' share of required revenue has been adjusted for unused capital expenditure, revenue from minor users, increases in the number of valuations, and working capital.

Chapter 7 discusses our methodology for determining the Valuer General's required revenue.

Our draft decision is a single price per valuation for all councils

We have reviewed the existing 4-zone pricing structure that the Valuer General proposed to retain. Changes to the Valuer General's operational model have reduced the cost reflectivity of the 4-zones. We investigated a risk rated pricing structure which more closely reflects the costs of carrying out land valuations, but further information is required to develop such a model. We propose that a postage stamp model with a flat price across the state is the most appropriate pricing option at this time.

$7.86

Our draft decision is to apply a flat postage stamp rate of $7.86 ($2024-25) per valuation for all councils.

Chapter 8 discusses our draft pricing decisions and its impact on councils and ratepayers.

1.5 Draft Decisions

We have made the following Draft Decisions:

Draft Decisions

1.	To set prices for a 4-year period from 1 July 2025 to 30 June 2029.	19
2.	We have assessed that the Valuer General's efficient operating costs for providing valuation services over 4-years is $286.3 million.	22
3.	To allocate 30.2% of the Valuer General's efficient operating costs to councils. This is based on allocating to councils	34
	a. 25% of rating and taxing valuation costs	34
	b. 50% of objection costs	34
	c. 50% of Customer experience and land data costs	34
	d. 99.7% of postage costs	34
	e. 100% of graphic costs	34
	f. 0% of unregulated costs	34
	g. 100% of IPART's charge for this review.	34
4.	To set a total revenue requirement for valuation services provided to all users of $286.6 million which is shown in Table 7.1 and comprises:	43
	a. an efficient operating expenditure allowance of $286.3 million	43
	b. a depreciation allowance of -$6.6 million	43
	c. a return on the Regulatory Asset Base of -$2.6 million	43
	d. a working capital allowance of $9.6 million	43
5.	To set a revenue requirement to be recovered from councils of $86.4 million, which is shown in Table 7.2 and comprises	43
	a. an efficient operating expenditure allowance of $86.4 million	43
	b. a depreciation allowance of -$2.0 million	43
	c. a return on the Regulatory Asset Base of -$0.8 million	43
	d. a working capital allowance of $2.9 million	43
6.	To subtract $0.08 million for income from minor users from councils' share of the revenue requirement before we set prices, which is shown in Table 7.3.	43
7.	To calculate the total revenue requirement by:	43
	a. adopting a building block method with a Regulatory Asset Base, simplified by incorporating the tax allowance into the return on assets component of the revenue requirement.	43
	b. compensating councils for previously overpaid depreciation in prices, with one third repaid over the 4-year determination period.	43
	c. setting the opening Regulatory Asset Base to be -$20.1 million and the closing Regulatory Asset Base to be -$13.4 million, which is shown in Table 7.5.	43
	d. using a weighted average cost of capital (WACC) of 3.8% (pre-tax real) to calculate the return on the Regulatory Asset Base and 6.7% (pre-tax nominal) to calculate the working capital allowance.	43
8.	To set a price for all councils of $7.86 ($2024-25) per valuation from 1 July 2025 (to be adjusted for inflation).	53
9.	To increase the price by CPI on 1 July each year for the remainder of the determination period.	53

We have made the following recommendations:

Recommendations

1.	The Valuer General enhances transparency by gathering information on the specific purposes for which land valuation data is used, alongside any associated revenue generated and costs incurred.	42

We are seeking comment on the following:

Seek Comment

1.	Should IPART change the way it allocates costs to other users of land valuation data?	41
2.	Implementing a risk-based pricing structure in a future determination would require the Valuer General to take steps to capture unit mass valuation costs by risk rating. Would you support this and what are the advantages and disadvantages of this approach?	55
3.	We invite councils to provide information on their experiences with recent changes to services provided for Commonwealth land valuations.	61
4.	Given the rising cost of objections, which flows through to prices paid by councils, should the Valuer General investigate ways to reduce the number of objections?	62

1.6 We want to hear your views on our draft decisions

Your input is valuable to us as we undertake this review. We are now seeking feedback on our draft decisions and questions above. To have your say, you can provide a submission to this Draft Report by 4 May 2025.

Have your say

Your input is critical to our review process.

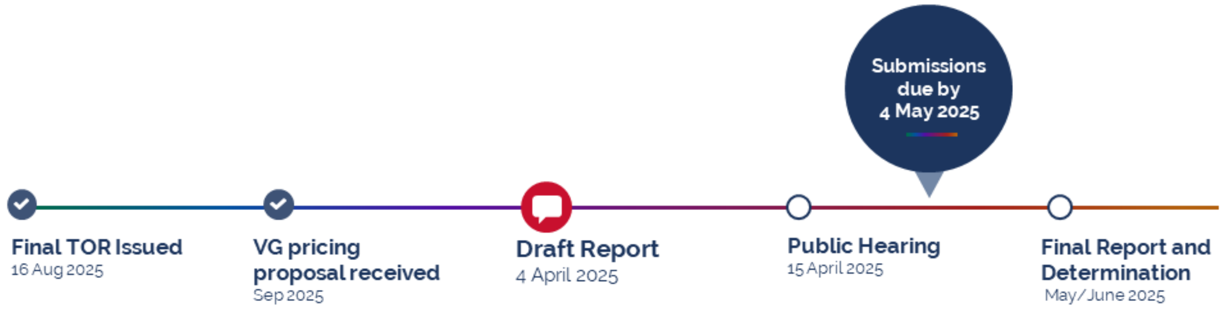
You can get involved by submitting feedback to the review.

Submit feedback »

Figure 1.2 provides our timeline. We encourage you to provide feedback on our Draft Report and Draft Determination here. Our consultation closes on 4 May 2025.

We will consider all stakeholder feedback, as well as input from our independent experts and our own analysis, before publishing our Final Report with our final decisions.

Figure 1.2 Timeline for the Review



2 Valuer General's pricing proposal

The Valuer General's pricing proposal[d] was submitted to IPART in September 2024 and the Valuer General updated underlying (labour) assumptions in November.[e] The proposal contains the Valuer General's proposed costs, cost allocation between users, and pricing.

Table 2.1 shows the Valuer General's proposed prices for councils:

Table 2.1 Valuer General's proposed prices for councils in real terms ($2024-25)

Council Zone	2019-20 to 2024-25 Price	2025-26 to 2030-31 Price	Difference ($)	Difference (%)
Country	9.16	11.62	2.46	27%
Coastal	7.80	10.80	3.00	38%
Metro	7.20	9.44	2.24	31%
Sydney City	14.89	18.09	3.20	21%

Note: The Valuer General has updated their proposed costs. See section 8.1 of this report.
Source: Valuer General, Pricing Proposal, p 58.

2.1 The Valuer General has proposed a 35% increase in revenue requirement

The Valuer General proposed a 34.8% increase in revenue requirement to $554.14 million, driven by higher estimated costs over 6-years. Operating expenses are the main driver of the increase accounting for 94% of the proposed revenue requirement. The Valuer General's proposal forecast increased operating expenditure over the 6-year referral period of $522.9 million.

The Valuer General's proposal used a cost-plus margin approach for this determination. In addition to operating expenditure the Valuer General forecast depreciation costs of $10.58 million over the 6-year referral period, and an operating margin of 3.8%.

The Valuer General's higher projected costs do not result from greater demand for land valuations from councils. Increased costs are due to:

- **A predicted rise in external contract costs:** The Valuer General expects that significant cost increases will be experienced in the upcoming retendering of mass valuation contracts. Eleven of the current 19 contract areas will be outsourced to external valuation firms.
- **An increase in objection costs**: The Valuer General has advised that the cost of objections has risen with demand for valuation services exceeding supply.
- **An increased reliance on in-house valuations**: The restructure in operations to a hybrid model will result in an increase in operating costs. The Valuer General expects that a greater percentage of valuations being conducted internally will require higher staffing levels.

[d] The VG's pricing proposal is supported by independent consultancy firm Scyne Advisory assisted in the delivery of the building of the activity based costing model.

[e] Valuer General Pricing Proposal

- **Greater per capita overhead costs:** The Valuer General proposes large increases in corporate overhead charges over the determination period, including ICT costs. These are costs that are required from their overarching Department (DPHI).

2.1.1 The Valuer General proposed a new allocation of costs for councils

The Valuer General allocated costs between Revenue NSW and councils as shown in Table 2.2. It also allocated 99.7% of postage and 100% of graphic costs to councils, consistent with previous determinations.

Table 2.2 Valuer General's proposed apportionment between users

Service Delivery Area	Allocation	Allocation methodology
Rating and Taxing	25.0% to councils 75.0% to Revenue NSW	Based on the number of valuations issued to councils compared to Revenue NSW each year. Methodology is consistent with the last determination.
Objections	50.2% to councils 49.8% to Revenue NSW	Based on the 3-year historical average of general objections (related to councils) proportionate to land tax objections (related to Revenue NSW). Methodology is consistent with the last determination over a shorter period. Split also differs due to a change in objections mix.
Customer Experience and Land Data	50.0% to councils 50.0% to Revenue NSW	Customer Experience and Land Data team undertakes supplementary valuations, with effort equally attributable to councils and Revenue NSW. Methodology is consistent with the last determination.

Note: The Valuer General allocated indirect costs, such as corporate support costs, to these direct cost categories before apportioning total costs between users.

Source: Valuer General, Pricing Proposal, p 45.

2.1.2 The Valuer General proposed continuing the pricing structure based on 4 geographic zones

The Valuer General's proposed differential pricing model charges a single price per property valuation within each of the 4 geographic zones.

The geographic pricing zones established in 2019 were designed to reflect the cost of mass valuation contract prices at the time for country, coastal and metropolitan zones and Sydney City. Councils were then charged the price for the zone they were in.

2.1.3 The Valuer General proposal is for a 6-year determination period

The Valuer General proposed a 6-year determination to capture 2 complete 3-year valuation cycles.

2.1.4 Value NSW has made operational changes since the last determination period

Since the last determination, Value NSW (previously known as Valuation Services) has changed its operational model. These changes include:

- Adopting a hybrid delivery model where approximately 55% of mass valuations and 50% of objections will be completed internally or 'in-house'. Previously these services were provided by external contractors.
- Valuations are issued to approximately one-third of local government areas each year, rather than issuing all valuations to all local government areas once every 3 years.

2.1.5 The Valuer General spent less than expected in the previous determination period

Historical operating expenditure was underspent by 4.8% over the determination period. This was largely driven by contingencies in mass valuation contracts that were not realised and due to the transition to a hybrid service delivery approach for mass valuation services.

Historical capital expenditure was 35.3% underspent over the determination period. This was primarily due to delays in the implementation of Val IQ, a new information and communications solution designed to deliver business processes for land valuations. These delays were experienced due to external hurdles in seeking funding and approval for the project's implementation.

2.1.6 The Valuer General has aimed to improve service delivery

Value NSW have sought to improve the quality and efficiency of its services. Through the current determination and into this determination, they have made several changes to their process and system. These initiatives include:

- revised workforce structure and staff engagement
- inhouse valuations and valuation process changes
- redistribution of general valuation notices
- modified service delivery and access to information
- objections process review
- improving public education and customer experience.

2.2 The Valuer General oversees the land valuation system

The *Valuation of Land Act 1916* (the VOL Act) established the Valuer General as the independent statutory authority responsible for the overall management of the land valuation system in NSW.

The role of the Valuer General is to:[2]

- exercise functions with respect to the valuation of land in the State, and
- ensure the integrity of valuations, and
- to be the custodian of the Register of Land Values.

Value NSW, through delegation, completes day to day operations on behalf of the Valuer General. In this report, we use the term Value NSW to refer to the tasks undertaken to meet the Valuer General's obligations under the VOL Act.

2.2.1 The Valuer General offers a range of valuation services to NSW

The Valuer General provides valuation services to councils for rating purposes. It also provides other land valuation services which are outside the scope of this review. The full range of valuation services provided by the Valuer General includes:

- land values for rating and taxing purposes
- the determination of compensation following the compulsory acquisition of land
- an objections and appeals process against valuations
- specialist/private valuations and property advice to government
- valuations completed by NSW Valuer General.

2.2.2 Valuations for Rating and Taxing purposes

The land valuation system helps councils determine what rates to levy in NSW under the *Local Government Act 1993 (NSW)* and in the determination of land tax raised by Revenue NSW.[f] Councils must use the Valuer General to obtain land valuations for rating purposes. The Valuer General charges councils for the land valuation service it provides.

Value NSW uses a mass valuation approach for rating and taxing valuations. Most land valuations are currently performed under contract. Properties with similar attributes such as location, size and amenity are grouped into 'components'. Representative properties are inspected and verified in each component and benchmark properties are selected to monitor for price changes. Price changes are then applied across all the properties in each component.

Land valuations provided to councils are used to charge rates which fund infrastructure and services in their local government areas. Rates income represents around one third of NSW councils' combined total income. Increases in land values change the distribution of rates among ratepayers but not the total amount raised by councils.

Members of the public can search land values for free on the Valuer General's website and request certificates of land value.

[f] Section 48 of the *Valuation of Land Act* 1916 (the Act) requires the Valuer General to provide valuations to councils at least once every three years and to Revenue NSW annually.

3 What we heard from stakeholders

We sought stakeholder feedback for this review on two occasions. We asked for submissions to our draft Terms of Reference and in response to our Call for Submissions Paper – which we published along with the Valuer General's pricing proposal. As part of our consultation process, we also held meetings with other users of valuation services, councils and valuation companies.

In total, we received 45 submissions from a mix of stakeholders including members of the public, local councils, Local Government NSW (LGNSW) and the NSW Revenue Professionals Inc (NSWRP).[g] Ten submissions were marked as confidential.[h]

3.1 Stakeholders were generally unsupportive of the Valuer General's proposed cost increases

3.1.1 Stakeholders argued that the Valuer General's proposed costs do not represent value

Many stakeholders (18 submissions) indicated that they did not see the Valuer General's proposal as representative of good value and did not support the level of price increase sought by the Valuer General. Some submissions pointed to the lack of any demonstrated improvements in efficiencies over the determination period. Stakeholders felt that the Valuer General's proposed price increases were unsubstantiated. These stakeholders disagreed with the cost increases proposed by the Valuer General.

3.1.2 Submissions cited that the proposal lacked efficiency and cost savings

- Four councils expressed concerns that the Valuer General has not identified where it has reduced costs or gained efficiency.[3]
- Four submissions referred to an article in the Australian Financial Review where Value NSW representatives spoke of $16 million in savings over the determination period, which they considered are not evidenced in the proposal.[i][4]
- NSWRP suggested that IPART's pricing determination should incorporate an efficiency factor.[5]
- Ten respondents felt that AI and innovation should result in a decline in manual processing and/or future efficiency gains. These submissions expected that improvements should result from increased application of AI and technology in the valuation process.

[g] We received 15 submissions to the draft Terms of Reference and 30 submissions on our Call to Submissions Paper.

[h] The Tribunal has taken all stakeholder feedback into account in making its decision in accordance with our Submissions Policy, including all confidential submissions. IPART does not publish in our reports any feedback we have received in confidential submissions.

[i] Australian Financial Review, NSW valuer general takes half of its 2.7 million valuations in-house, 3 Sept 2024

3.1.3 Individuals are worried about the potential flow on effects of greater costs

Five submissions that we received from individuals raised an issue with the potential impact of the Valuer General's proposed prices on councils. They expressed concerns about the potential flow on effects to the affordability of council rates. They suggested that this would lead to financial hardship for ratepayers and cited cost of living pressures.

3.1.4 We received other feedback around costs

- Submissions noted that the Valuer General's operating expenditure during the current determination period is below the levels approved by IPART. Submitters suggested that this cost saving has not been passed through to councils.
- There was strong support (thirteen submissions) for phasing in cost increases rather than a step increase.
- Fifteen submissions expressed concerns that the proposed cost increases were out of line with the current rate peg and that councils are unable to raise funds to cover them.
- There was concern that cost shifting from the NSW Government has impacted councils. Submissions noted this cost is not able to be included in the 2025-26 rate peg that has already been set.
- One submission proposed that IPART consider applying a similar approach to the rate peg to Valuer General prices.[6]

3.2 Submissions noted the Valuer General's proposed cost allocation is inequitable between users

- The majority of stakeholders who commented on the allocation of costs felt that costs should be allocated across all users of land valuation services (including minor users).
- Several submissions questioned the Valuer General's proposal to increase the share of costs recovered from councils. Some councils feel that costs are disproportionally allocated to councils and undercharged to Revenue NSW.
- NSW Revenue Professionals suggested that the current apportionment failed to recognise that councils are using the data less (councils receive valuations every 3 years as opposed to Revenue NSW receiving valuations annually).[7]
- Objections costs were raised as an area that has been unfairly allocated to councils. We heard in some submissions that councils should not have to pay for objections and that objectors of land valuations should be made to pay per objection.

3.3 We received varied feedback on the pricing framework

There were varied views on whether the zonal pricing structure should be retained. Two councils responded that the current zonal structure should be retained.[8] Five stakeholders questioned whether the hybrid model negated the validity of the zonal pricing model. We heard from some councils that the zonal structure should be retained but with some changes. For example, submissions asked for more detailed categorisation of councils within the pricing framework.[9] One submission proposed that zones be aligned with the contract areas.[10]

3.4 Stakeholders showed mixed support for the hybrid model

We heard mixed levels of support for the Valuer General's proposed shift to a hybrid model. Two stakeholders supported the hybrid model on the basis that the Valuer General had indicated that it would reduce costs.[11] However, respondents were concerned that the hybrid model:

- reduces justification for the 4-zone price model[12]
- would not lead to any cost savings[13]
- would reduce competitive pressure to reduce costs, resulting from the Valuer General in-housing valuations[14]
- would reduce quality controls and lead to higher objection volumes.[15]

3.5 Stakeholders gave mixed feedback around the quality of valuations

We received mixed feedback around the quality of the land valuation service provided by the Valuer General.

- Individuals shared their concerns about the quality and inconsistency of valuations and the impact of pricing on rates. Some submissions expressed dissatisfaction with the process and outcome of objections. We heard this from ratepayers across NSW, but particularly from a cluster of Albury residents.[16]
- We received some feedback that the Valuer General's service quality was positive or neutral, including a submission from LGNSW advising that there has been performance improvement over time.[17]

3.6 Stakeholders felt that councils should bear a smaller share of the cost of objections

We received 11 submissions suggesting that the cost of objections is burdensome to councils.

Some councils disagreed with having 50% of objection costs allocated to them and some argued that they should be exempt from all payment for objections. These submissions suggested that the objectors of land valuations should be made to pay per objection, or the NSW Government should bear the costs. We also heard that:

- The process of undertaking analysis of objections was suggested to be a quality assurance cost that should be borne by the NSW Government.[18]
- there should be consideration of the administrative burden that results from returned land valuation notices.[19]

3.7 We heard a series of other matters relevant to the review

We heard several other matters that are relevant to the review. Some stakeholders considered that:

- There should be an opportunity for councils to engage the services of independent valuers to provide land valuation data.[20]
- Councils should be able to choose between using Capital Improved Values (CIV) and the current land value (unimproved), should the option be feasibly viable.[21]
- IPART's review should investigate the potential impacts from any future emergency services funding reforms with the potential introduction of a new broad based property levy.[22]
- IPART should consider reducing the determination period from 6 years to 3 years. Submissions suggested that a shorter referral period would better align with council land valuation cycles and provide for a more accurate reflection of costs.[23]

4 Length of determination

Draft decision

> 1. To set prices for a 4-year period from 1 July 2025 to 30 June 2029.

The Valuer General proposed a 6-year determination period in line with the referral period. However, we found that a 4-year determination period is more appropriate due to the uncertainty regarding costs under the Valuer General's new operational model.

For this report, we have converted the Valuer General's proposal to 4-years to match the length of our draft determination.

4.1 The Valuer General has proposed a 6-year determination period

The Terms of Reference provide for a 6-year referral period. They are framed flexibly so that IPART can, if it chooses, make one or more determinations that cover, when taken together, a total period of 6 years.

The Valuer General proposed a 6-year determination based on 2 x 3-year valuation cycles. However, under the current determination one third of council valuations will be delivered each year.

IPART has identified that over the 6-year referral period, there is:

- uncertainty around external mass valuation and objection contractor costs
- significant changes resulting from the move to in-house mass valuations
- insufficient information regarding objections and minor user revenues
- a lack of proposed efficiencies, especially around objections
- uncertainty about possible regulatory changes as part of any emergency services funding reform.

4.2 Some stakeholders suggested a shorter determination period

We heard from 3 stakeholders who suggested that IPART conduct shorter interval pricing determinations. One stakeholder believed that by reducing the length of the determination period, and by IPART conducting reviews more periodically, this would lead to more accurate pricing estimations.[24] Another stakeholder suggested that IPART conduct a 3-year pricing review to better align with councils' 3-year land valuation cycles.[25]

4.3 Our draft decision is to adopt a 4-year determination period

In our 2019 determination, we supported a 6-year determination because we had confidence in the Valuer General's costs. The Tribunal's reasoning was primarily based on the understanding that mass valuation contracts were structured with a 5-year term and an optional 1-year extension. This ensured that 40% of costs were fixed over the determination period. We were subsequently advised that contracts were established with 5 + 1 + 1 terms. IPART also determined that mass valuation contracts were tendered into a competitive market and therefore were efficient.

However, as discussed in Chapter 5 of this report, the Valuer General is proposing to go to market during the next determination period so there is some uncertainty around their proposed costs.

We propose a 4-year determination, as this period would allow Value NSW to:

- embed in-house valuations
- undertake tenders for mass valuations
- develop and implement performance measures that compare efficiencies between in-house and external providers of valuation and objection services
- collect information on objections and minor users
- identify and implement productivity savings around mass valuations and objections.

A 4-year determination would also provide a level of certainty for councils for budgeting purposes.

Under the current Terms of Reference, IPART would be required to make a subsequent determination/s for the remainder of the referral period (2 years) which would involve a subsequent review.

4.3.1 We are not proposing interim period adjustments

The Terms of Reference state that IPART should

"*consider valuation service market-based factors over the determination period and identify where appropriate interim period adjustment parameters where unforeseen or unavoidable external costs may be incurred*"

IPART has not previously implemented an interim period adjustment for our determination of Valuer General prices. As part of this review, we have considered the benefits and drawbacks of passing on unexpected costs that will eventually fall on councils.

We have assessed that *unforeseen and unavoidable external costs* cannot be incorporated into the pricing determination. This is because there needs to be a detailed assessment of whether the cost is efficient and how these costs are to be allocated between users of valuations. If costs change materially during the determination period, the Valuer General can propose including these costs at the next price review.

We propose that any *unforeseen and unavoidable external costs* be assessed in a subsequent review.

4.3.2 IPART can undertake a new review within the determination period

There are areas of uncertainty or potential change that could affect the operations and financial model of the Valuer General and warrant a re-examination by IPART. IPART may choose to undertake a new review within the 4 years if there are events that impact the costs of land valuation services or the apportionment of those costs.

Potential changes may cause IPART to undertake a new determination

There are potential regulatory changes that may alter the services that the Valuer General is required to provide or that change the regulated users of the Valuer General's land valuation services. If these result in changes to the Valuer General's costs or warrant a different apportionment of those costs to users, IPART may undertake a new determination.

For example, if any potential reform of the emergency services levy were to require valuations to use capital improved value, this may change the Valuer General's costs or require revision of the apportionment of costs to users.

5 IPART's assessment of the Valuer General's operating costs

Draft decision

2. We have assessed that the Valuer General's efficient operating costs for providing valuation services over 4-years is $286.3 million.

Our draft decision for efficient operating costs for providing land valuation services is an average of $63.1 million per year. Over the 4-year determination, efficient operating costs are $286.3 million (including unregulated costs and the cost of this review). This is 15% lower than the costs forecast by the Valuer General.

We engaged The CIE as our cost consultants, to assess the Valuer General's efficient operating costs. The CIE's report can be found on our website.

A preliminary copy of the cost consultant's report was provided to the Valuer General for review.

The Valuer General was concerned that our cost consultants did not adequately address:

- concerns that the baseline for efficient costs was not appropriately established
- factors influencing corporate overheads
- mass valuation evidence
- inclusion of costs that are not within the terms of reference
- that the funding allocated to customer experience and land data is lower than the 2019 determination.

The Valuer General is transitioning to a hybrid business model to address their concerns regarding a shortage of specialised valuers seeking employment. Under this model, around half of valuations will be conducted in house by Value NSW which reduces reliance on external contractors.

IPART has considered all of the comments raised in the Valuer General's response to the preliminary draft cost report. As the independent regulator our role is to ensure that maximum prices for monopoly services are set to reflect efficient costs. Based on our analysis and advice from our cost consultant, we have proposed prices that reflect our views on the efficient costs of providing land valuation services.

There are also uncertainties with future contracting costs. Historically, rating and taxing valuations costs were determined by public tender. This was considered efficient as they were determined through a competitive tender.

However, for this assessment the proposed rating and taxing valuation costs have not been through a competitive process. This is due to over half of the rating and taxing valuations being completed in house. As the remaining external mass valuations contracts were extended until March 2026, updated market tested costs are not available. The results of market testing through only one recent tender may not be a suitable guide for the outcomes of market testing to occur in 2026.

It is our understanding that under the current Terms of Reference, IPART is authorised to make as many determinations during the six-year referral period as it sees fit. If there are material changes in costs that result from future market testing, it is open to the Valuer General to request IPART commence its next review and determination earlier than the expiry of the existing determination, although IPART is not obliged to agree to such a request. A request from the Valuer General for a fresh determination is only one of the factors that may lead IPART to issue a new determination.

To allow us to issue a fresh determination and report that respond to emerging issues, we may request that the Premier provide new Terms of Reference in future. We consider the prospect of issuing additional determinations within the referral period to be preferable to setting prices higher than necessary under this determination.

All costs referred to in this chapter are in $2024-25 unless otherwise stated.

5.1 The Valuer General proposed increased operating costs for valuation services

The Valuer General proposed operating costs of $335.2 million costs over 4 years, including unregulated costs of $33.3 million (Table 5.1)[j]. These proposed cost on a per annum basis ($83.8 million) are 30% higher than our 2019 determination ($64.4 million).[k]

Table 5.1 Valuer General's historical and proposed operating costs ($ millions, $2024-25)

Cost Category	2023-24 actual[a]	2024-25 budget	2025-26 forecast	2026-27 forecast	2027-28 forecast	2028-29 forecast	Total 2025-26 to 2028-29	% of OPEX
Labour and valuation	55.9	57	63.3	68.5	68.8	68.8	269.5	78%
Postage	0.0	1.0	1.4	1.4	1.4	1.4	5.5	2%
Graphic	0.8	0.7	0.7	0.7	0.7	0.7	2.8	1%
Other direct	3.3	4.0	4.0	4.0	4.0	4.0	16.1	5%
ICT	2.2	2.5	8.2	8.2	8.2	8.2	32.9	9%
Corporate support	1.2	1.0	5.0	5.0	4.9	4.9	19.8	6%
Total OPEX	**63.3**	**66.2**	**82.6**	**87.8**	**88.1**	**88.1**	**346.6**	**100%**

[j] The figures provided in the Valuer General's submission have an error in labour that overstates labour costs by approximately $2.8 million p.a. These figures were amended in the confidential financial model provided by the Valuer General, but not in the submission on our website.

[k] Unregulated costs were not separately identified in the 2019 determination. These include Valuer General's costs of non-monopoly services

Cost Category	2023-24 actual[a]	2024-25 budget	2025-26 forecast	2026-27 forecast	2027-28 forecast	2028-29 forecast	Total 2025-26 to 2028-29	% of OPEX
Adjusted Labour and Valuation[b]	n/a	n/a	61.2	65.4	65.7	65.7	258.1	77%
Adjusted OPEX	**63.3**	**66.2**	**80.5**	**84.7**	**85.0**	**85.1**	**335.2**	**100%**
unregulated costs	7.1	7.8	8.3	8.3	8.3	8.3	33.3	10%
Adjusted OPEX excluding unregulated cost	**56.2**	**58.4**	**72.2**	**76.3**	**76.7**	**76.7**	**301.9**	**90%**

a. Figures in the historical data in page 26 of the Valuer General's proposal are in $2018-19. This analysis converts those figures to $2024-25 for comparison.
b. The figures provided in the Valuer General's submission have an error that overstates labour costs by approximately $2.8 million per year. We have adjusted labour costs for this error.

Note: Totals may not sum due to rounding
Source: Valuer General, Pricing. Proposal, The CIE draft report, IPART analysis.

The Valuer General underspent operating costs by 4.8% in the current determination (2019-25).

5.1.1 The Valuer General forecast increases in mass valuation contract costs

In their pricing proposal the Valuer General noted changes in its operating environment which have influenced changes to its operations, cost category mix and forecast costs (Box 1):

Box 1 Changes to Value NSW's services delivery model

Changes to Value NSW's service delivery model identified in the Valuer General's proposal include:

- an aim to enhance internal capabilities and capacity, and reduce reliance on external contractors, by prioritising the development of internal resources
- significant cost increases experienced in mass valuation contract retenders undertaken during the determination period, which are anticipated to continue as part of the upcoming retender
- a strategy to reduce reliance on contracted mass valuation services and minimise expected contract price increases, with a proactive transition underway to a hybrid service delivery model for mass valuation and objections services, and
- a change in the schedule for issuing land valuations to councils, with approximately one-third of local government areas being issued each year, rather than issuing valuations to all local government areas every three years.

Source: Valuer General proposal p 8

The Valuer General proposes in its submission that the hybrid delivery model[26]:

- Reduces reliance on external contractors and improving the capacity and capability of the NSW public service.
- Mitigates overall market capture and increasing contract prices and enhance flexibility in cost management.
- Better enables service delivery, as overall market capacity constraints have caused delays for individuals interacting with Value NSW.

5.1.2 The Valuer General has brought approximately 50% of valuations and objections in-house

Historically, rating and taxing valuations and objections were completely outsourced to external providers.

In March 2023-24 mass valuations for 4 contract areas were conducted internally. From March 2025 valuations for another 4 areas will be transitioned inhouse.[27]

In their pricing proposal Value NSW indicated that it transitioned four contract areas inhouse, being Central Tablelands, North Coast NSW, Hunter Coast and Sydney Coast North. The selection of these contract areas was based on:

- The cost effectiveness for each contract area to be brought inhouse (based on an outsourced vs. inhouse feasibility analysis).
- The availability of specialist valuers seeking employment, given the land valuation services labour market is niche, technical and competitive.
- The proximity of existing Value NSW offices relative to the contract area to minimise travel costs and simplify operational logistics[28]

This has resulted in 55% of rating and taxing valuations being undertaken by internal valuers. Information from the Valuer General indicates that 11 contracts will continue to be externally contracted over the determination period.

The Valuer General has advised that there has been an increase in the volume of objections. It submits that this increase in volumes has put a strain on the capacity of contract valuers responsible for objections. Leading to extended customer response times in some cases and making it more difficult for Value NSW to procure objection valuation services in a timely and cost-effective manner. Value NSW is also adopting a hybrid approach to its objection valuations, with valuations being delivered by a mix of inhouse valuers and outsourced contracted valuers. This transition commenced in January 2025 for the 1 July 2024 valuation cycle.[29]

The Valuer General has a goal of assessing 50% of objections in house.

The decision to move to a hybrid model is forecast to increase labour costs due to a rise in the number of internal staff from 130 in the current (2019) determination period to between 285 and 291 in the next (2025) determination period. This increase includes the additional staff required for the inhouse valuation teams and supporting functions.[30] While there are reported labour shortages in the NSW valuation market, it is unclear if this shortage has been influenced by the creation of the hybrid model causing a short term increase in demand for labour.

The Valuer General's cost proposal is based on the hybrid operating model

The Valuer General's pricing proposal did not build on historical costs as it had in previous determinations. Cost categorisation between their historical and the forecast financials are different. This disconnect between the 2 methods has made it more difficult to analyse changes over time and identify and understand the differences between historical costs and proposed costs.

5.2 Stakeholders do not support the increased costs

Most submissions that we received did not see the Valuer General's proposal as representative of good value or did not support the level of price increase. In its proposal, the Valuer General said that it had implemented several improvements to enhance the quality and efficiency of its services. Some submissions pointed to the lack of any demonstrated improvements in efficiencies over the determination period. Some stakeholders also felt that the proposed price increases were unsubstantiated. These stakeholders disagreed with the cost increases proposed by the Valuer General.

5.2.1 Stakeholders felt that the proposal did not evidence efficiency improvements and cost savings

We received concerns that the Valuer General has not proposed any efficiency gains. In our stakeholder consultation we heard:

- concerns that the Valuer General has not identified where it has reduced costs or gained efficiency.[31]
- referrals to an article in the Australian Financial Review where Value NSW representatives spoke of $16 million in savings over the determination period, which are not evidenced in the proposal.[l][32]
- a suggestion that IPART's pricing should incorporate an efficiency factor.[33]
- several submissions that felt AI and innovation should result in an efficiency gain.

5.3 Our draft decision for efficient operating costs is 16% lower than the Valuer General's proposed operating costs

Our draft decision for efficient operating costs of $253.0 million is 16% (excluding unregulated costs) lower than the Valuer General's proposed costs over a 4-year determination (Table 5.2).

To determine efficient costs, we have:

- assigned costs to business units
- assessed cost drivers of individual business units.

[l] Australian Financial Review, NSW Valuer General takes half of its 2.7 million valuations in-house, 3 Sept 2024

For ease of tracking changes over time, the CIE uses the business units Rating and Taxing, Objections, Customer Experience and Land Data, Office of the CEO/ Valuer General, Val IQ and then overheads and other council related costs.

We have used the CIE's cost categories, which captured the Valuer General's proposed costs in business units (Table 5.2). We have used the first 4 years of the Valuer General's proposed costs to match the length of our draft determination.

Table 5.2 Comparison of Valuer General proposed operating costs and IPART draft decision efficient operating costs ($ millions, $2024-25)

Costs	Valuer General proposed	Tribunal draft decision	Difference (%)
Rating and Taxing	135.1	128.0	-5%
Objections	34.1	38.9	14%
Customer exp	40.6	19.6	-52%
Office of CEO/VG	18.7	9.9	-47%
Other council related	24.2	13.5	-44%
Val IQ	14.6	14.3	-2%
Overheads	34.6	28.2	-18%
Unregulated costs[a]	33.3	33.3	0%
Charge for IPART review[b]	0.0	0.6	na
Efficient costs	**335.2**	**286.3**	**-15%**
Less unregulated	33.3	33.3	0%
Total Efficient Costs less unregulated	**301.9**	**253.0**	**-16%**

a. These costs are not allocated to councils
b. The cost of IPART undertaking this review have been included

Note: Totals may not sum due to rounding
Source: The CIE draft report, IPART analysis

We have isolated unregulated costs (the Valuer General's costs of non-monopoly services) as these costs are not covered under our Terms of Reference or allocated to councils.

Our draft determination of efficient operating costs is based on our assessment of the necessary level of expenditure required by the Valuer General to efficiently provide its services. These efficient costs may differ from the actual costs incurred by the Valuer General.

5.4 We determined efficient costs based on average historical costs

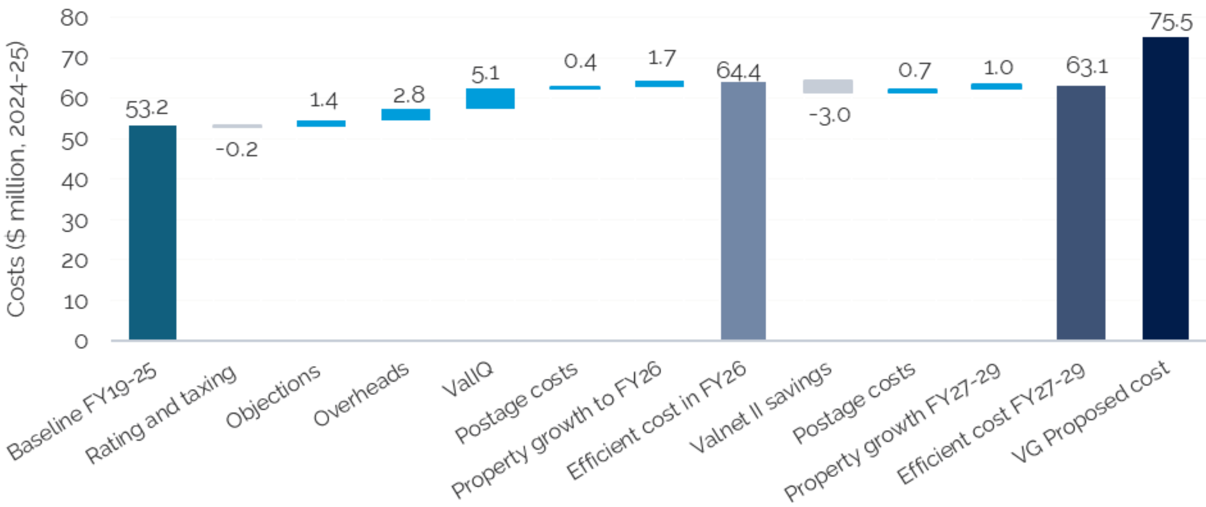
We base prices on efficient costs. The majority of operating costs relate to rating and taxing valuation, and objection costs. Previously these costs were deemed efficient as they were tendered into a competitive market. The Valuer General determines how it delivers its services and, going forward, will use a hybrid model of both in house and outsourced contracts.

The Valuer General has proposed costs based on the labour requirements identified in individual historical valuation contracts. It has not quantified any proposed savings due to economies of scale resulting from the consolidation of these services in house, except for the reduction of quality assurance staff.

Methodology of estimating efficient operating cost

The CIE, our cost consultant, estimated efficient costs using the average of historical costs for the 2019-2025 determination to establish 'Baseline FY19-25' (adjusted for inflation). Reasonable adjustments in operating costs were then added to establish 'Efficient Costs in FY26' (Figure 5.1). These are based on The CIE examination of the Valuer General's historical costs and assessment of assumptions that underpin forecast costs. We have also included adjustments within the determination period to establish 'Efficient Costs FY27-29'.

Figure 5.1 Adjustments to base historical cost to determine the efficient cost of Valuer General services over the 4-year determination period, ($ million, $2024-25)



Source: CIE Draft Report adjusted for 4-year determination period, IPART analysis.

5.4.1 IPART efficient Rating and Taxing costs are 5% lower than forecast by the Valuer General

We have deducted -$0.2 million p.a. from the Baseline FY19-25 for Rating and Taxing to reflect:

- the historical increase in mass valuation costs that resulted from the renegotiated contract in 2022
- an adjustment to remove the impact of the higher cost of moving valuations in-house in 2023-24 and 2024-25
- an increase of 5% in 2026-27 for an increase in mass valuation costs when they are retendered.

The combined impact of these decisions is that our estimated costs for the Rating and Taxing is 5% lower than proposed by the Valuer General (Table 5.3).

Table 5.3 Comparison of Valuer General proposed and Tribunal draft decision ratings costs over 4-years ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Rating and Taxing	135.1	128.0	-5%

We consider a 5% increase in the cost of mass valuation contracts efficient

Historically, rating and taxing valuation costs were determined by public tender. This was considered efficient as they were determined through a competitive tender. The rating and taxing valuation costs for our 2019 determination were based on established contract prices for the determination period.

However, for this assessment the proposed rating and taxing valuation costs have not been through a competitive process. This is due to 8 of 19 contract areas being completed inhouse. The remaining external mass valuations contracts were extended until March 2026.

Our assessment does not support the Valuer General's assumption that mass valuation contracts will increase in line with the 51.3% observed for the 2022 Sydney West retender.

Instead, for 2026-27, we have increased the Valuer General's historical mass valuation costs by 5%, or $1 million. We have based this on the frequency of contract extensions and the increasing costs associated with contract compliance.

Further information on Rating and Taxing costs can be found in Chapter 4 of the CIE's cost report.

5.4.2 IPART objection costs are higher than proposed by the Valuer General

Our assessment of efficient costs for undertaking objections is 14% higher than proposed by the Valuer General (Table 5.4). Over the determination period, compared to the Valuer General's proposal we have used:

- a lower volume of objections
- a higher per unit cost for assessing objections.

Table 5.4 Comparison of Valuer General proposed and Tribunal draft decision on objection costs over 4 years ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Objections	34.1	38.9	14%

Additionally, our allocation of costs to business areas differs from that used by the Valuer General. This has resulted in some costs that were allocated by the Valuer General to areas such as administration being included in our objections costs.

We estimate a lower volume of objections

We did not find evidence that suggested a trend of increased volume of objections over time as predicted by the Valuer General. The Valuer General averaged the number of objections over the last 8-years. However, our analysis is based on the number of objections over the last 6-years, or 2 rating valuation cycles.[m]

We have forecast annual objection volumes based on a 6-year average, to correspond with 2 historical valuation cycles, including full year objection volumes for 2023-24. Our forecast objection volumes are lower per annum than the Valuer General's forecast volumes. Objections are then increased to grow in line with property volumes over the 4 years of the determination.

Furthermore, this variation in the number of objections annually will likely decrease as in 2025 the Valuer General began issuing one-third of rating valuations each year.

We estimate a higher per unit cost for assessing objections

The Valuer General's proposal highlights the introduction of the single supplier program in 2019, aimed at improving the timeliness and consistency of objections.

The Valuer General's proposal identifies several changes designed to improve services and efficiency, such as the introduction of a new online objection process, but did not quantify cost reductions over the determination period. The Valuer General has also begun the process of assessing approximately 50% of objections in-house. It is likely that this process may result in efficiencies over time as the objections assessment processes is embedded. This is one of the reasons why our determination has been limited to 4-years.

Our analysis of objection costs shows that the per unit cost of objections has risen over the last 2 years. The CIE has determined the efficient cost of assessing an objection based on a regression analysis of objection tender costs over the last 6-years.

Further information for the proposed increase in objection costs can be found in Chapter 5 of CIE's cost report.

5.4.3 IPART efficient customer experience costs are 52% lower

The Valuer General has proposed increases in Customer Experience costs. These costs are associated with how customers access their land data and deal with the Valuer General.

We have estimated that the efficient cost of providing Customer Experience to be the average, adjusted for the increase in valuations, cost over the last 6 years. Our efficient costs are 52% below the Valuer General's proposal (Table 5.5)

Table 5.5 Comparison of Valuer General proposed and Tribunal draft decision on customer experience costs ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Customer experience	40.6	19.6	-52%

m Rating valuations are required to be issued at least once every 3 years under s 48(2)(b) of the Valuation of Land Act.

Additional discussion of Customer Experience costs can be found in Chapter 6 of CIE's cost report.

5.4.4 IPART efficient Office of the CEO/Valuer General costs are 52% lower

The Valuer General has proposed increases in the Office of the CEO/Valuer General costs.

We have estimated the Office of the CEO/Valuer General's efficient costs to be the average cost over the last 6-years. Our efficient costs are 47% below the Valuer General's proposal (Table 5.6)

Table 5.6 Comparison of Valuer General proposed and Tribunal draft decision on Office of the CEO/Valuer General costs ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Office of CEO/Valuer General	18.7	9.9	-47%

This figure has not been adjusted to reflect any expected increase over the term of the determination.

Chapter 6 of CIE's cost report discusses Office of the CEO/Valuer General costs.

5.4.5 IPART efficient overhead costs are 18% lower

Value NSW operates as a business unit of DPHI and is allocated operational costs. The Valuer General projects a 178% higher corporate overhead charge for the determination period compared to the historical period. Support costs are charged by Value NSW's overarching agency DPHI and are outside of the control of the Valuer General. The increase is likely to be reflective of:

- higher per full time equivalent (FTE) charges
- higher FTE counts to which the FTE charges apply
- higher ICT support costs.

We have assessed per FTE overhead costs charged by the DPHI to be appropriate. However, we have calculated efficient overhead costs based on the number of FTEs prior to the Valuer General's hybrid-operating model. Our efficient overhead costs are 18% lower than proposed by the Valuer General (Table 5.7).

Table 5.7 Comparison of Valuer General proposed and Tribunal draft decision corporate overheads ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Overheads	34.6	28.2	-18%

Additional discussion of overhead costs can be found in Chapter 6 of CIE's cost report.

5.4.6 IPART efficient Val IQ costs are 2% lower

Value NSW expects to roll out a new technological system from 2025-26 – Val IQ – which will support the delivery of land valuation services.[34] The system has been in development since 2022-23 and will take over the outdated Valnet II system. The annual costs of Val IQ are around 40% higher than the previous Valnet II.

The CIE adjusted the historical base by $6.1 million for the new system and to allow for the transition to the new system. Value NSW has advised that in the transition to the new technology, the two systems will run concurrently in 2025-26, and the costs for both systems will be incurred in that year. We have included the cost of both systems in 2025-26 (Table 5.8).

Table 5.8 Comparison of Valuer General proposed and Tribunal draft decision Val IQ costs ($ millions, $2024-25)

	Valuer General proposed	Tribunal draft decision	Difference (%)
Val IQ	14.6	14.3	-2%

Chapter 8 of CIE's cost report also discusses Val IQ costs.

5.4.7 Postage costs have been increased to reflect expected price rises

Costs for postage have increased over the historical period and are proposed to increase to $1.70 per stamp by July 2025[n]. We have included a one-off increase on the baseline average of postage costs to account for changes in the postage price from 2019/20 to 2025/26.

Changes to the method of delivering ratings notices, such as by email, could reduce postage costs.

5.4.8 The cost of this review has been included in efficient costs

Our draft decision includes IPART's fees for undertaking this review as these expenses were solely incurred by the Valuer General because of this review.

The costs of the review include the costs associated with IPART staff working on the review and the costs associated with our expenditure review.

5.5 Cost efficiencies over the determination period.

Some stakeholders were concerned at the lack of efficiencies in the Valuer General's proposal. Ten submissions referenced the possibility of artificial intelligence and automated valuation models (AVMs) leading to efficiency gains. Given the approach undertaken to establish efficient costs by the CIE, we do not propose a continuing efficiency factor.

[n] See https://auspost.com.au/disruptions-and-updates/pricing-updates

We have recommended that the Valuer General could achieve efficiencies over the determination period, such as increasing digital delivery of valuation notices. IPART expects that while not evident in the Valuer General's cost model, Val IQ should lead to efficiency gains and reduced costs.

5.5.1 Automated valuation models and artificial intelligence will have limited impact on the functions of the Valuer General.

We assess that artificial intelligence (AI) and automated valuation models (AVM) are unlikely to deliver substantial efficiency gains within the next 4-years. In our discussions with Australian Valuers General and valuation companies, current AVMs need further development to achieve transparency and contestability requirements. AVMs need to be trained to determine unimproved land values from land characteristics and sales data.

An analysis of the impact of AI and AVMs can be found in Chapter 8 of CIE's cost report.

6 Allocation of operating costs to councils

Draft decisions

3. To allocate 30.2% of the Valuer General's efficient operating costs to councils. This is based on allocating to councils
   a. 25% of rating and taxing valuation costs
   b. 50% of objection costs
   c. 50% of Customer experience and land data costs
   d. 99.7% of postage costs
   e. 100% of graphic costs
   f. 0% of unregulated costs
   g. 100% of IPART's charge for this review.

Efficient operating costs are allocated between the users of the Valuer General's valuation services. The Valuer General proposed councils bear 31.2% of operating costs. We have made a draft decision to allocate 30.2% of efficient operating costs to councils. We have included unregulated costs in our total costs figure to ensure that our draft decision share is comparable to the Valuer General's proposed share.

We have not allocated cost to other users of the valuation data but have deducted the revenue from these other (minor) users from efficient costs before proposing prices, as we have done in previous determinations. We seek stakeholder feedback on the future treatment of 'minor' or other users.

6.1 The Valuer General proposed 31.2% of costs be allocated to councils[o]

The Valuer General has proposed an allocation of 31.2%[p] of costs to councils, which is 0.8% higher than the 2019 determination (Table 6.1).

Table 6.1 Previous determination and the Valuer General 2025 proposed and draft decision allocation of costs

Allocation of NRR	2014 Determination	2019 Determination	2025 Valuer General proposed	2025 Draft decision
Councils	34%	30.5%	31.2%	30.2%
Revenue NSW	66%	69.5%	68.8%	69.8%

o Refer to section 7.3 for an explanation of the difference between the allocation here and in the Valuer General's proposal.

p The Valuer General's published proposal allocated 31.3% of costs to councils. However, as discussed in Chapter 5, we discovered an error in their cost model which overstated their labour costs by around $2.8 million pa. Correcting the error reduced the allocation of costs to councils to 31.2% (0.1% less).

6.2 Some stakeholders disagree with the Valuer General's proposed cost allocation

A number of submissions questioned the Valuer General's proposal to increase the share of costs recovered from councils. Some councils consider that costs are disproportionally allocated to councils and undercharged to Revenue NSW. For example, we heard that the current apportionment does not appropriately recognise that councils receive valuations every 3 years as opposed to Revenue NSW receiving valuations annually. [35]

The majority of stakeholders who commented on the allocation of costs also felt that costs should be allocated across all users of land valuation services (including unregulated or minor users).[36]

Objections costs were also raised as an area that has been unfairly allocated to councils. We heard in submissions that councils should not have to pay for objections and that objectors of land valuations should be made to pay for objections.[37]

6.3 Our draft decision is to allocate 30.2% of costs to councils

Our draft decision is to allocate 30.2% of the Valuer General's efficient cost of providing rating and taxing valuation services to councils. In making our decision, we have applied our funding hierarchy (see Box 6.1).

Box 6.1 IPART's funding hierarchy to allocate costs

Across a range of industries, IPART has applied the following funding hierarchy when allocating costs between different entities:

- Preferably, the impactor or risk creator should pay – i.e., those ultimately creating the costs, or the need to incur the costs, should pay the costs.
- If that is not possible, the beneficiary should pay (direct beneficiaries before indirect beneficiaries) – where users pay charges on the basis of benefitting from the service.
- As a last resort, taxpayers pay - taxpayers may be considered as a funder of last resort where risk creators or beneficiaries have not been clearly identified; or where it is not administratively efficient or practical to charge impactors or beneficiaries.

We have applied this framework to our analysis of the apportionment of costs between Revenue NSW and councils.

For the Valuer General's rating and taxing valuations, there are two clear impactors: Revenue NSW and councils. In this case, both are impactors and beneficiaries.

Source: IPART

To ensure an efficient allocation, we:

- identified the users of the rating and taxing valuations
- established the purpose for which the valuations are used
- attributed costs on the basis of usage.

Our draft decision for the percentage allocated for each business unit is generally in line with the Valuer General's proposal, except for objections costs which we have apportioned at 50% instead of 50.2% proposed by the Valuer General (see Table 6.3).

Our allocation of costs across business units (refer section 5.3) results in a smaller share of total costs allocated to councils (30.2%) than the Valuer General's proposed share (31.2%). This is because a larger share of the efficient costs is apportioned at a lower rate to councils. For example:

- Rating and Taxing, which is proposed to be apportioned at 25%, forms a larger portion of total costs under our draft decisions for costs (58.7%) when compared to the Valuer General's proposed costs (56.6%).
- Objections and Customer experience and land data which are proposed to be apportioned at 50% is a smaller portion under our draft decision costs (8.0%) when compared to the Valuer General's proposed costs (14.4%).

Our proposed allocation includes the $620,000 cost of the IPART review allocated to councils.

Table 6.2 Draft decision allocation of costs to councils over the determination period

Business Unit	Efficient Costs $ millions	Share of total costs %	Councils' share %	Cost Allocation $ millions
Rating and taxing (including indirect costs)	168.0	58.7%	25.0%	42.0
Objections (including indirect costs)	49.6	17.5%	50.0%	24.8
Customer experience and land data (including indirect costs, excluding postage and graphics)	22.6	8.0%	50.0%	11.3
Postage	5.6	2.0%	99.7%	5.6
Graphics	2.1	0.7%	100.0%	2.1
Unregulated	37.8	13.2%	0.0%	0.0
Cost of IPART review	0.6	0.2%	100.0%	0.6
Draft decision costs	**286.3**	100.0%		**86.4**
Total Allocation				**30.2%**

Note: Totals may not sum due to rounding
Source: IPART analysis

The apportioned business unit costs include both direct and indirect costs (e.g. Val IQ and corporate costs). The Valuer General and IPART used a similar methodology to allocate indirect costs to the business units (i.e. Taxing and Rating, Objections and Customer experience and land data and unregulated costs).[q] The combined costs are then apportioned between councils and Revenue NSW.

Table 6.3 Valuer General proposed allocation of costs to councils over the determination period

Business Unit	Valuer General proposed costs	Share of total costs	Councils' share	Cost Allocation
Rating and taxing (including indirect costs)	189.7	56.6%	25.0%	47.4
Objections (including indirect costs)	47.9	14.3%	50.2%	24.0
Customer experience and land data (including indirect costs, excluding postage and graphics)	48.1	14.4%	50.0%	24.1
Postage	5.9	1.8%	99.7%	5.9
Graphics	3.0	0.9%	100.0%	3.0
Unregulated	40.5	12.1%	0.0%	0.0
Proposed Cost Total	**335.2**	100.0%		**104.5**
Total Allocation				**31.2%**

Note: Totals may not sum due to rounding
Source: Value NSW cost model, IPART analysis

6.3.1 Our draft decision is to allocate 25% of the cost of rating and taxing to councils

Our draft decision is to allocate 25% of the cost of rating and taxing to councils, The Valuer General produces 4 valuation lists, or 'products', every 3 years. Councils receive one of these lists and Revenue NSW receives 3. Applying the beneficiary pays principle (Box 6.1), councils receive 1 in 4 of the Valuer General's 'products' and should therefore pay 25% of the costs.

While there are a number of ways the costs could be apportioned between councils and Revenue NSW, IPART has historically allocated 25% of costs to councils for rating and taxing valuation services. There have not been significant changes in the rating and taxing services delivered to councils and Revenue NSW since the last determination and we consider a 25% share, based on the proportional use of the service, remains reasonable.

In its submission to this review, NSW Revenue Professionals suggested that taxing and rating costs should be apportioned 16.7% to councils and 83.3% to Revenue NSW. The submission argues that the costs for one of 3 years should be split 50:50 between the 2 parties, and the costs for 2 years of the 3-year cycle should be borne by the NSW government (Revenue NSW) (Table 6.4).

q The Valuer General's methodology allocates indirect costs to the service areas based on the number of staff (FTE) in each service area. Our methodology allocates costs based on the proportion of direct costs used in each area.

Table 6.4 Alternative proposed valuation split

	Year 1	Year 2	Year 3	Total over 3 years
Council	50%	0%	0%	16.7%
Revenue NSW	50%	100%	100%	83.3%
Total	**100%**	**100%**	**100%**	**100%**

We assessed NSW Revenue Professionals' proposal in our 2019 review, and decided not to adopt it on the grounds that:

- Councils receive some benefit from having updated lists available to them each year. For example, the Valuer General can issue a new general valuation list to any council on request and there is no additional charge levied to the council.
- The stand-alone cost (i.e. the cost if councils were the Valuer General's only customer) would be higher than 16.7%.[r]

We consider these reasons still hold. The Valuer General has confirmed that councils can, and from time to time do, request an updated list at no cost. The Valuer General also issues supplementary valuations throughout the 3-year cycle and some of the associated costs are captured in taxing and rating. Further, if councils were the only customer, (stand-alone) costs would likely be more than 33% of current costs (and close to 100% under current legislative requirements).

6.3.2 Our draft decision is to allocate 50% of objection costs to councils

The Valuer General proposed 50.2% of objection costs be allocated to councils. This is based on a 3-year historical average of general objections (council rates) compared to land tax objections (Revenue NSW).

Our draft decision is to allocate 50% of objection costs to councils. This is slightly lower than the 50.2% proposed by Value NSW, but higher than our 2019 determination of 38%. Our decision is based on our analysis of the proportion of objections categorised as relating to councils or Revenue NSW considering:

- the volume of objections over time
- number of objections for each category over time
- the relative costs of each objection.

We propose to allocate objection costs based on historical volumes

Like the Valuer General, IPART proposes to use the average volume of objections over time as a method of allocating costs to councils. The Valuer General used a 3-year average while we have extended our analysis to consider both long and short term trends.

[r] *IPART, Review of prices for land valuation services provided by the Valuer General to councils from 1 July 2019 to June 2025,* pp 43-44

We have reviewed council related objection volumes over time to estimate future levels of objections. The former practice of council valuations being issued once every 3 years (a general valuation year), created cyclical levels of objections. High proportions of general objections in the recent past have corresponded with a general valuation year. The Valuer General has stated that this coincided with a weakening in the property market between the valuation date and issuing valuations notices.[s]

Because of this variability in objection volumes, the choice of timeframe used to review objections greatly influences the proportion of objections allocated to councils.

We considered allocation based on the proportion of historical costs over time, but there are many aspects of objections that impact the variability of objection costs over time. In the new hybrid model the cost of objections will also be influenced by which objections are completed in-house and which are contracted out.

General objections appear to make up a larger share of total objections

The proportion of general objections, for rating purposes, to total objections, varies significantly year to year. For example, they varied from 4% in 2018-19[38] to 58% in 2020-21[39]. General objections make up a larger share of total objections in valuation years.

Our assessment of objections over different timeframes is that, on balance, 50% is an equitable apportionment to councils.

6.3.3 Our draft decision is to allocate 50% of customer experience and land data costs to councils

The Valuer General advise that the Customer Experience and Land Data team undertakes supplementary valuations and work on objections. Both councils and Revenue NSW receive supplementary valuation lists each year. We agree with this 50% split to councils. This split is consistent with both impactor and beneficiary pays principles.

6.3.4 Postage and Graphic costs are predominantly allocated to councils

Graphic and postage costs are incurred by Value NSW to distribute land valuation for rating purposes only. Revenue NSW undertakes its own notification process. Therefore 99.7% of postage (there are some minor non-council postal costs) and 100% of graphic costs are attributed by Value NSW to councils as they are the impactor.

Our draft decision is to allocate 100% of graphic services costs and 99.7% of postage costs to councils for this draft determination.

[s] NSW Valuer General, Yearly Insights 2023-24, November 2024, p 23

6.3.5 Our draft decision is to allocate 100% of the cost of IPART's review to councils

We propose to include the cost of IPART's review into the Valuer General's efficient costs[t]. We consider including the fee is reasonable, because it is an unavoidable cost of providing valuation services to councils due to the legal requirement for IPART to conduct this review.

Our draft decision is that the full cost of the review be apportioned to councils. While the Valuer General provides land valuations for rating and taxing to councils and to Revenue NSW, IPART's Terms of Reference (Appendix A) require us to review the monopoly services of the Valuer General to councils. We do not have power under the IPART Act or the Terms of Reference to set prices for other users of the Valuer General's services.

As such, councils are both the impactor and the beneficiaries of IPART's services. Inclusion of the costs of this review increase the price to councils by 6 cents per valuation (less than 1% of the total price).

6.4 Minor (or other) users of mass valuations

We propose to deduct the revenue received from other users (identified as minor users in the Valuer General's proposal) of mass valuation data from the Valuer General's revenue requirement (Chapter 7). This is consistent with our previous reviews and the Valuer General's proposal. This is so that councils are not paying the marginal costs of services provided to other (minor) users.

The Valuer General has advised that the revenue received from these other users of land valuation data changes from year to year: average income over the last 5 years has been $60,000 p.a. and peaking at $78,000 in 2020-21 (approximately 0.1% of costs). Revenue for these services is set by the Valuer General on a fee for service basis and generally covers the cost of providing existing data. In the past it has been argued that the data is used because it exists, and that other users are not impactors in the creation of costs.[u]

6.4.1 Accounting for other users of land valuation services

In our 2014 determination, the following methodology was identified to determine if other users should be allocated a portion of total valuation costs.

- **Similar use** - the users should use the valuation services in a similar way to councils and Revenue NSW – i.e., for a revenue or commercial related purpose.
- **Materiality** – the quantity of valuations used by these users as a percentage of total yearly valuations should be significant in order for them to contribute towards the Valuer General's fixed costs and be charged on an average cost rather than marginal (i.e incremental) cost basis.

[t] The Valuer General did not include the fee in its proposal
[u] IPART Public Hearing on the Review of Prices for Land Valuation Services Provided by the Valuer-General to Councils, 25 February 2014, p 44

As part of this Draft Report, we are consulting on whether this approach for assessing other users of the rating and taxing data continues to be appropriate, or whether IPART should consider assessing other users against different criteria.

It may be appropriate that the criteria used to determine if costs should be apportioned to users is changed or expanded, for instance:

- A definition of 'materiality' that incorporates consideration of the income derived by the users of the rating and taxing valuations, rather than solely assessed on the volume of valuations used?
- Consideration of whether 'similar use' remains a necessary criterion?

Seek Comment

1. Should IPART change the way it allocates costs to other users of land valuation data?

Who are the other users

Other users of mass valuation data have included:[40]

- private brokers and the general public
- Other government agencies such as NSW Fire and Rescue, Transport for NSW, NSW Crime Commission, NSW Police Force, NSW Crown Lands and Local Government Grants Commission.

From October 2024, the ability for the general public and private brokers to download mass valuation data has been removed from the Valuer General's website.

We have assessed the users identified as minor users by the Valuer General and determined that their use cases do not meet the current similar use and materiality thresholds.

Box 6.2 Fire and Rescue case study

NSW Fire and Rescue is required to use aggregated valuation data to set levies for metropolitan councils. It is one of the largest and regular other users of mass valuation data.

Under the *Fire and Rescue NSW Act 1989* (s.51(3) and (6)), councils for each fire district must contribute 11.7% of the fire brigade's funding target. For the Sydney Metro area, the contribution is based on the average of the previous 5 years aggregated rateable land values. For the country districts contributions are calculated differently and do not use mass valuation data.

Box 6.2 Fire and Rescue case study

The contributions made by councils in NSW for 2022-23 were $99.4 million.[v]

We assessed that Fire and Rescue did not use the valuations in:

- **Similar** way as the revenue is raised from councils which is ultimately passed on to landowners who are the beneficiaries of Fire and Rescue's services. Whereas councils and Revenue NSW receive income directly from landowners.
- **Materially** the same way as the data is an aggregated total rather than individual land valuations.

Process improvements to increase transparency around other users of rating and taxing valuation data

Historically, the Valuer General did not track the total costs that it incurs for providing valuation services to other users. Revenue from these users appears to be charged and recorded in different ways over time. We are aware that the Valuer General is currently updating these processes.

With the removal of the previously publicly available mass valuation data, it is possible that there may be an increase in the number of users who will be charged for accessing the data. We want assurance that for future reviews we will be able to identify any additional charges levied on councils for data that is currently available under the existing mass valuation contracts.

To effectively review efficient costs and apportion them to the users of the rating and valuation information IPART needs transparent and complete data. We expect that information on the use of this data will be made available by the Valuer General at the next review including: the users, the contact details, the purpose of the data, the revenue derived, and the costs incurred in providing the information.

Draft Recommendation

1. The Valuer General enhances transparency by gathering information on the specific purposes for which land valuation data is used, alongside any associated revenue generated and costs incurred.

[v] Fire and Rescue NSW, Annual Report 2022-23, p 139

7 Revenue requirement

Draft decisions

Our draft decisions on the total revenue requirement are:

4. To set a total revenue requirement for valuation services provided to all users of $286.6 million which is shown in Table 7.1 and comprises:
   a. an efficient operating expenditure allowance of $286.3 million
   b. a depreciation allowance of -$6.6 million
   c. a return on the Regulatory Asset Base of -$2.6 million
   d. a working capital allowance of $9.6 million

5. To set a revenue requirement to be recovered from councils of $86.4 million, which is shown in Table 7.2 and comprises
   a. an efficient operating expenditure allowance of $86.4 million
   b. a depreciation allowance of -$2.0 million
   c. a return on the Regulatory Asset Base of -$0.8 million
   d. a working capital allowance of $2.9 million

Our draft decision on revenue from minor users is:

6. To subtract $0.08 million for income from minor users from councils' share of the revenue requirement before we set prices, which is shown in Table 7.3.

Our draft decisions to arrive at the total revenue requirement are:

7. To calculate the total revenue requirement by:
   a. adopting a building block method with a Regulatory Asset Base, simplified by incorporating the tax allowance into the return on assets component of the revenue requirement.
   b. compensating councils for previously overpaid depreciation in prices, with one third repaid over the 4-year determination period.
   c. setting the opening Regulatory Asset Base to be -$20.1 million and the closing Regulatory Asset Base to be -$13.4 million, which is shown in Table 7.5.
   d. using a weighted average cost of capital (WACC) of 3.8% (pre-tax real) to calculate the return on the Regulatory Asset Base and 6.7% (pre-tax nominal) to calculate the working capital allowance.

Our draft decision total revenue requirement of $286.6 million is 22% lower than that proposed by the Valuer General, and the amount of $86.4 million allocated to councils is 25% lower than proposed.

In making our draft decision, we:

- used a building block method with a regulatory asset base (RAB)
- adjusted for depreciation in prices, so that councils are not overcharged for depreciation.

Under our draft decision, we subtract $0.08 million for revenues from minor users from councils' share of the revenue requirement before we set proposed prices.

7.1 We determined a draft revenue requirement that is 22% lower than the Valuer General's proposal

The revenue requirement is the efficient total costs of the Valuer General providing valuation services over the determination. In general, we set prices to recover councils' share of the total revenue requirement, minus councils' share of the revenue the Valuer General receives from minor users of mass valuation data. We deduct the revenue from minor users before we set prices because we have not allocated costs to the minor users.

IPART determined the draft total revenue requirement to be $286.6 million over 4 years and councils' share to be $86.4 million (30.2%). This amount is 22% lower than the $367.2 million proposed by the Valuer General over 4 years, and 25% lower than the $115.1 million allocated to councils.

Table 7.1 shows the Valuer General's proposed and our draft decision total revenue requirement and Table 7.2 shows Councils' share of the revenue requirement.

Table 7.1 Draft revenue requirement per annum ($ millions, $2024-25)

	Average over 2019 determination period	2025-26	2026-27	2027-28	2028-29	Total
Total revenue requirement proposed by Valuer General	**69.4**	**86.5**	**93.3**	**93.7**	**93.7**	**367.2**
IPART decision (cost build-up components)						
Operating expenditure	64.4	73.3	70.5	71.0	71.5	286.3
Depreciation [a]	2.3	-1.6	-1.6	-1.6	-1.6	-6.6
Return on RAB [b]	0.7	-0.8	-0.7	-0.6	-0.6	-2.6
Return on working capital	1.9	2.4	2.4	2.4	2.4	9.6
Total revenue requirement (IPART decision)	**69.4**	**73.3**	**70.6**	**71.1**	**71.7**	**286.6**
Difference between the proposed and IPART decision total revenue requirement	na	-13.2	-22.7	-22.6	-22.0	-80.5
Difference between the proposed and IPART decision total revenue requirement (%)	na	-15%	-24%	-24%	-24%	-22%

a. In this table, the regulatory depreciation is a mid-year value (i.e. the RAB roll-forward depreciation amount is discounted by half a year of WACC).

b. The return on assets includes an allowance for tax.

Note: Valuer General's proposal over a 4-year determination period. Totals may not sum due to rounding.
Source: Valuer General proposal, IPART analysis.

Table 7.2 Draft revenue requirement to be recovered from councils before subtracting revenue from minor users per annum ($ millions, $2024-25)

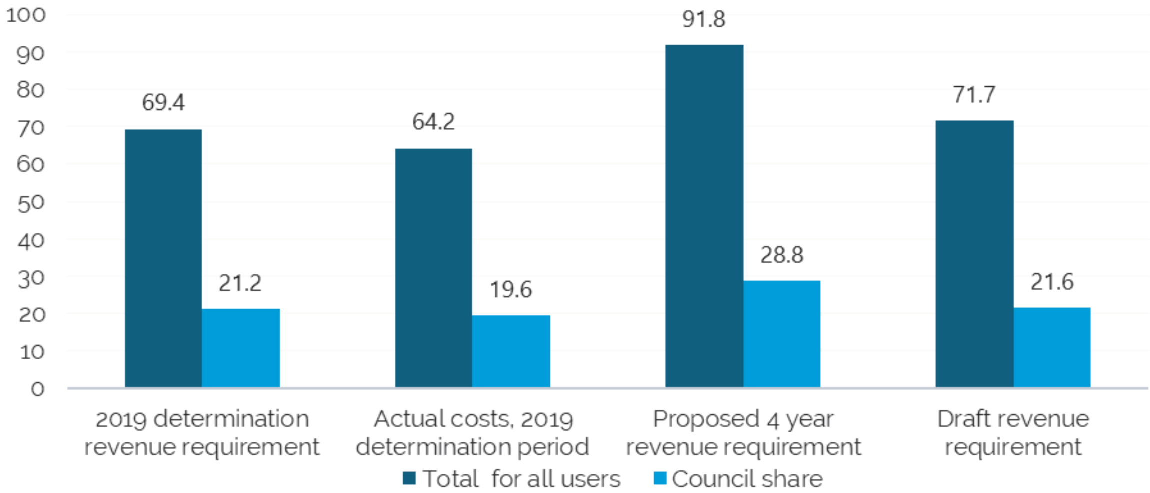
	Average over 2019 determination period	2025-26	2026-27	2027-28	2028-29	Total 2025-29	Councils' share (%)
Total revenue requirement proposed by Valuer General	**21.2**	**27.3**	**29.2**	**29.3**	**29.3**	**115.1**	**31.4%**
Draft decision (cost build-up components)							
Operating expenditure	19.6	22.5	21.1	21.3	21.4	86.4	30.2%
Depreciation [a]	0.7	-0.5	-0.5	-0.5	-0.5	-2.0	30.5%
Return on RAB [b]	0.2	-0.2	-0.2	-0.2	-0.2	-0.8	30.5%
Return on working capital	0.6	0.8	0.7	0.7	0.7	2.9	30.2%
Total revenue requirement (IPART decision)	**21.2**	**22.6**	**21.1**	**21.3**	**21.5**	**86.4**	**30.2%**
Difference between the proposed and draft decision revenue requirement	na	-4.8	-8.1	-8.0	-7.8	-28.7	na
Difference between the proposed and draft decision revenue requirement (%)	na	-17%	-28%	-27%	-27%	-25%	-1.2%

a. In this table, the regulatory depreciation is a mid-year value (i.e. the RAB roll-forward depreciation amount is discounted by half a year of WACC).
b. The return on assets includes an allowance for tax
Note: Valuer General's proposal over a 4-year determination period. Totals may not sum due to rounding.
Source: Valuer General proposal, IPART analysis.

Operating expenditure accounts for more than 99% of our draft revenue requirement. The Valuer General also incurs capital expenditure and requires working capital. Operating expenditure is discussed in Chapter 5 and councils' share in Chapter 6. This chapter explains the other components of the revenue requirement.

The Valuer General underspent the required revenue allowance over the 2019 determination period. In the 2019 determination approximately $21.2 million per year was allocated to councils. Our draft decision for this determination is for a total revenue requirement of $21.6 million per year to be allocated to councils. Our draft decision results in councils paying a similar amount to our 2019 determination amount (Figure 7.1).

Figure 7.1 Current determination period, proposed and draft decision revenue requirement per year, ($ million, $2024-25)



Note: The actual costs are estimated, based on the Valuer General's reported actual operating expenditure and depreciation costs.
Source: IPART analysis.

7.2 Our draft decision is to subtract forecast revenue from minor users from efficient costs

Once we have calculated the revenue requirement and allocated a share to councils, our draft decision is to deduct councils' share of revenue from minor users then set prices to recover the remaining amount.

The Valuer General expects to collect around $66,750 from minor users each year over the 2025 determination period. We propose to allocate 30.2% of this amount to councils (around $20,130 per year), in line with their share of the revenue requirement. This reduces the revenue required from prices by around $80,520 (0.1%) over the determination period (Table 7.3).

Table 7.3 Forecast revenue from minor users and revenue to be recovered from prices per annum ($ millions, $2024-25)

	2025-26	2026-27	2027-28	2028-29	Total 2025-29
Councils' share of revenue requirement	22.6	21.1	21.3	21.5	86.4
Councils' share of revenue from minor users	0.02	0.02	0.02	0.02	0.08
Revenue to be recovered from prices	22.5	21.1	21.3	21.5	86.4
Reduction in revenue requirement (%)	-0.1%	-0.1%	-0.1%	-0.1%	-0.1%

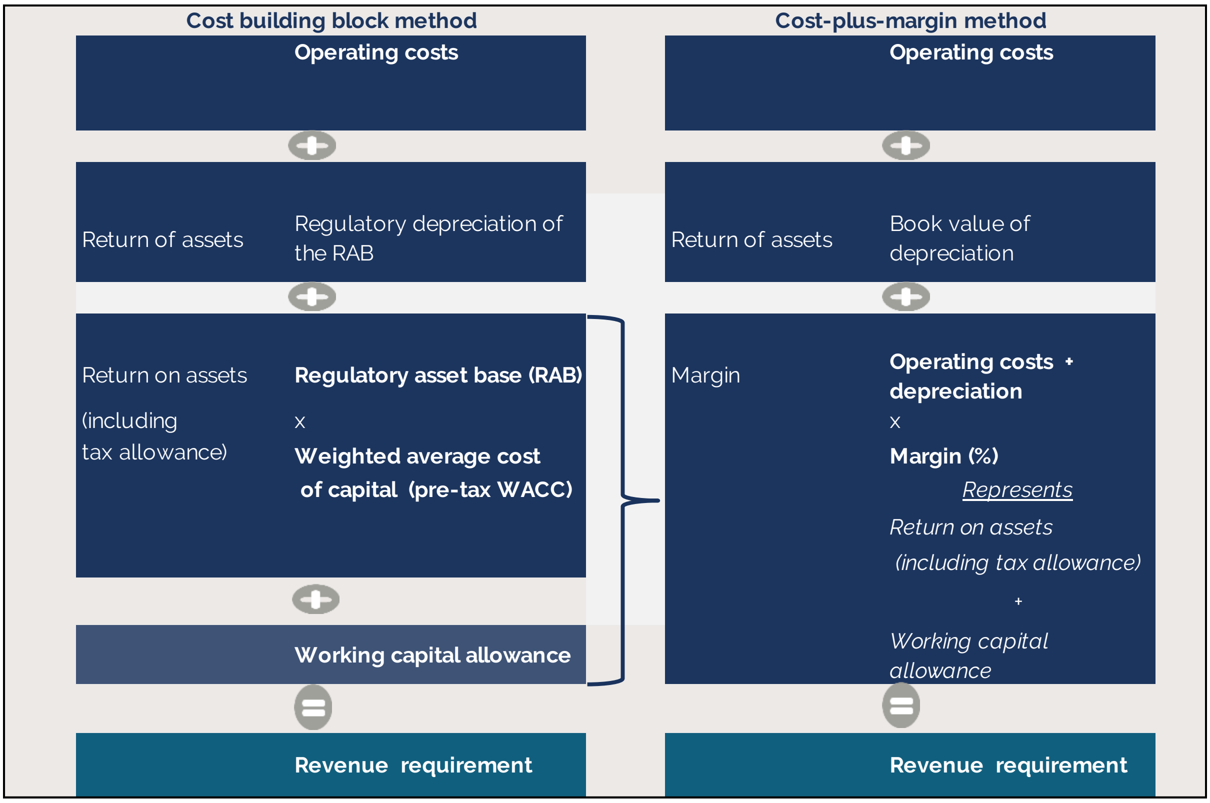
Note: Totals may not sum due to rounding.
Source: IPART analysis

7.3 Our draft decision is to adopt a building block method

Previous determinations used a building block method with a RAB to calculate the revenue requirement. However, the Valuer General's sole remaining asset is software, and its costs are mainly operating costs. After preliminary discussions with the IPART Secretariat, the Valuer General's proposal used a cost-plus-margin method with a 3.8% margin applied to its proposed operating costs plus expected depreciation.

For reasons explained in section 7.6 below, we consider a cost-plus-margin method would be less accurate than a building block method. Our draft decision is to continue to use a building block method with a RAB, simplified by incorporating the tax allowance into the return on assets component of the revenue requirement. Figure 7.2 shows the relationship between our draft decision cost building block method and a cost-plus-margin method.

Figure 7.2 Comparison of building block and cost-plus-margin methods



Source: IPART

7.4 Our draft decision is to not overcharge councils for depreciation

Our standard RAB method automatically ensures that customers are not overcharged for depreciation.

When we roll forward a RAB to the start of a new determination period, we begin with the opening RAB in the year before the start of the current determination period.[w] Then we:

- add the capital expenditure the business actually incurred each year
- subtract any capital grants the business received each year
- subtract the depreciation that we expected they would incur each year (adjusted for inflation), based on the forecast of capital expenditure at the time we set the prices, i.e. 'allowed' depreciation
- subtract actual disposals (if any)
- add RAB indexation to maintain the real value of the RAB.

Subtracting 'allowed' depreciation (instead of actual depreciation) means the RAB will be reduced by the amount of depreciation that customers have already paid in prices. This mechanism ensures that customers are not overcharged for depreciation when the business spends less than the forecast amount of capital expenditure.[x]

When the depreciation allowance exceeds actual capital expenditure, the RAB can turn negative.

7.4.1 Councils will not contribute to the capital costs of Val IQ

The Valuer General underspent its capital expenditure allowance over the 2014 and 2019 determination periods. The only capital expenditure it has undertaken since 2022-23, and plans to undertake over the 2025 determination period, is on Val IQ. It expects to spend a total amount of $19.8 million (nominal) on this project, and this amount will be fully funded by means of a capital grant from the Digital Restart Fund.

Under our building block method, we exclude from the RAB any capital expenditure that is funded by means of capital grants. The reason for doing so is that customers should not be required to pay the business for assets that have been externally funded (since the business has not spent its own money). This means that councils will not be required to contribute to the capital cost of Val IQ.

7.4.2 Our draft decision is to depreciate the negative RAB over 12 years

The Valuer General's capital underspend over two consecutive determination periods, combined with grant funding for Val IQ, means it will have an expected closing RAB value of -$20,1 million on 30 June 2025 (Table 7.4).

[w] We start from the last year of the previous determination period because, when we set the prices for the current determination period, we used forecasts of capital expenditure and inflation. Our method ensures that we aways replace forecast with actual values.

[x] Similarly, the RAB method allows us to recover underpaid depreciation from customers if actual prudent and efficient capital expenditure exceeds allowed expenditure. In other words, it ensures that customers pay for the depreciation of assets, but only once.

Table 7.4 Regulatory Asset Base to 30 June 2025 per annum ($ millions, nominal)

	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Opening RAB	-3.8	-5.4	-5.7	-7.1	-9.3	-12.7	-16.4
plus capital expenditure	0.0	0.6	0.0	0.0	3.6	5.9	7.5
minus capital grants	0.0	0.0	0.0	0.0	3.6	5.9	7.5
minus allowed depreciation	1.6	0.9	1.1	1.8	2.8	3.2	3.4
plus indexation	-0.1	0.0	-0.2	-0.4	-0.6	-0.5	-0.4
Closing RAB	**-5.4**	**-5.7**	**-7.1**	**-9.3**	**-12.7**	**-16.4**	**-20.1**

Note: Totals may not sum due to rounding.
Source: IPART analysis

Our draft decision is that we will depreciate the (negative) closing RAB over 12 years and recover the (negative) depreciation and return on the RAB amounts in the revenue requirement. We decided to depreciate the RAB over 12 years because that is the time it took for the Valuer General to build up a negative RAB. We also made our draft decision in the interests of price stability between determination periods. For example, recovering the full amount over 4 years would mean the average price would fall by 5.2%.

Table 7.5 shows the expected value of the RAB over the 2025 determination period.

Table 7.5 Regulatory Asset Base from 1 July 2025 per annum ($ millions, $2024-25)

	2025-26	2026-27	2027-28	2028-29
Opening RAB	-20.1	-18.5	-16.8	-15.1
plus capital expenditure	2.8	0.0	0.0	0.0
minus capital grants	2.8	0.0	0.0	0.0
minus allowed depreciation	-1.7	-1.7	-1.7	-1.7
plus indexation	0.0	0.0	0.0	0.0
Closing RAB	**-18.5**	**-16.8**	**-15.1**	**-13.4**

Note: Totals may not sum due to rounding.
Source: IPART analysis.

7.5 The revenue requirement includes capital allowances

Under our building block approach, in addition to operating costs the revenue requirement includes allowances for:

- depreciation
- return on RAB
- working capital (i.e. a return on working capital).

7.5.1 Depreciation and return on RAB

The depreciation and return on RAB amounts in the revenue requirement are negative numbers, which show how much the Valuer General would be required to return to all its customers over the next 4 years ($9.2 million, shown in Table 7.6).

Table 7.6 Draft decision on total depreciation and return on RAB per annum ($ millions, $2024-25)

	2025-26	2026-27	2027-28	2028-29	Total
Depreciation [a]	-1.6	-1.6	-1.6	-1.6	-6.6
Return on RAB [b]	-0.8	-0.7	-0.6	-0.6	-2.6
Total	**-2.4**	**-2.3**	**-2.3**	**-2.2**	**-9.2**

a. The return on assets includes an allowance for tax.
b. In this table, the regulatory depreciation is a mid-year value (i.e. the RAB roll-forward depreciation amount is discounted by half a year of WACC)

Note: Totals may not sum due to rounding.
Source: IPART analysis.

Councils will receive only a proportion of this amount in prices. Our draft decision is to allocate 30.5% of the amount to councils ($2.8 million), consistent with their share of allowed depreciation over the 2019 determination period (Table 7.7). This results in a $0.25 per valuation reduction in the proposed price paid by councils.

Table 7.7 Draft decision on councils' share of depreciation and return on RAB per annum ($ millions, $2024-25)

	2025-26	2026-27	2027-28	2028-29	Total over 2025 DP	Council share
Depreciation [a]	-0.5	-0.5	-0.5	-0.5	-2.0	30.5%
Return on RAB [b]	-0.2	-0.2	-0.2	-0.2	-0.8	30.5%
Total	-0.7	-0.7	-0.7	-0.7	-2.8	30.5%

a. The return on assets includes an allowance for tax.
b. In this table, the regulatory depreciation is a mid-year value.

Note: Totals may not sum due to rounding.
Source: IPART analysis.

7.5.2 Working capital allowance

The working capital allowance (i.e. the return on working capital) represents the return the business could earn on the net amount of working capital it requires each year to meet its service obligations. It ensures the business recovers the cost it incurs due to the time delay between providing a service and receiving the money for it (i.e. when the bills are paid). The Valuer General invoices its customers once a year, which results in a working capital allowance of $9.6 million over 4 years. Councils will be allocated 30.2% of this amount ($2.9 million over 4 years), consistent with their share of the total revenue requirement. Table 7.8 shows the working capital allowance.

Table 7.8 Draft decision on the working capital allowance per annum ($ millions, $2024-25)

	2025-26	2026-27	2027-28	2028-29	Total over 2025 DP	Council share
Total allowance	2.4	2.4	2.4	2.4	9.6	na
Councils' share	0.8	0.7	0.7	0.7	2.9	30.2%

Note: Totals may not sum due to rounding.
Source: IPART analysis

7.5.3 The rate of return used to calculate the return on RAB and working capital

We use a weighted average cost of capital (WACC) to calculate the return on RAB and the working capital allowance.

We applied our standard 2018 WACC methodology to calculate the WACC, using Valuer General-specific risk-related parameters.[y] Our draft decision is to use a rate of return before inflation (real pre-tax WACC) of 3.8% to calculate the return on RAB and a nominal rate of return of 6.7% (nominal pre-tax WACC) to calculate the return on working capital.

In setting the WACC, we consider that the Valuer General's cash flows are known with a fair degree of certainty because they are driven by statutory requirements for its main customers (Revenue NSW and councils). A fair degree of certainty leads to a lower WACC than for businesses whose cash flows are more uncertain, such as water and electricity businesses. Our decision is consistent with our 2019 review of prices.[41]

As previously indicated, the only departure from our previous method is to include an allowance for tax in the return on assets component of the revenue requirement. We do so by using a rate of return that includes provision for tax (i.e. a pre-tax WACC) to calculate the return on assets and working capital. The impact on prices of the change in our approach is immaterial.

7.6 We propose to use a building block model with a pre-tax WACC rather than a cost-plus-margin approach

The Valuer General's proposal used a cost-plus-margin method, with a 3.8% margin based on the allowances for the 2019 determination period. It applied this margin to its proposed operating costs plus depreciation of Val IQ software.

The main difference between the cost building block and a cost-plus approach is the method used to calculate a return on fixed assets and working capital. Under the building block approach the value of the return is determined by the rate of return (WACC) and the value of the assets (RAB and working capital, respectively). Specifically:

- return on RAB = RAB x real WACC

[y] The Valuer General-specific risk-related parameters are the equity beta, which measures volatility (0.45) and the gearing ratio (45%) which is the assumed share of capital that is debt-funded. Our draft report WACC can be reproduced using our online model, with the appropriate selections. To make the selections, on the 'WACC Calculator' worksheet select the Valuer General 'Industry' (row 14) for a 4-year determination period (row 36) and a sampling date of 31 December 2024 (row 18).

- return on working capital = working capital x nominal WACC.

Under the margin approach, we typically use an earnings before interest and tax (EBIT) margin based on the financial statements of similar businesses in the market, The Valuer General is a monopoly business with very stable and predictable cash flows, unlike businesses in the private market.

An EBIT margin would likely include a reward for a higher level of risk than faced by the Valuer General (due to more unstable cash flows than the Valuer General). In addition, it may include a return on capital expenditure which these businesses would have funded from their own resources. Using an EBIT margin would implicitly compensate the Valuer General for capital expenditure that has been grant funded. We estimate that a margin of more than 3.3% would overcompensate the Valuer General.

8 Pricing structure and prices

Draft decisions

8. To set a price for all councils of $7.86 ($2024-25) per valuation from 1 July 2025 (to be adjusted for inflation).

9. To increase the price by CPI on 1 July each year for the remainder of the determination period.

Under the 2019 determination, different prices are charged to councils based on which of 4 geographic zones the council is in: country, coastal, metropolitan and Sydney City. The zonal structure was designed to reflect the difference in mass valuation costs between zones at that time. We consider zone-based prices are no longer adequately cost reflective due to changes to the Valuer General's operating model to bring some valuations inhouse, and the uncertainly around mass valuation contract costs over the 4-year determination period.

Our draft decision is to adopt a postage stamp pricing structure from 1 July 2025, where all councils pay the same price. We have made this decision in the absence of an alternative, more cost-reflective pricing structure that could be implemented by 1 July 2025. We seek comments on whether a pricing structure based on the risk-ratings used by the Valuer General could provide a suitable cost-reflective alternative to zone-based prices.

8.1 The Valuer General proposed zone-based prices

The Valuer General proposed to continue the zone-based pricing structure introduced in 2019. It proposed price increases of between 21% and 38% before inflation, as shown in Table 8.1. It proposed to increase prices by CPI on 1 July each year from 2026.

Table 8.1 Valuer General's Proposed Prices ($2024-25)

Zone	Current price 2024-25	Proposed price from 1 July 2025	Difference (%)
Country	9.16	11.62	27%
Coastal	7.80	10.80	38%
Metro	7.20	9.44	31%
Sydney City	14.89	18.09	21%
Average	7.91	10.45	32%

Source: Valuer General proposal, p.9 IPART analysis.

8.2 Stakeholders expressed concerns with the proposed price increases and had mixed views on the pricing structure

Submissions expressed varied views on whether the zonal pricing structure should be retained. Some councils, mostly in the metro zone (which currently has the lowest prices), responded that the current zonal structure should be retained. Several stakeholders questioned whether the hybrid model negated the validity of the zonal pricing model.[42] We heard from some councils that the zonal structure should be retained but with some changes. For example, submissions asked for more detailed categorisation of councils within the pricing framework.[43]

8.3 We propose a single (postage stamp) price

The price per valuation is determined by dividing the revenue requirement by the number of valuations each year.

Our draft decision is to adopt a postage stamp pricing structure. Our draft prices are on average 0.7% lower than current prices (before inflation). Metropolitan and coastal councils will face increases of 9.2% and 0.8% respectively, while country councils and Sydney City will experience decreases (Table 8.2).

Table 8.2 Current and draft decision prices before inflation ($2024-25)

	Current price $	Draft price before inflation $	Difference before inflation %
Zone 1 - Country	9.16	7.86	-14.2%
Zone 2 – Coastal	7.80	7.86	0.8%
Zone 3 – Metropolitan	7.20	7.86	9.2%
Zone 4 - Sydney City	14.89	7.86	-47.2%
Average (weighted)	7.91	7.86	-0.7%

Source: IPART analysis.

8.3.1 Zone-based pricing is no longer cost reflective

When considering pricing structures, we aim to ensure that prices allocate the costs of the services between councils in line with the costs generated by each council. A cost reflective price structure should result in councils that impose similar costs on the system, paying similar prices. In addition to cost reflectivity, we have taken into account the ease of implementation, transparency and price stability of potential price structures.

The 2019 determination zonal structure was designed to reflect the difference in mass valuation costs between zones, which was known with a high degree of certainty based on market tested outcomes.[44] Mass valuations were contracted out and the market-tested contract prices were known in advance.[45]

In contrast, for prices from 1 July 2025 there is uncertainty around the mass valuation costs in different pricing zones.

To set zone-based prices, we would need to know how much of (councils' share of) the total allowance should be recovered from each pricing zone. There is uncertainty around this due to the Valuer General's hybrid valuation model, where some areas will be valued in-house and others by external contractors (see Chapter 2). In addition, external contracts are due for renewal over the course of the 4-year determination period and the relative contract prices in the 3 remaining zones are unknown.

8.3.2 Risk-based pricing could provide a future approach

We consider a risked-based pricing structure may provide an alternative cost-reflective approach to pricing.

All properties valued by the Valuer General are assigned a risk rating.[46] Risk Rating 1 (RR1) properties are the highest risk, most complex and therefore most costly to value. Risk Rating 3 (RR3) properties are the lowest risk and least costly to value. In addition, while all properties need to be valued every year, their risk rating determines how often the values need to be verified (reviewed). RR1 properties need to be verified each year; RR2 properties need to be verified every 3 years, and RR3 properties need to be verified every 5 years. In our 2019 report, we found that RR1 properties can cost more to value than RR3 properties because of the complexity and frequency of valuations.[47]

Risk ratings are not the only driver of the cost of valuing different areas of land. Cost is also influenced by location and other property aspects.

A risk rating price model would be cost reflective to the extent that it would capture a key driver of the cost of valuations in each council area, based on the property mix. However, the accuracy of this approach depends on the quality of the information we would use to calculate the cost differential between the risk ratings (RR1 versus RR2 versus RR3 costs). While the Valuer General can provide accurate information on the risk rating profile of each council, we do not have good information on the relative ratings cost of RR1, RR2 and RR3 properties. Before we could set risk-based prices we would need to better understand the costs underlying the different risk ratings.

If we adopted a risk-based pricing structure in the future, we may require Value NSW to provide an annual list of properties to each council with risk ratings. The list should also include an explanation of any changes in the risk ratings from the previous list.

Seek Comment

2. Implementing a risk-based pricing structure in a future determination would require the Valuer General to take steps to capture unit mass valuation costs by risk rating. Would you support this and what are the advantages and disadvantages of this approach?

8.3.3 Postage stamp pricing is the best available option at this time

On balance, our draft decision is to adopt a postage stamp price because risk-based pricing is not feasible at this time and we have reduced confidence in the continuing cost-reflectivity of zone-based prices.

Postage stamp pricing has the advantage of being simple. Under the Local Government Act, councils are required to use the mass valuations from the Valuer General to set rates. Councils are price takers and have little capacity to reduce the costs associated with providing a valuation.

8.4 We propose a step change on 1 July 2025 then increase by CPI

Our draft decision is to implement a postage stamp pricing structure in full on 1 July 2025, rather than transition from current prices to postage stamp prices over the determination period. We assess that the gains for country councils are greater than the impacts on metropolitan councils (see Table 8.3). Metropolitan councils remain better off under IPART's pricing proposal compared to the Valuer General's proposal

Our draft decision is to hold maximum prices constant in real terms over the determination period. After the initial price change on 1 July 2025, prices will increase by CPI on 1 July each subsequent year of the determination period. To increase prices, we will use the Australia-wide CPI[z] over the year to March, lagged by one year. For example, prices from 1 July 2025 will be increased by

(1) $$\$7.86\ x\ (CPI\ to\ March\ 2025\ \div CPI\ to\ March\ 2024)$$

8.5 We propose to accept the Valuer General's forecast valuation quantities

Our draft decision is to accept the Valuer General's forecast of 0.75% increase in property valuations per annum. The Valuer General based this assumption on the historical increase in the number of properties over the last determination period. Our 2019 determination forecasted a 0.71% increase in property valuations, which is similar to the 0.75% that occurred over the period.

Our draft prices are on average slightly lower than current prices in real terms (before inflation) despite an increase in average annual costs because valuations are forecast to grow more rapidly than costs (0.75% per year compared to around 0.53% per year, on average).

We do not have other sources of data to forecast changes in the number of properties valued by the Valuer General. The NSW State Government issues a population forecast with an implied dwelling demand each year.[aa] However, increases in dwellings are not necessarily correlated with the increase in properties valued by the Valuer General. For example, in medium and high-density residential development such as an apartment building, there may be only one property but many dwellings. Furthermore, this forecast does not account for growth in other property types such as industrial, commercial, and agricultural properties.

[z] The Australia-wide CPI measures inflation across 8 capital cities, including Sydney. We use it in preference to the Sydney CPI because we consider non-metropolitan councils may have more in common with the smaller capital cities. The CPI is available on the Australian Bureau of Statistics' website.

[aa] Department of Planning, Housing and Infrastructure 2024 NSW Population Projections

8.6 Our draft prices impact councils

We investigated the impact on councils of our pricing decisions by evaluating the increase to each council's bill. Under our draft prices, the council groupings that experience bill increases[bb] are coastal (0.8%) and metropolitan councils (9.2%) (Table 8.3). We also estimated how much the valuation bill represents of each councils' income from rates.[cc]

A detailed breakdown of this analysis per council is in Appendix D.

For coastal councils the valuation bill as a share of rates income ranges between 0.2% and 0.6%, and for metropolitan councils it ranges between 0.1% and 0.5% (Table 8.3). Therefore, the average 0.8% increase in the valuation bill for coastal councils will increase the valuations bill's share of rates income by at most 0.005%. For metropolitan councils, the bill increase of 9.2% will increase the valuations bill's share by at most 0.046%.

For example, in Appendix D, the coastal council with the highest 2024-25 valuation bill as a percentage of its rates income is Nambucca Valley Council - with 0.61%. Under our draft decision, the share remains unchanged at 0.61% (rounded). The metropolitan council with the highest 2024-25 valuation bill as a percentage of its rates income is The Hills Shire Council - with 0.50%. Under our draft decision, the share will increase to 0.52% (rounded)[dd].

Country councils will all be better off because bills will fall by 14.2% (before inflation, see Appendix D).

Table 8.3 Impact on average council bills of draft prices (before inflation)

	Average bill with current price $2024-25	Average bill with draft price $2024-25	Impact on council bills %	Bill as a share of rates income – range %
Zone 1 - Country	79,109	67,882	-14.2%	0.2%-1.6%
Zone 2 – Coastal	261,936	263,951	0.8%	0.2%-0.6%
Zone 3 – Metro	282,839	308,766	9.2%	0.1%-0.5%
Zone 4 - Sydney City	418,915	221,133	-47.2%	0.1%

Note: We show the impact on councils' bills due to the change in price only (i.e. for the same number of valuations). We use councils' TPI as a variable for income from rates. The bill as share of rates incomes is for 2025-26, using our draft prices. Rates income in 2025-26 has been adjusted down for inflation.
Source: IPART analysis

In Table 8.4 we extract the top 3 councils with the greatest bill impacts as a share of their income from rates. The impact of our draft decisions means that some councils – especially country - will have bill reductions of up to 0.31% of their rates income.

The highest bill increase is 0.03% of rates income, for Fairfield Council.

bb We assess the impact on councils' bills for a constant number of valuations.

cc For our calculations including rates income we have used Total Permissible Income (TPI) – this is equivalent to a council's income from rates as varied under the rate peg and/or a special variation. It includes other small fees and charges.

dd Numbers may not sum due to rounding

Table 8.4 Overview of impacts on Councils' bills ($nominal)

	Zone	Current Bill $	2025-26 Bill $	Difference $	Difference %	Change in bill share of rates income %
Top 3 councils with bill decreases						
Central Darling	Country	17,212	14,769	-2,443	-14.2%	-0.31%
Coolamon	Country	28,790	24,704	-4,086	-14.2%	-0.18%
Narrandera	Country	35,055	30,080	-4,975	-14.2%	-0.16%
Top 3 councils with bill increases						
Fairfield	Metro	389,038	424,699	35,662	9.2%	0.03%
Hawkesbury	Metro	188,510	205,791	17,280	9.2%	0.03%
Hills	Metro	449,532	490,739	41,207	9.2%	0.03%

Note: We show the impact on councils' bills due to the change in draft price only (i.e. for the same number of valuations). We use councils' total permissible income (TPI) as the measure income from rates. The bill as share of rates incomes is for 2025-26, using our draft prices. Rates income in 2025-26 has been adjusted down for inflation to maintain consistency between prices and rates income.
Source: IPART analysis

Implementing postage stamp prices will reduce the valuation bill for Sydney City by around $198,000 (47%, before inflation). Sydney City was charged a much higher price than other council groupings under the 4-zone price model due to valuation complexities relating to its property types and uniqueness. We consider that including Sydney City into the postage stamp price applied to all councils will not significantly impact other councils. The bill reduction that Sydney City experiences will be spread across all other councils. The bill impact as a share of Sydney City Council rates income remains relatively steady at -0.06% (Table 8.5).

Table 8.5 Proposed Sydney City bill impact ($nominal)

	Zone	Current Bill $	2025-26 Bill $	Difference $	Difference %	Change in bill share of rates income %
Sydney City	Sydney City	418,915	221,133	-197,782	-47.2%	-0.06%

Note: We show the impact on councils' bills due to the change in price only (i.e. for the same number of valuations). We use councils' TPI as a variable for income. The bill as share of rates incomes is for 2025-26, using our draft prices. Rates income in 2025-26 has been adjusted down for inflation.
Source: IPART analysis.

8.7 The impact of draft prices on ratepayers

8.7.1 Stakeholders were concerned about the impact of the Valuer General's pricing proposal on their rates

In our consultation, ratepayers expressed concerns about the potential flow on effects of the Valuer General's pricing proposal to the affordability of council rates. They suggested that these would lead to financial hardship for ratepayers and cited cost of living pressures.

8.7.2 Our draft prices will have minimal impact on ratepayers

In coming to our draft decision, we have considered the social impacts and effect on general price inflation, as required by the IPART Act. We have evaluated the impact of the draft prices on rates and the ability for councils to provide services. We consider that this impact on ratepayers should be limited.

For ratepayers there is no immediate impact on rates because the 2025-26 rate peg has already been set.[ee] Beyond 2025-26, under our new rate peg methodology[48] the rate peg may include an adjustment factor for Valuer General prices. This would have an impact on rates.

We consider that the potential impact on services and/or rates is minimal, because the share of the valuation bill in rates income under our draft decision prices is small. For example, the share varies between 0.2% to 1.6% for Country councils and 0.1% to 0.5% for the metropolitan councils. The average valuation bill for each council grouping, as a percentage of rates, is between 0.06% and 0.43% (Table 8.3 and Appendix D).

The potential impact on services and/or rates under our draft decision prices are smaller than under the Valuer General's proposed prices.

However, we are aware of issues around the financial sustainability of councils and the recent Parliamentary Inquiry into the ability of councils to fund infrastructure and services.

[ee] IPART usually sets the rate peg in the September or October before implementation on 1 July. The rate peg for 2024-25 is available on our website.

9 Other Relevant Matters

While setting maximum land valuation service prices for councils, we have identified a number of matters that may have an impact on future costs. We consider these under our terms of reference[ff] and section 13(4)[gg] of the IPART Act.

These include issues raised by stakeholders that are not required for IPART to deliver this pricing determination. However, these areas require more information and clarity, as their importance may increase and they may warrant consideration in a subsequent determination.

Issues raised by stakeholders include:

- possible double charging for the valuation of Commonwealth land
- increasing numbers of objections leading to increased costs.

9.1 Issues raised by stakeholders

9.1.1 Valuation of Commonwealth land

Our understanding is that the Valuer General is obliged to value Commonwealth lands annually in accordance with s 14A(1) of the Valuation of Land Act.[hh] However, the Valuer General does not have to provide councils with valuation information about Commonwealth lands as they are not rateable.[ii]

These properties include homes owned by Defence Housing Australia, whose residents benefit from full council services. We have been advised that these valuations were used by some councils, ex gratia, to receive rate equivalent income from the Commonwealth[jj].

We understand that historically, these valuations have been provided to councils as part of the standard valuation register. They have been included in IPART's previous calculation of efficient costs and part of the monopoly service provided to councils.

ff TOR advise that IPART may 'take into account any other matters it considers relevant'

gg Tribunal may also report to the Minister on any matter it considers relevant that arises from an investigation

hh Under section 14A(1)(a) of the *Valuation of Land Act 1916* (VOL Act), the Valuer General is not required to value the 'lands of the Crown' every year. However, section 13 of the *Interpretation Act 1987* provides that in NSW legislation, a reference to the Crown is a reference to the Crown in right of New South Wales, not a reference to the Crown in right of the Commonwealth. Therefore, Commonwealth lands are subject to the general requirement for annual valuations under section 14A(1).

ii Sections 47(1), 47(1A) and 48(1) of the VOL Act collectively provide that the Valuer General must provide councils with the information entered into the Register of Land Values as it relates to rateable land within that council's area. There is no corresponding requirement in the VOL Act for the Valuer General to provide valuation information about non-rateable lands to councils.

jj Competitive neutrality requires that government business activities should not enjoy net competitive advantages over their private sector competitors simply by virtue of public sector ownership. Commonwealth Competitive Neutrality Policy Statement June 1996.

Since July 2024, the Valuer General has ceased to provide councils with valuations for Commonwealth owned properties in mass valuation lists.[kk]. We understand that the Valuer General has commenced charging councils individually for each Commonwealth owned property as a private valuation under s 9A of the VOL Act. This has resulted in some councils incurring additional costs.

Box 9.1 Queanbeyan- Palerang Regional Council Case Study

On 24 October 2024, the NSW Valuer General notified the council that all Commonwealth owned property will no longer have a rateable value. Queanbeyan-Palerang Regional Council assessed that it would lose rates income associated with those properties.

In the subsequent supplementary valuation list provided to council, 43 of 68 Commonwealth owned properties within the local government area had their land value cancelled, backdated for 2 financial years.

The council estimates that if all Commonwealth properties have their land values cancelled, it will lose estimated rates income of $191,000 (2025-26).

Source: Queanbeyan-Palerang Regional Council, Meeting Agenda 27 November 2024, Item 9.15, p51

We understand that from around October 2024, when delivering these valuations to councils the Valuer General will be undertaking a separate valuation of the property at an additional cost.

Some Councils have raised concerns around having to pay separately for these services when previously they were bundled in their mass valuations. Councils should not pay twice for the same services.

Seek Comment

3. We invite councils to provide information on their experiences with recent changes to services provided for Commonwealth land valuations.

9.1.2 Increased objection costs

Objections are a landowner right under the VOL Act. Landowners can object because land values are incorrect, or because there are errors in the land valuations such as apportionment or allowances. Objections are generally less than 1% of valuations annually. Objection costs have increased as a percentage of operating costs from 7% in 2014 to 14% in the current review.[49]

[kk] See letter addressed to Queanbeyan-Palerang Regional Council from Value NSW. Page 55 of Meeting Agenda for ordinary council meeting on 27 November 2024.

Under section 35B of the VOL Act, the Valuer General must accept all objections that are duly made and must allow or disallow an objection. IPART is not aware of a legal mechanism in the VOL Act for the Valuer General to directly charge objectors for objections. We are not aware of any other state charging for objections.

On a yearly basis between 12% to 30% of all registered objections result in a land revaluation although it is unclear how many objections seek a revaluation each year.[50]

IPART has been advised that there are instances where some parties lodge an objection each year. Being able to lodge an objection is an important safeguard to land owners. However unnecessary objections can lead to increased costs.

We consider that there may be opportunities for the Valuer General to reduce the costs incurred through the objections process. These may include:

- information provided to landowners
- increased data and transparency on objections
- investigate regulatory change that would allow the Valuer General to charge a nominal fee for repeat objections (akin to an application fee under the GIPA Act).

With the rise in objection costs, improving transparency is seen as essential for monitoring expenses and understanding the reasons behind these increases.

Seek Comment

4. Given the rising cost of objections, which flows through to prices paid by councils, should the Valuer General investigate ways to reduce the number of objections?

Appendices

A Terms of Reference

Price review of rating valuation services provided by the Valuer General to Local Government – Terms of Reference

I Chris Minns, Premier of New South Wales, under section 12 of the Independent Pricing and Regulatory Tribunal Act 1992 (IPART Act), refer the matter set out in these 'terms of reference' to the Independent Pricing and Regulatory Tribunal (IPART) for investigation and report.

Background

By the Government Pricing Tribunal (Valuer-General's Services) Order dated 11 August 1993 made under section 4 of the IPART Act, the following services provided by the Valuer-General were declared as government monopoly services:

> "Furnishing valuation lists and supplementary lists under Part 5 of the Valuation of Land Act 1916 by the Valuer-General to a council of an area under the Local Government Act 1993" (**Monopoly Services**).

In October 2018, the Premier requested that, pursuant to section 12 of the IPART Act, IPART make a determination of the pricing for the provision of the Monopoly Services to apply for a period of 6 years.

In May 2019, IPART released its determination of maximum prices for the Monopoly Services provided by the Valuer General. These maximum prices apply until 30 June 2025.

Reference to the Tribunal

IPART is requested by the Premier, under sections 12(1) and (3) of the IPART Act, to investigate and report on the determination of the maximum prices for the Monopoly Services provided by the Valuer-General to apply in total for a period of 6 years (**Referral Period**). Under section 12(3) of the IPART Act, this referral may extend to an annual or other periodic determination of the pricing of the Monopoly Services during the Referral Period.

Matters for consideration

In its investigation, IPART should:

- consider and identify the Valuer-General's efficient costs of providing the Monopoly Services over the relevant determination period or periods;
- consider valuation service market-based factors over the determination period and identify where appropriate interim period adjustment parameters where unforeseen or unavoidable external costs may be incurred; and
- consider the efficient allocation of the costs of the Monopoly Services between the users of those services in accordance with relevant economic and pricing principles.

In addition, IPART may take into account any other matters it considers relevant.

Consultation

IPART must undertake such consultation as is required under the IPART Act and may undertake such further consultation as it considers appropriate, including with key stakeholders such as government agencies responsible for management of the land valuation and rating systems.

Reporting

IPART is to submit its final report and determination to the Premier within 9 months of the receipt by IPART of the final Terms of Reference and is to submit any subsequent reports and determinations to the Premier on such other date or dates as agreed.

Determination commencement

It is intended that the determination or, in the event of a periodic determination of pricing, the first determination, will commence on 1 July 2025.

B Matters to be considered by IPART under section 15(1) of the IPART Act

IPART is required under section 15(1) of the IPART Act to have regard to the following matters in making determinations and recommendations:

a. the cost of providing the services concerned

b. the protection of consumers from abuses of monopoly power in terms of prices, pricing policies and standard of services

c. the appropriate rate of return on public sector assets, including appropriate payment of dividends to the Government for the benefit of the people of New South Wales

d. the effect on general price inflation over the medium term

e. the need for greater efficiency in the supply of services so as to reduce costs for the benefit of consumers and taxpayers

f. the need to maintain ecologically sustainable development (within the meaning of section 6 of the Protection of the *Environmental Administration Act 1991*) by appropriate pricing policies that take account of all the feasible options available to protect the environment

g. the impact on pricing policies of borrowing, capital and dividend requirements of the government agency concerned and, in particular, the impact of any need to renew or increase relevant assets

h. the impact on pricing policies of any arrangements that the government agency concerned has entered into for the exercise of its functions by some other person or body

i. the need to promote competition in the supply of services concerned

j. considerations of demand management (including levels of demand) and least cost planning

k. the social impact of the determinations and recommendations

l. standards of quality, reliability and safety of the services concerned (whether those standards are specified by legislation, agreement or otherwise).

Furthermore, under section 13(4), IPART may also report to the Minister on any matter it considers relevant that arises from this investigation.

Table B.1 Consideration of section 15(1) matters by IPART

Section 15(1)	Report reference
a. Cost of providing the services	Chapter 5 sets out IPART's draft decision of the Valuer General's total efficient costs to deliver its regulated services over the determination period. Further detail is provided in Chapter 2 on historical and forecast expenditure,
b. Protection of consumers from abuses of monopoly power in terms of prices, pricing policies and standard of services	Our decisions will protect consumers from abuses of monopoly power, as they reflect the efficient costs the Valuer General requires to deliver its regulated services to councils. This is addressed throughout the report, particularly in Chapter 3 (where we establish the efficient expenditure) and Chapter 8 (where we set out our pricing decisions and impacts).

Section 15(1)		Report reference
		Our draft decision to set a 4 year determination will enable an assessment of the impact of the hybrid model to be made on the valuation market and on the service being provided to councils.
c.	Appropriate rate of return on public sector assets, including appropriate payment of dividends to the Government for the benefit of the people of New South Wales	Chapter 7 outlines our analysis of the regulatory asset base and costs of capital. The Valuer General's sole remaining asset is software, and the majority of its costs are operating costs. We use a weighted average cost of capital (WACC) to calculate the return on RAB and the working capital allowance.
d.	Effect on general price inflation over the medium term	Chapter 8 outlines that we estimate the impact of our prices on general inflation is negligible.
e.	Need for greater efficiency in the supply of services so as to reduce costs for the benefit of consumers and taxpayers	Chapter 5 set out our decisions on the Valuer General's efficient costs. These decisions should promote greater efficiency in the supply of Valuer General's regulated services.
f.	The need to maintain ecologically sustainable development (within the meaning of section 6 of the *Protection of the Environment Administration Act 1991*) by appropriate pricing policies that take account of all the feasible options available to protect the environment	Chapter 5 sets out the Valuer efficient historical and forecast expenditure that allows it to meet all its regulatory requirements, including its environmental obligations.
g.	The impact on pricing policies of borrowing, capital and dividend requirements of the government agency concerned and, in particular, the impact of any need to renew or increase relevant assets	Chapter 8 explains how we have provided the Valuer General with an allowance for a return on and of capital; and our assessment of its capital needs.
h.	The impact on pricing policies of any arrangements that the government agency concerned has entered into for the exercise of its functions by some other person or body	Chapters 2 and 5 discuss the shifts in the Valuer General's mode of operation. We have recommended a shorter determination to address uncertainty in the costs estimates. The new mode of operations has created uncertainty in predicting future costs.
i.	The need to promote competition in the supply of the services concerned	In determining efficient costs, we were mindful of relevant principles such as competitive neutrality (e.g. we included a tax allowance for the Valuer General as set out in Chapter 7).
j.	Considerations of demand management (including levels of demand) and least cost planning	The Valuer General is not subject to fluctuating demand in valuations, but objections are variable over time. Chapter 5 discusses the changes in the objections cycle and recommends that there may need to be consideration to manage objection costs.
k.	The social impact of the determinations and recommendations	Chapter 8 considers the potential impact of our pricing decisions on councils and ratepayers. The impact on rate payers and councils are considered minor.
l.	Standards of quality, reliability and safety of the services concerned (whether those standards are specified by legislation, agreement or otherwise)	Chapter 4 details our discussion on the decision to reduce the determination period to 4 years. A shorter determination should allow the Valuer General to embed new processes and structure. IPART will be able to review the performance of the operation at that stage.

B.1 Considerations under section 16 of the IPART Act

Section 16 of the IPART Act provides:

> If the Tribunal determines to increase the maximum price for a government monopoly service or determines a methodology that would or might increase the maximum price for a government monopoly service, the Tribunal is required to assess and report on the likely annual cost to the Consolidated Fund if the price were not increased to the maximum permitted and the government agency concerned were to be compensated for the revenue foregone by an appropriation from the Consolidated Fund.

Under section 16 of the IPART Act, we must report on the likely impact on the Consolidated Fund if prices are not increased to the maximum levels permitted.

If the Valuer General decided to maintain the 4-zone pricing structure and prices, it will be limited by our maximum price as set out in this determination. We have assessed that the impact will be a reduction of income of $3.5 million over the determination period (before inflation) as shown in Table B.2.

Table B.2 Impact on revenue of maintaining the 4-zone pricing structure ($2024-25)

	Current price $/valuation	Maximum Price $/valuation	Price charged $/valuation	Difference $	Reduced Income $ millions
Zone 1 - Country	9.16	7.86	7.86	-	0.0
Zone 2 – Coastal	7.80	7.86	7.80	-0.06	-0.2
Zone 3 – Metro	7.20	7.86	7.20	-0.66	-3.3
Zone 4 - Sydney City	14.89	7.86	7.86	0.00	0.0
Total		na	na	na	-3.5

Note: This is just one of the ways that the Valuer General could implement a pricing structure beneath the maximum level allowed.
Source: IPART analysis.

C Glossary

Term	Description
2019 Determination	Refers to the current price period – i.e. prices from 1 July 2019 to 30 June 2025 under *IPART's Review of prices for land valuation services provided by the Valuer-General to councils from 1 July 2019 to 30 June 2025*
2025 Determination	Refers to the upcoming price period – i.e. prices from 1 July 2025 to 30 June 2029 (unless the 2025 Determination is replaced by a subsequent determination during the referral period)
ABS	Australian Bureau of Statistics
Council	Councils has the meaning given to that term under the Local Government Act 1993
Declared services	The services declared to be government monopoly services under the Government Pricing Tribunal (Valuer-General's Services) Order 1993 (Gazette No. 89, 13 August 1993, page 4571): "Furnishing valuation lists and supplementary lists under Part 5 of the Valuation of Land Act 1916 by the Valuer General to a council of an area under the Local Government Act 1993
DCS	Department of Customer Service
DPHI	Department of Planning Housing and Infrastructure
Efficient costs	The effective use of resources for the lowest cost that allows for the delivery of quality products.
Determination	The period that IPART sets prices for
IPART	The Independent Pricing and Regulatory Tribunal of NSW
IPART Act	Independent Pricing and Regulatory Tribunal Act 1992 (NSW)
Local Government Act	Local Government Act 1993 (NSW)
Mass valuation	Method used to value bulk properties, where similar properties are grouped into components.
Mass valuation contract	External contracts to undertake mass valuations for the Valuer General
NPV	Net present value
NRR	Notional revenue requirement
Objections	A lodgement disagreeing with a land valuation
RAB	Regulatory asset base
Rating and Taxing Valuations	Business area that undertakes mass valuations and supplementary valuations.
RBA	Reserve Bank of Australia
Referral period	The period over which the determination(s) is to apply – i.e. from 1 July 2025 to 30 June 2031. The ToR require that new determination(s) of maximum pricing for the Valuer General's land valuation services to councils apply in total for a period of six years.
Required revenue (notional revenue requirement)	This is the amount of revenue that must be earnt to cover efficient costs.
Supplementary valuations	A valuation outside the usual three-year cycle when changes to properties are recorded on the Register of Land Values.
Total Permissible Income (TPI)	Total Permissible Income is the notional general income of a council for the previous year as varied by the percentage (if any) applicable to the council under the rate peg or a special variation, as adjusted for supplementary valuations and estimates of increases in land value from the Valuer-General.
VOL Act	Valuation of Land Act 1916 (NSW)
Valuer General (VG)	An independent statutory officer appointed by the Governor of New South Wales to oversee the valuation system.
WACC	Weighted average cost of capital

D Council impacts

Table D.1 Council Impacts ($2024-25)

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Albury	Country	226	287	194	9.16	11.62	7.86	0.45%	0.56%	0.38%
Armidale Regional	Country	121	153	103	9.16	11.62	7.86	0.50%	0.56%	0.38%
Ballina	Coastal	132	183	133	7.80	10.80	7.86	0.46%	0.63%	0.46%
Balranald	Country	15	19	13	9.16	11.62	7.86	0.44%	0.54%	0.37%
Bathurst Regional	Country	184	233	158	9.16	11.62	7.86	0.58%	0.72%	0.49%
Bayside	Metro	238	312	259	7.20	9.44	7.86	0.23%	0.29%	0.24%
Bega Valley	Coastal	152	210	153	7.80	10.80	7.86	0.55%	0.75%	0.55%
Bellingen	Coastal	50	69	50	7.80	10.80	7.86	0.50%	0.66%	0.48%
Berrigan	Country	48	61	41	9.16	11.62	7.86	0.80%	1.00%	0.68%
Blacktown	Metro	897	1,177	980	7.20	9.44	7.86	0.43%	0.54%	0.45%
Bland	Country	41	51	35	9.16	11.62	7.86	0.54%	0.68%	0.46%
Blayney	Country	39	50	34	9.16	11.62	7.86	0.39%	0.46%	0.31%
Blue Mountains	Metro	268	352	293	7.20	9.44	7.86	0.35%	0.45%	0.38%
Bogan	Country	20	25	17	9.16	11.62	7.86	0.61%	0.76%	0.51%
Bourke	Country	19	24	16	9.16	11.62	7.86	0.90%	1.11%	0.75%
Brewarrina	Country	11	14	9	9.16	11.62	7.86	0.90%	1.11%	0.75%
Broken Hill	Country	96	122	83	9.16	11.62	7.86	0.55%	0.68%	0.46%
Burwood	Metro	56	73	61	7.20	9.44	7.86	0.19%	0.23%	0.19%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Byron	Coastal	109	150	110	7.80	10.80	7.86	0.37%	0.50%	0.36%
Cabonne	Country	68	86	58	9.16	11.62	7.86	0.59%	0.73%	0.49%
Camden	Metro	329	431	359	7.20	9.44	7.86	0.42%	0.53%	0.44%
Campbelltown	Metro	415	544	453	7.20	9.44	7.86	0.39%	0.50%	0.41%
Canada Bay	Metro	131	172	143	7.20	9.44	7.86	0.26%	0.34%	0.28%
Canterbury-Bankstown	Metro	644	845	703	7.20	9.44	7.86	0.31%	0.39%	0.32%
Carrathool	Country	19	24	16	9.16	11.62	7.86	0.51%	0.64%	0.43%
Central Coast	Coastal	1,003	1,389	1,011	7.80	10.80	7.86	0.47%	0.64%	0.47%
Central Darling	Country	17.2	21.8	14.8	9.16	11.62	7.86	1.88%	2.32%	1.57%
Cessnock	Country	269	341	231	9.16	11.62	7.86	0.56%	0.70%	0.47%
Clarence Valley	Coastal	211	292	212	7.80	10.80	7.86	0.51%	0.69%	0.50%
Cobar	Country	30	38	25	9.16	11.62	7.86	0.67%	0.83%	0.56%
Coffs Harbour	Coastal	227	315	229	7.80	10.80	7.86	0.43%	0.58%	0.42%
Coolamon	Country	28.8	36.5	24.7	9.16	11.62	7.86	1.05%	1.29%	0.87%
Coonamble	Country	25	32	22	9.16	11.62	7.86	0.47%	0.58%	0.39%
Cootamundra-Gundagai Regional	Country	61	78	53	9.16	11.62	7.86	0.55%	0.68%	0.46%
Cowra	Country	69	88	59	9.16	11.62	7.86	0.88%	1.10%	0.74%
Cumberland	Metro	369	484	403	7.20	9.44	7.86	0.34%	0.42%	0.35%
Dubbo Regional	Country	227	289	195	9.16	11.62	7.86	0.52%	0.65%	0.44%
Dungog	Country	50	63	43	9.16	11.62	7.86	0.48%	0.60%	0.41%
Edward River	Country	48	61	41	9.16	11.62	7.86	0.58%	0.71%	0.48%
Eurobodalla	Coastal	196	271	197	7.80	10.80	7.86	0.56%	0.77%	0.56%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Fairfield	Metro	389	510	425	7.20	9.44	7.86	0.41%	0.54%	0.45%
Federation	Country	72	92	62	9.16	11.62	7.86	0.66%	0.81%	0.55%
Forbes	Country	51	65	44	9.16	11.62	7.86	0.60%	0.74%	0.50%
Georges River	Metro	258	339	282	7.20	9.44	7.86	0.31%	0.39%	0.32%
Gilgandra	Country	24	30	21	9.16	11.62	7.86	0.42%	0.52%	0.36%
Glen Innes Severn	Country	50	63	43	9.16	11.62	7.86	0.64%	0.79%	0.54%
Goulburn Mulwaree	Country	152	193	130	9.16	11.62	7.86	0.64%	0.79%	0.54%
Greater Hume	Country	66	83	56	9.16	11.62	7.86	0.65%	0.81%	0.55%
Griffith	Country	104	132	89	9.16	11.62	7.86	0.53%	0.62%	0.42%
Gunnedah	Country	60	76	51	9.16	11.62	7.86	0.39%	0.49%	0.33%
Gwydir	Country	31	39	26	9.16	11.62	7.86	0.34%	0.43%	0.29%
Hawkesbury	Metro	189	247	206	7.20	9.44	7.86	0.41%	0.52%	0.44%
Hay	Country	18	22	15	9.16	11.62	7.86	0.64%	0.80%	0.54%
Hilltops	Country	108	137	92	9.16	11.62	7.86	0.71%	0.89%	0.60%
Hornsby	Metro	299	392	326	7.20	9.44	7.86	0.36%	0.46%	0.38%
Hunters Hill	Metro	27	35	29	7.20	9.44	7.86	0.24%	0.30%	0.25%
Inner West	Metro	371	486	405	7.20	9.44	7.86	0.28%	0.36%	0.30%
Inverell	Country	82	104	70	9.16	11.62	7.86	0.52%	0.65%	0.44%
Junee	Country	29	37	25	9.16	11.62	7.86	0.56%	0.68%	0.46%
Kempsey	Coastal	118	163	119	7.80	10.80	7.86	0.50%	0.61%	0.45%
Kiama	Coastal	76	105	76	7.80	10.80	7.86	0.36%	0.50%	0.36%
Ku-ring-gai	Metro	242	317	264	7.20	9.44	7.86	0.32%	0.41%	0.34%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Kyogle	Coastal	43	59	43	7.80	10.80	7.86	0.51%	0.70%	0.51%
Lachlan	Country	41	52	35	9.16	11.62	7.86	0.50%	0.62%	0.42%
Lake Macquarie	Coastal	665	921	670	7.80	10.80	7.86	0.42%	0.57%	0.41%
Lane Cove	Metro	56	74	61	7.20	9.44	7.86	0.19%	0.24%	0.20%
Leeton	Country	48	62	42	9.16	11.62	7.86	0.59%	0.73%	0.49%
Lismore	Coastal	147	204	149	7.80	10.80	7.86	0.43%	0.58%	0.42%
Lithgow	Country	111	141	96	9.16	11.62	7.86	0.51%	0.63%	0.43%
Liverpool	Metro	486	637	531	7.20	9.44	7.86	0.40%	0.50%	0.42%
Liverpool Plains	Country	42	53	36	9.16	11.62	7.86	0.44%	0.55%	0.37%
Lockhart	Country	25	31	21	9.16	11.62	7.86	0.89%	1.10%	0.75%
Maitland	Country	343	435	294	9.16	11.62	7.86	0.41%	0.50%	0.34%
Mid-Coast	Coastal	417	577	420	7.80	10.80	7.86	0.45%	0.61%	0.45%
Mid-Western Regional	Country	138	174	118	9.16	11.62	7.86	0.44%	0.55%	0.37%
Moree Plains	Country	62	79	53	9.16	11.62	7.86	0.24%	0.30%	0.20%
Mosman	Metro	50	65	54	7.20	9.44	7.86	0.22%	0.28%	0.23%
Murray River	Country	81	103	70	9.16	11.62	7.86	0.65%	0.80%	0.54%
Murrumbidgee (new)	Country	24	30	20	9.16	11.62	7.86	0.49%	0.61%	0.41%
Muswellbrook	Country	72	91	62	9.16	11.62	7.86	0.32%	0.41%	0.27%
Nambucca	Coastal	77	107	78	7.80	10.80	7.86	0.61%	0.83%	0.61%
Narrabri	Country	66	83	56	9.16	11.62	7.86	0.44%	0.55%	0.37%
Narrandera	Country	35.1	44.5	30.1	9.16	11.62	7.86	0.63%	0.70%	0.47%
Narromine	Country	33	42	28	9.16	11.62	7.86	0.51%	0.63%	0.43%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Newcastle	Coastal	460	637	464	7.80	10.80	7.86	0.25%	0.34%	0.25%
North Sydney	Metro	74	98	81	7.20	9.44	7.86	0.13%	0.16%	0.14%
Northern Beaches	Metro	495	649	540	7.20	9.44	7.86	0.26%	0.34%	0.28%
Oberon	Country	36	46	31	9.16	11.62	7.86	0.69%	0.85%	0.57%
Orange	Country	177	225	152	9.16	11.62	7.86	0.45%	0.56%	0.38%
Parkes	Country	77	98	66	9.16	11.62	7.86	0.49%	0.61%	0.41%
Parramatta (new)	Metro	353	463	386	7.20	9.44	7.86	0.21%	0.26%	0.22%
Penrith	Metro	485	636	529	7.20	9.44	7.86	0.32%	0.41%	0.34%
Port Macquarie-Hastings	Coastal	270	374	272	7.80	10.80	7.86	0.45%	0.62%	0.45%
Port Stephens	Coastal	247	342	249	7.80	10.80	7.86	0.47%	0.60%	0.44%
Queanbeyan-Palerang Regional	Country	233	296	200	9.16	11.62	7.86	0.45%	0.50%	0.34%
Randwick	Metro	192	251	209	7.20	9.44	7.86	0.19%	0.25%	0.20%
Richmond Valley	Coastal	82	114	83	7.80	10.80	7.86	0.51%	0.69%	0.50%
Ryde	Metro	190	250	208	7.20	9.44	7.86	0.23%	0.29%	0.24%
Shellharbour	Coastal	224	310	225	7.80	10.80	7.86	0.38%	0.52%	0.38%
Shoalhaven	Coastal	474	656	478	7.80	10.80	7.86	0.52%	0.72%	0.52%
Singleton	Country	101	129	87	9.16	11.62	7.86	0.40%	0.50%	0.34%
Snowy Monaro Regional	Country	132	167	113	9.16	11.62	7.86	0.65%	0.77%	0.52%
Snowy Valleys	Country	86	109	73	9.16	11.62	7.86	0.68%	0.85%	0.57%
Strathfield	Metro	53	70	58	7.20	9.44	7.86	0.20%	0.23%	0.19%
Sutherland	Metro	448	587	489	7.20	9.44	7.86	0.30%	0.38%	0.32%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Sydney	Sydney City	419	509	221	14.89	18.09	7.86	0.12%	0.15%	0.06%
Tamworth Regional	Country	268	340	230	9.16	11.62	7.86	0.63%	0.71%	0.48%
Temora	Country	36	45	31	9.16	11.62	7.86	0.79%	0.98%	0.66%
Tenterfield	Country	51	64	44	9.16	11.62	7.86	0.73%	0.90%	0.61%
The Hills	Metro	450	589	491	7.20	9.44	7.86	0.50%	0.63%	0.52%
Tweed	Coastal	249	345	251	7.80	10.80	7.86	0.33%	0.45%	0.33%
Upper Hunter	Country	74	93	63	9.16	11.62	7.86	0.59%	0.74%	0.50%
Upper Lachlan	Country	64	81	55	9.16	11.62	7.86	0.74%	0.91%	0.62%
Uralla	Country	29	37	25	9.16	11.62	7.86	0.67%	0.83%	0.56%
Wagga Wagga	Country	267	339	230	9.16	11.62	7.86	0.54%	0.67%	0.45%
Walcha	Country	18	22	15	9.16	11.62	7.86	0.34%	0.42%	0.28%
Walgett	Country	47	60	41	9.16	11.62	7.86	0.75%	0.93%	0.63%
Warren	Country	19	24	16	9.16	11.62	7.86	0.35%	0.44%	0.30%
Warrumbungle	Country	58	74	50	9.16	11.62	7.86	0.64%	0.80%	0.54%
Waverley	Metro	95	124	103	7.20	9.44	7.86	0.19%	0.24%	0.20%
Weddin	Country	26	32	22	9.16	11.62	7.86	0.81%	1.00%	0.68%
Wentworth	Country	42	53	36	9.16	11.62	7.86	0.69%	0.86%	0.58%
Willoughby	Metro	125	164	136	7.20	9.44	7.86	0.23%	0.30%	0.25%
Wingecarribee	Coastal	193	268	195	7.80	10.80	7.86	0.33%	0.45%	0.33%
Wollondilly	Coastal	173	240	174	7.80	10.80	7.86	0.38%	0.52%	0.38%
Wollongong	Coastal	553	766	557	7.80	10.80	7.86	0.29%	0.39%	0.29%
Woollahra	Metro	96	126	105	7.20	9.44	7.86	0.20%	0.25%	0.21%

Council	Zone	Valuation bill ($'000, $2024-25)			Prices ($/valuation, $2024-25)			Valuation bill as % Total Permissible Income (TPI)		
		Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)	Current (2024-25)	Proposed (2025-26)	Draft decision (2025-26)
Yass Valley	Country	77	98	66	9.16	11.62	7.86	0.61%	0.76%	0.51%

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[36] See submissions from IPART Review of prices for Valuer General's services to councils from 1 July 2025, LGNSW, p.7 and NSW Rev Professionals submission to IPART Call for Submissions Paper, November 2024, p5.
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