

# **ATTACHMENT 1**

## **Proposed Differential Rates 2025/2026 – Public Submissions**

1. Received on email 30/06/2025. Content and Officer response below:

Differential Rates Strategy

Reply

Reply All

Forward

Mon 30/06/2025 2:46 PM

Caution! This message was sent from outside your organization.

Submission:

I am making this submission as a neighbour to the Alinta Windfarm and as a neighbour to the Iluka Minesite.

My concern with the proposed increase in the renewable energy rate is predominantly to do with the inequity because of the different block sizes. The way the turbines are spread means that some turbines fall on smaller titles with a few turbines and others fall on large titles with a smaller number of turbines. Under the proposal the larger titles will be increasing a lot more than the smaller title regardless of the number of turbines on them. The only equitable way is to impose a rate on the turbines themselves and it must be imposed on a per megawatt basis, not per turbine.

I personally am not in favour of an increase at all and I think if this increase occurs the windfarms will just remove the extra cost from their community benefit funding which is quite generous.

The other problem is administrative in that the extra rates levied to the landholder and not the windfarm operators.

The landowner can claim that back from the windfarm operator but in the event of the operator going bad the landowner is left carrying the liability.

This proposed levy if it occurs should be directly between the windfarm operator and the shire.

If road damage is such a big concern to council is it not possible to get a bond prior to construction that is refundable upon completion once council is satisfied the roads impacted are reinstated to the same condition?

In relation to the mines in my neck of the woods namely Iluka and Tronox all movement of mined product is on the Brand Highway which is funded independently of the shire.

The campsites do have an increase in traffic at shift changes but it is only light vehicles that we all know do not cause any road damage.

Both camps take care of their own rubbish and sewerage so do not rely on the shire for anything except a little road maintenance.

Both Iluka and Tronox have generous community funds which would be compromised if they had to pay additional rates.

Submission	Officer Comment	Other Content
<p><b>My concern with the proposed increase in the renewable energy rate is predominantly to do with the inequity because of the different block sizes.</b></p> <p><b>The way the turbines are spread means that some turbines fall on smaller titles with a few turbines and others fall on large titles with a smaller number of turbines.</b></p> <p><b>Under the proposal the larger titles will be increasing a lot more than the smaller title regardless of the number of turbines on them.</b></p>	<p>This concern is acknowledged and warrants consideration in Council's decision-making process. Property size alone does not determine valuation or rate liability. According to the Valuer General, Land outside the metropolitan area or regional townsites (in general, rural land) is valued in its original natural state having regard for sales evidence as at the date of valuation. The unimproved value (UV) may consider degradation of the land and any services or amenities that may add value but assumes the property is in its original 'bush' state without improvements.</p> <p>A comparison of two properties (shown on right) within a Wind Farm area demonstrates that a larger property with more turbines may still attract a lower valuation.</p> <p>While the classification methodology may not perfectly capture every variation, it could be considered that the rates applied remain within reasonable bounds. If rate increases are contractually reimbursed by wind farm operators, the financial impact on landowners may be neutral.</p>	<p>Property 1 – 1415ha – Valuation \$2,989,000</p> <p>5 Towers</p> <p>– Proposed rates under renewable energy code = \$14,945</p> <p>– if only UV rates = \$11,059.30</p> <p>Property 2 – 1335ha – Valuation \$3,453,000</p> <p>4 towers</p> <p>– Proposed rates under renewable energy code \$17,265</p> <p>– If only UV rates - \$12,776.10</p>

<p><b>The only equitable way is to impose a rate on the turbines themselves and it must be imposed on a per megawatt basis, not per turbine .</b></p>	<p>Under the current legislative framework, local governments in Western Australia cannot impose rates on individual infrastructure components such as turbines or on output capacity (e.g., per megawatt). Rates must be levied on the landowner, based on land use and valuation. While alternative models may warrant consideration at a State policy level, they are not currently available to the Shire under the <i>Local Government Act 1995</i>..</p>	
<p><b>I personally am not in favour of an increase at all and I think if this increase occurs the windfarms will just remove the extra cost from their community benefit funding which is quite generous.</b></p>	<p>While the outcome described is speculative, the Shire notes that any reduction in voluntary contributions would not diminish the broader benefit of a more equitable and sustainable rating system. A differential rating approach provides the Shire with more predictable, transparent, and needs-based revenue. Should voluntary community contributions decrease, the Shire would have greater discretion to allocate funds in alignment with community priorities through its formal budget process.</p>	
<p><b>The other problem is administrative in that the extra rates levied to the landholder and not the windfarm operators.</b></p>	<p>This point is valid. The current legislative framework requires that rates be levied on the landowner, and reimbursement arrangements must be negotiated between the landowner and the project operator. The Shire understands that this may create additional administrative steps, and encourages landholders to establish clear lease agreements that address these matters. Nonetheless, the rating system must remain consistent with statutory provisions.</p>	

<p><b>The landowner can claim that back from the windfarm operator but in the event of the operator going bad the landowner is left carrying the liability.</b></p>	<p>The insolvency of a renewable energy project is a potential but unlikely risk given the extensive research and investment in proponent's financial decision making processes. Should a renewable energy project cease operation or its land use change materially, it would be appropriate for the Shire to review the rating category of the affected property. Any reassessment would follow due process and reflect the land's prevailing use at that time.</p>	
<p><b>This proposed levy if to occur should be directly between the windfarm operator and the shire.</b></p>	<p>Under current legislation, rates are applied to landowners, not lessees. While discussions about reform are occurring at the State level, no mechanism currently exists to enable local governments to rate project operators/owners directly. The Shire will continue to monitor policy developments and advocate for solutions that support fairness and accountability.</p>	
<p><b>If road damage is such a big concern to council is it not possible to get a bond prior to construction that is refundable upon completion once council is satisfied the roads impacted are reinstated to the same condition.?</b></p>	<p>Road bonds or similar mechanisms are appropriate during the construction phase of large projects and the Shire uses such tools during the development condition clearance process. Once a development is complete and conditions have been cleared the effectiveness of these mechanisms is diminished. In addition the rationale for the proposed differential rate extends beyond road maintenance. It also reflects broader impacts such as increased demand on strategic planning, regulatory compliance, community infrastructure, and administrative oversight.</p>	

<p><b>In relation to the mines in my neck of the woods namely Iluka and Tronox all movement of mined product is on the Brand Highway which is funded independently of the shire.</b></p>	<p>While Brand Highway is a State-controlled road, the Shire's infrastructure and services extend beyond transport networks. Contributions to community assets, administrative resources, and infrastructure renewal are all affected by industrial-scale operations within the Shire, including mines and renewable energy projects. The rating model reflects this broader service provision, not just road maintenance.</p>	
<p><b>The campsites do have an increase in traffic at shift changes but it is only light vehicles that we all know do not cause any road damage.</b></p>	<p>It is recognised that light vehicles have a lessor impact on road infrastructure compared to heavy vehicles. However, as with the above, road maintenance is only one aspect of the rating model. The Shire provides a wide range of services and infrastructure that support all sectors, including emergency services, compliance, waste management, and planning functions—each of which is impacted by a growing renewable energy sector.</p>	
<p><b>Both camps take care of their own rubbish and sewerage so do not rely on the shire for anything except a little road maintenance.</b></p>	<p>This is acknowledged; however, the Shire's rating model accounts for a broader set of service obligations than waste and road maintenance alone. Industrial and resource developments generate increased demand for strategic planning, environmental oversight, emergency management, and administrative coordination—costs borne by the Shire on behalf of the broader community.</p>	


**Both Iluka and Tronox have generous community funds which would be compromised if they had to pay additional rates.**

The contribution of these companies is acknowledged for their community funding initiatives. However, such funding is separate and voluntary, typically aligned with corporate social responsibility or social licence objectives. These contributions should be seen as complementary—not a substitute—for paying fair and reasonable rates. It is also noted that both companies currently pay lower rates than many townsite businesses and rural landholders. Across Western Australia, mining and industrial land uses are commonly subject to higher differential rates, and the Shire of Dandaragan is aligning its approach with broader industry standards – examples set out below.

Shire	2024/25 Rate in Dollar
Carnamah	0.32000
Gingin	0.006999
Irwin	0.21147
Toodyay	0.0120
Coorow	0.173785
<i>Dandaragan 2025/26 Proposed = 0.1000</i>	

## 2. Lawrie Short (Submission 1) Received on email 01/07/2025. Content and officer response below:


Differential Rates as applicable to Farming Properties receiving Lease Payments.

 Lawrie short [REDACTED]

↩ Reply

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Tue 1/07/2025 5:32 PM

① We removed extra line breaks from this message.

Caution! This message was sent from outside your organization.

ATTENTION PRESIDENT COUNCILLORS AND ADMINISTRATION.


Given action so far committed to, that this action goes forward (subject to final approval).

There are several points that. I draw your attention to:-

- Council has originally approved applications for construction of said Windfarms, only subject to approval of Construction Methodology and Safety Standards as applicable, with no impost of special rates on the properties where they are constructed (it should also be noted that the Emu Downs Windfarm was land owned by the Developer or a recognised Subsidiary);
- it should also be noted that in the one case (that the writer is aware of) where an additional rate was applied, on part of the Olive Farm on Kayanaba Road Dandaragan, was a seperate lot created for Rural Industrial, which attracted the Differential Rate;
- A point of clarification to the above is that an Industrial Olive Treatment ( Crushing Plant) is deemed to be non conformational under the Rural Planning Guidelines (or Policy);
- An additional point of note, in respect of the complexity of land tenure in the Shire's advancing of Technological Services ( seen to be a necessary improvement in advancing the Public Service within the Shire ) is the fact that when the first mobile tower site was applied for in Dandaragan, by Telstra, the Shire provided an amount of about Twenty Five Thousand Dollars (\$25,000) justifiably enhancing its commitment to being a Public Aware Shire in advancing the Public Good !
- Our concern is why has this very much approved basic good consideration of ensuring the Public Good ( by the Community) been cast aside?
- As the whole Community is aware of the Shire of Coolgardie's recent situation of the Minister for Local Government, criticising the Council for their proposed 97% rate increase and stating "... the rate system is not to be seen as a Cash Cow for rates ...?" I trust this is not the case here , without approved budgetary considerations

Sent from my iPhone)


ADDITIONAL COMMENTS FOR MY INCOMPLETE DIFFERENTIAL RATES EMAIL OF THE 1ST OF JULY 2025.

 Lawrie short [REDACTED]

↩ Reply

↩ Reply All

→ Forward



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Tue 1/07/2025 6:35 PM

Caution! This message was sent from outside your organization.

ATTENTION PRESIDENT, COUNCILLORS AND ADMINISTRATION.

Apologies for my fumbled fingered break in this communication.

....."

- In the case of the proposed Differential Rates, to be applied to those farmers receiving funds for the Leases, for Vestas as the Construction Contractors, in the name of the Primary Owner or Developer of the particular sites, it should be noted that they are not owners of the land only Leases! Thus the money paid to Landowners who then pay their own Tax on it, on condition the land is maintained for the purposes of Rural Farming Purposes, including areas with below the surface trenches, for power cabling and electronic control between towers under the Shires Planning Policy, meaning the Income for individual Farming Operatives ! This work is all done for the Public Good throughout the State, in accordance with the State Government's often stated Policy for Green More Cost Effective Power( believe it or not the inconvenience to our Farmers provides a Public Service to our Shire Residents even in non Rural Areas!);
- Should there be a necessity to continue this action in regard Differential Rates please make public the ruling by the Valuer General, who has successfully been able to reconsider the Values and therefore substantiate higher Rates on our Rural Properties, providing for the Public Good of the State, so that increased rates are applicable? Bear in mind the Shire's unqualified support by its approved payment to the first works FOR THE PUBLIC GOOD, being the Telstra Mobile Phone Tower !

Should I be able to further assist in this matter please contact me on Mob 0428 514 067.

Lawrie Short [REDACTED]  
1/07/2025

Sent from my iPhone

Submission	Officer Comment
<p><b>Council has originally approved applications for construction of said Windfarms, only subject to approval of Construction Methodology and Safety Standards as applicable, with no impost of special rates on the properties where they are constructed (it should also be noted that the Emu Downs Windfarm was land owned by the Developer or a recognised Subsidiary);</b></p>	<p>There is currently no established mechanism or legislative framework that enables the direct payment of rates between local governments and wind farm operators. Rates must be levied on the landowner in accordance with the <i>Local Government Act 1995</i>. Emerging State Government policy has yet to address this issue or propose any reforms that would provide local governments with alternative rating pathways for renewable energy infrastructure.</p>
<p><b>it should also be noted that in the one case (that the writer is aware of) where an additional rate was applied, on part of the Olive Farm on Kayanaba Road Dandaragan, was a seperate lot created for Rural Industrial, which attracted the Differential Rate;</b></p>	<p>Land use has been the primary determinant in the allocation of differential rating categories. To ensure consistency and transparency, a methodology based on Development Applications and planning records was applied across land parcels. All landowners are encouraged to contact the Shire should they believe their classification does not accurately reflect the current or predominant land use of their property.</p>
<p><b>A point of clarification to the above is that an Industrial Olive Treatment (Crushing Plant) is deemed to be non conformational under the Rural Planning Guidelines (or Policy);</b></p>	<p>The <i>Local Government Act 1995</i> provides Councils with the ability to apply differential rates based on zoning, land use, or other relevant characteristics. Provided that the process is conducted lawfully and transparently—including public consultation—Councils have discretion to classify land for rating purposes in a way that reflects its predominant use.</p>




<p><b>An additional point of note, in respect of the complexity of land tenure in the Shire's advancing of Technological Services ( seen to be a necessary improvement in advancing the Public Service within the Shire ) is the fact that when the first mobile tower site was applied for in Dandaragan, by Telstra, the Shire provided an amount of about Twenty Five Thousand Dollars (\$25,000) justifiably enhancing its commitment to being a Public Aware Shire in advancing the Public Good !</b></p>	<p>The Shire remains committed to a fiscally responsible and equitable rating strategy that supports essential public services and infrastructure, such as the contribution to the Telstra mobile tower. The proposed differential rating model seeks to ensure that all ratepayers contribute fairly in accordance with their land use and the associated demand placed on Shire resources, thereby enabling continued investment in community priorities.</p>
<p><b>Our concern is why has this very much approved basic good consideration of ensuring the Public Good ( by the Community) been cast aside?</b></p>	<p>As outlined above, the proposed rating strategy is designed to reflect land use and the equitable recovery of costs for services and infrastructure. This approach supports the broader ratepayer base and allows the Shire to continue delivering public benefit outcomes while maintaining long-term financial sustainability.</p>
<p><b>As the whole Community is aware of the Shire of Coolgardie's recent situation of the Minister for Local Government, criticising the Council for their proposed 97% rate increase and stating "... the rate system is not to be seen as a Cash Cow for rates ..?" I trust this is not the case here , without approved budgetary considerations</b></p>	<p>In 2024/25 the Shire of Coolgardie had already a separate and higher charging category for mining rates. Last financial year the Shire of Coolgardie imposed a mining differential rate of \$0.23667. The Minister's recent refusal was in response to the Council proposing to increase the rate in the dollar to \$0.50203.</p> <p>The Shire of Dandaragan's proposed differential rating model proposes a significantly less differential rate bringing the Shire in line with similar Shire's in the region. It seeks to ensure that properties with materially different land uses and associated impacts on the Shire's resources contribute proportionately. The Shire has followed a legislated and consultative process and believes the proposal is measured, responsible, and aligned with State policy direction on rating fairness.</p>

<p><b>In the case of the proposed Differential Rates, to be applied to those farmers receiving funds for the Leases, for Vestas as the Construction Contractors, in the name of the Primary Owner or Developer of the particular sites, it should be noted that they are not owners of the land only Leasees! Thus the money paid to Landowners who then pay their own Tax on it, on condition the land is maintained for the purposes of Rural Farming Purposes, including areas with below the surface trenches, for power cabling and electronic control between towers under the Shires Planning Policy, meaning the Income for individual Farming Operatives ! This work is all done for the Public Good throughout the State, in accordance with the State Government's often stated Policy for Green More Cost Effective Power( believe it or not the inconvenience to our Farmers provides a Public Service to our Shire Residents even in non Rural Areas!);</b></p>	<p>It is acknowledged that landowners leasing a portion of their land for renewable energy infrastructure may continue to use the balance for farming. However, the presence of commercial-scale renewable infrastructure represents a materially distinct and non-rural land use. Council's proposal to date considers the level of rates applied to UV Renewable Energy properties to be reasonable when viewed in relation to the land use intensity, operational scale, and broader impact on Shire services and infrastructure.</p> <p>The renewable energy sector contributes to the State's sustainability goals and provides long-term environmental and economic benefits however, it is also prudent for the Shire to recover the localised administrative and infrastructure costs associated with these developments. The Council's proposed rates have been developed to remain within a reasonable range and aim to maintain fairness across the full spectrum of ratepayers, acknowledging that other land uses also contribute to public benefit in different ways.</p>
<p><b>Should there be a necessity to continue this action in regard Differential Rates please make public the ruling by the Valuer General, who has successfully been able to reconsider the Values and therefore substantiate higher Rates on our Rural Properties, providing for the Public Good of the State, so that increased rates are applicable? Bear in mind the Shire's unqualified support by its approved payment to the first works FOR THE PUBLIC GOOD, being the Telstra Mobile Phone Tower !</b></p>	<p>All ratepayers have the right to request a review of their property valuation through the Office of the Valuer General. Valuations are carried out independently and are outside of the Shire's authority. If a landowner believes their valuation does not reflect the current market or land use conditions, they are encouraged to initiate a formal objection process. The Shire is available to support landowners in providing any relevant property information to assist with such reviews.</p>

3. Received on email 01/07/2025. Content and officer response below:

## Dandaragan Shire Council Differential Rate Rise Proposal 2025



 You forwarded this message on 2/07/2025 7:29 AM.

**Dandaragan Shire Council**

**Attention :-**

Brent Bailey  
Chief Executive Officer  
Shire of Dandaragan

Submission of disapproval;-  
Differential Rate Rise Proposal 2025

The proposal regarding a differential rate rise on selective properties to be addressed by the Dandaragan Shire Council I perceive to be a financial punishment to any progressive farmer in the district, be it hosting renewable energy projects, mining, oil or gas projects or intensive agricultural and agribusiness farming innovations and practices.

The reasons the Council has advocated for the proposal I believe should have been addressed, and was an obvious lack of foresight, when the Shire was first approached and welcomed companies with new initiatives and projects, and failure to do so is the responsibility of Council and not the farmer/host of any such projects.

I doubt that most Council representatives have any conception of the time; hours, days and years (in our case 13 years) spent in negotiating terms and agreements that satisfied both parties in the project on our property to proceed to the drawing up of a legal document.

We were first approached by a renewable energy feasibility company in 2007. At the time we saw this as an opportunity to realise a way of protecting our farming enterprise from future drought, local and global fluctuations of grain and meat production, fire (our property had 1/3 of the acreage burnt in 1978, the damage devastating) and unforeseen health issues.

We would be able to continue to live on our property, continue to offer employment and contribute to our community with no encumbrance to any public purse. For taking responsibility of our future we are to be punished?

At no time in the thirteen years of consultation did the Dandaragan Shire Council contact us with encouragement, advice or concerns. It seemed to be, as it should, our land our problem.

We have endured the disruption of consultation, construction and now maintenance as part of our daily farming practice. We are proud that the Locality of Dandaragan, whose property owners and residents are affected by the Yandin Wind Farm is compensated for the inconvenience with financial contributions to Clubs and Organisations in the locality and not metered out by a Shire public purse.

Council states increased costs in the provision of infrastructure, including road maintenance and the use of council buildings and an increase in administration costs due to renewable energy projects within the shire as the reason for the proposed differential rate increase.

For Council not recognising these issues would be ongoing for the life of a project and not entering an annually indexed agreement with the companies concerned for remuneration prior to any project progressing was an extraordinary oversight.

And now Council due to their gross negligence has proposed to pass responsibility for these stated increased costs to the landowner/project host/farmer/ratepayer.

It is assumed by Council that the differential rate rise applied to the land owner/hosts of a renewable energy project would be passed on to the company concerned for recompense. Thus making the land owner responsible for the Council's action.

I presume the proposal has been presented as the "easiest" method for Council to recoup costs associated with the renewable energy projects as the companies involved are not land owners and therefore cannot be rated for their activities.

For Council to consider such a proposal I can only presume they have had prior knowledge and information, concluding the differential rate increase would automatically be reimbursed to the land owner by the company involved in the contract on their property.

Every property land owner has a confidential agreement with the renewable energy company concerned. To my knowledge all agreements may differ hence the necessity for confidentiality.

Any Councillor or Dandaragan Shire employee has had knowledge of any said agreements and knowingly passed information to Council for the proposal to be put forward then Council may be held responsible for acting on information that is consequently a breach of a confidential contract. If subsequently a breach of contract was to be proved the property owners concerned would be within their rights to proceed to litigation.

I agree the Dandaragan Shire Council should be able to recoup costs regarding the argument for reimbursement put forward. And that an annual payment be agreed between Council and the renewable energy companies after presenting the additional costs to the Shire for provision of such services for that specific year.

For the Dandaragan Shire Council to consider a differential rate rise, at this stage, on a small number of property owners is incomprehensible and will divide a cohesive community.

Be it on the Council's head for the division between selected property owners and their neighbours due to inequities in their rates.

In closing I draw your attention to a 2016 draft paper by Dr Kristen Martinus;- Shire of Dandaragan Ward Boundary Review ; " Fair Community Representation".

A profound insight of the demographical complexities the communities of the Dandaragan Shire presented in 2016. A bias seemingly continues to exist within Council today.

I strongly disagree with the intended Council proposal.

June 2025

Please send a receipt of received email

Submission	Officer Comment
<p><b>The proposal regarding a differential rate rise on selective properties to be addressed by the Dandaragan Shire Council I perceive to be a financial punishment to any progressive farmer in the district, be it hosting renewable energy projects, mining, oil or gas projects or intensive agricultural and agribusiness farming innovations and practices. The reasons the Council has advocated for the proposal I believe should have been addressed, and was an obvious lack of foresight, when the Shire was first approached and welcomed companies with new initiatives and projects, and failure to do so is the responsibility of Council and not the farmer/host of any such projects.</b></p>	<p>There is currently no established mechanism or legislative framework that enables the Shire to directly rate renewable energy operators who are not the landowners. The Local Government Act 1995 requires that rates be levied on the landowner. While the Shire recognises the innovation and enterprise of landowners engaging with such industries, the proposed differential rating model is designed to ensure rate contributions align more closely with land use intensity and associated service impacts, rather than to penalise enterprise.</p>
<p><b>I doubt that most Council representatives have any conception of the time; hours, days and years ( in our case 13 years) spent in negotiating terms and agreements that satisfied both parties in the project on our property to proceed to the drawing up of a legal document. We were first approached by a renewable energy feasibility company in 2007. At the time we saw this as an opportunity to realise a way of protecting our farming enterprise from future drought, local and global fluctuations of grain and meat production, fire ( our property had 1/3 of the acreage burnt in 1978, the damage devastating) and unforeseen health issues.</b></p>	<p>The long-term commitment and effort involved in establishing renewable energy partnerships is acknowledged and respected. It also recognised that such arrangements are often critical to the sustainability of farming operations. The proposed rating strategy is not intended to diminish these efforts, but rather to maintain a sustainable revenue base for the Shire, enabling continued investment in services and infrastructure that benefit all residents and landowners.</p>

<p><b>We would be able to continue to live on our property, continue to offer employment and contribute to our community with no encumbrance to any public purse. For taking responsibility of our future we are to be punished? At no time in the thirteen years of consultation did the Dandaragan Shire Council contact us with encouragement, advice or concerns. It seemed to be, as it should, our land our problem.</b></p> <p><b>We have endured the disruption of consultation, construction and now maintenance as part of our daily farming practice. We are proud that the Locality of Dandaragan, whose property owners and residents are affected by the Yandin Wind Farm is compensated for the inconvenience with financial contributions to Clubs and Organisations in the locality and not metered out by a Shire public purse.</b></p>	<p>As noted above, the Shire's rating approach seeks to fairly apportion costs based on land use and property characteristics. It is acknowledged that renewable energy projects contribute to the local economy, including direct community contributions. However, these contributions are separate from the general revenue required to fund core Shire operations and infrastructure renewal. A fair rating model supports the Shire's capacity to deliver services for all ratepayers while recognising the diversity of land use across the district.</p>
<p><b>Council states increased costs in the provision of infrastructure, including road maintenance and the use of council buildings and an increase in administration costs due to renewable energy projects within the shire as the reason for the proposed differential rate increase. For Council not recognising these issues would be ongoing for the life of a project and not entering an annually indexed agreement with the companies concerned for remuneration prior to any project progressing was an extraordinary oversight.</b></p> <p><b>And now Council due to their gross negligence has proposed to pass responsibility for these stated increased costs to the landowner/project host/farmer/ratepayer.</b></p>	<p>There is currently no legislative mechanism that allows the Shire to directly negotiate or enforce rate-related payments from non-landholding renewable energy operators. While such an approach may have merit, it would require support from State Government policy and legislation. In the meantime, the Shire is acting within its lawful authority to propose a differential rating model that better reflects the actual use and service impact of properties.</p>

<p><b>It is assumed by Council that the differential rate rise applied to the land owner/hosts of a renewable energy project would be passed on to the company concerned for recompense. Thus making the land owner responsible for the Council's action.</b></p> <p><b>I presume the proposal has been presented as the “ easiest “ method for Council to recoup costs associated with the renewable energy projects as the companies involved are not land owners and therefore cannot be rated for their activities.</b></p>	<p>Contractual arrangements between landowners and renewable energy proponents are varied and confidential arrangements are acknowledged. The proposed differential rating category is based solely on land use, not on the financial arrangements between parties. The Shire has not received any confidential contract documentation, nor has it relied on such information in the development of its proposal. Landowners are encouraged to review their agreements and seek independent advice on the implications of any rate changes.</p>
<p><b>For Council to consider such a proposal I can only presume they have had prior knowledge and information, concluding the differential rate increase would automatically be reimbursed to the land owner by the company involved in the contract on their property.</b></p> <p><b>Every property land owner has a confidential agreement with the renewable energy company concerned. To my knowledge all agreements may differ hence the necessity for confidentiality.</b></p> <p><b>If any Councillor or Dandaragan Shire employee has had knowledge of any said agreements and knowingly passed information to Council for the proposal to be put forward then Council may be held responsible for acting on information that is consequentially a breach of a confidential contract. If subsequently a breach of contract was to be proved the property owners concerned would be within their rights to proceed to litigation.</b></p>	<p>Shire officers can confirm that the organisation has not received or relied upon any confidential lease or contract information in the formulation of the proposed differential rating model. The classification of properties has been based on observable land use, planning approvals, and information lawfully available to the Shire under standard administrative processes.</p>

<p><b>I agree the Dandaragan Shire Council should be able to recoup costs regarding the argument for reimbursement put forward. And that an annual payment be agreed between Council and the renewable energy companies after presenting the additional costs to the Shire for provision of such services for that specific year.</b></p>	<p>As outlined above, while such an approach may be desirable in the future, current legislation does not provide a mechanism for local governments to impose rates or service levies directly on entities that are not the landowners. The Shire has advocated for broader reforms in this area and will continue to monitor and contribute to State-level discussions on appropriate models for cost recovery from commercial renewable energy operators.</p>
<p><b>For the Dandaragan Shire Council to consider a differential rate rise, at this stage, on a small number of property owners is incomprehensible and will divide a cohesive community.</b>  <b>Be it on the Council's head for the division between selected property owners and their neighbours due to inequities in their rates.</b>  <b>In closing I draw your attention to a 2016 draft paper by Dr Kristen Martinus;- Shire of Dandaragan Ward Boundary Review ; “ Fair Community Representation”.</b>  <b>A profound insight of the demographical complexities the communities of the Dandaragan Shire presented in 2016. A bias seemingly continues to exist within Council today.</b>  <b>I strongly disagree with the intended Council proposal.</b></p>	<p>The respondent's concern is acknowledged however the intent of the differential rating model is not to create division but to address an identified imbalance in the existing system. The rating proposal is part of a broader review to ensure that properties contribute to the Shire's revenue in a way that reflects their land use and associated service needs. Community feedback is an essential part of this process, and all submissions are being carefully considered before any final decision is made.</p>

4. Lawrie Short (Submission 2) Received on email 02/07/2025. Content and officer response below:

Differential Rates .

LS

Lawrie Short [REDACTED]

↩ Reply

↩ Reply All

→ Forward

Wed 2/07/2025 11:46 AM

We removed extra line breaks from this message.

Caution! This message was sent from outside your organization.

ATTENTION COUNCILLORS AND ADMINISTRATION.

I has been very difficult for me to accept your chosen methodology in determining this particular matter in regard the following basis :-

- The Farmers do not own the Wind Generating Infrastructure , the Operators(Developers who received Shire Approval), thus their responsibility's for all Rates is Possible ( with a Rezoning of subject lands to " Temporary Rural Industrial, subject to returning Zoning to Rural, at completion of life of Wind-Farm") in accordance with Shire established Policy as witnessed by the Olive Farm Rural Industrial site in Kayanaba Road ;
- Should this issue have arisen, in regard the approval of said structures, when the proposals were first brought forward, the conditions should have been :- •Developers ( or subsidiary's)to Purchase farms( per Emu Downs approval, on condition they returned farm to original owners ( heirs and successors) at completion of life of Wind-farms say 10-20 years, with removal of Wind -Farm infrastructure removed at Operators Cost , bearing in mind original farmers retain conditional lease rights over lands during life of Wind-Farms , (as is Policy under the issue of Mining Leases )Thus the Wind Farm Operators could be the Primary Ratepayers and eligible to pay rates on the Lease Moneys they earn !

As cumbersome as this process is it is in my opinion the only Legal Outcome that is possible . You may like to consult your Legal Advisers on this process as the option you prefer, which in my Land Tenure Opinion is somewhat insecure in terms of rights of application of Differential Rates, as I am not sure Local Government Policy is totally aware of the Land Tenure Applications ).

Thanking you for your attention,

Lawrie Short [REDACTED]



Submission	Officer Comment
<p><b>The Farmers do not own the Wind Generating Infrastructure , the Operators(Developers who received Shire Approval), thus their responsibility's for all Rates is Possible ( with a Rezoning of subject lands to “ Temporary Rural Industrial, subject to returning Zoning to Rural, at completion of life of Wind-Farm”) in accordance with Shire established Policy as witnessed by the Olive Farm Rural Industrial site in Kayanaba Road</b></p>	<p>It is standard practice under the <i>Local Government Act 1995</i> for local government rates to be levied on the landowner, regardless of any lease arrangements in place with third parties. This is consistent across a range of property types including commercial, industrial, and rural properties. The generation of income through leasing does not transfer rating liability from the landowner to the lessee. In the case of renewable energy infrastructure, it remains the landowner’s responsibility to pay rates unless otherwise legislated.</p>
<p><b>Should this issue have arisen, in regard the approval of said structures, when the proposals were first brought forward, the conditions should have been :- •Developers ( or subsidiary's)to Purchase farms( per Emu Downs approval, on condition they returned farm to original owners ( heirs and successors) at completion of life of Wind-farms say 10-20 years, with removal of Wind -Farm infrastructure removed at Operators Cost , bearing in mind original farmers retain conditional lease rights over lands during life of Wind-Farms , (as is Policy under the issue of Mining Leases )Thus the Wind Farm Operators could be the Primary Ratepayers and eligible to pay rates on the Lease Moneys they earn !</b></p>	<p>The Shire is not a party to private land tenure or commercial arrangements between renewable energy developers and property owners. It also does not have the authority under the <i>Planning and Development Act 2005</i> to compel developers to purchase land or impose reversionary ownership conditions. It is now industry standard for wind farm infrastructure to be installed under lease agreements, allowing renewable energy generation to coexist with ongoing agricultural activities. This model supports dual land use and is supported by State planning policy.</p>
<p><b>As cumbersome as this process is it is in my opinion the only Legal Outcome that is possible . You may like to consult your Legal Advisers on this process as the option you prefer, which in my Land Tenure Opinion is somewhat insecure in terms of rights of application of Differential Rates, as I am not sure Local Government Policy is totally aware of the Land Tenure Applications ).</b></p>	<p>Local governments have a legal authority to implement a differential rating structure, as provided under the <i>Local Government Act 1995</i>. This legislation enables local governments to apply differential rates based on land use, zoning, or other relevant factors, provided the statutory process is followed. The Shire has undertaken this process transparently, including public consultation, and is satisfied that its proposed model is lawful, reasonable, and equitable. The classification of land for rating purposes is based on use and not on tenure ownership models or private leasing arrangements.</p>

5. Received email on 02/07/2025. Content and officer response below:

Proposed Rate Changes

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [...](#)

Wed 2/07/2025 9:53 AM

Caution! This message was sent from outside your organization.

Brent Bailey CEO

Brent,

A short notice meeting attended by fifteen (15) concerned landowner/ratepayers was held at Dandaragan on 29th June 2025 to discuss the proposed rate changes relating to change of land use. ie wind farms, mining etc.

The meeting acknowledged that there is an opportunity for rural communities to gain financial support from these projects as a level of compensation for the impact they will have on their communities.

The meeting was unanimous in the view that as it is proponents of these projects who will profit most from these opportunities then clearly they should be making these financial commitments and not left to the landowner/ratepayers which can be a much more complicated process.

As the broader community is to be the beneficiary of these new funds raised it is surely neither fair or equitable for individual ratepayers to carry this burden. Dandaragan Shire is very much a leading area of wind renewable energy projects and surely this must give your Shire a great opportunity to establish guidelines to protect the interests of our rural communities.

We look forward to a satisfactory outcome to this matter.

On behalf of this meeting

[Redacted Signature]

Submission	Officer Comment
<p><b>A short notice meeting attended by fifteen (15) concerned landowner/ratepayers was held at Dandaragan on 29th June 2025 to discuss the proposed rate changes relating to change of land use. ie wind farms, mining etc.</b></p> <p><b>The meeting acknowledged that there is an opportunity for rural communities to gain financial support from these projects as a level of compensation for the impact they will have on their communities.</b></p>	<p>The community's proactive engagement on this matter is acknowledged and welcomed. However, it is important to note that the Shire does not have jurisdiction over private commercial arrangements between landowners and renewable energy proponents. There is currently no legislative mechanism that enables the Shire to levy rates directly on renewable energy operators unless they are the registered landowner. Emerging State policy has also not yet addressed this gap in a way that supports direct rating or compensation frameworks between local governments and renewable energy developers.</p>
<p><b>The meeting was unanimous in the view that as it is proponents of these projects who will profit most from these opportunities then clearly they should be making these financial commitments and not left to the landowner/ratepayers which can be a much more complicated process.</b></p>	<p>As outlined above, the Shire is unable to impose rates directly on wind farm or mining operators unless they own the land. Under the <i>Local Government Act 1995</i>, rates are assessed and collected from the registered landowner. The principle that those who benefit financially from major developments should contribute to the cost of infrastructure and services is supported, however current legislation does not permit this to occur outside of agreements between private parties.</p>
<p><b>As the broader community is to be the beneficiary of these new funds raised it is surely neither fair or equitable for individual ratepayers to carry this burden.</b></p> <p><b>Dandaragan Shire is very much a leading area of wind renewable energy projects and surely this must give your Shire a great opportunity to establish guidelines to protect the interests of our rural communities.</b></p>	<p>The proposed differential rating strategy is seen as fiscally responsible and an equitable rating strategy that align with land use and property characteristics. While private benefit is acknowledged, the Shire's proposed differential rating structure is designed to address the imbalance created under the general rate model, where certain land uses do not proportionately contribute to the services and infrastructure they impact. The Shire continues to advocate through appropriate channels for policy reform that better reflects the realities of shared-use land and ensures rural communities are not unfairly burdened.</p>

6. Phillip Panizza - Received on email 03/07/2025. Content and officer response below:

Phillip Panizza

2nd July 2025

Mr Brent Bailey  
Chief Executive Officer, Shire of Dandaragan  
PO Box 676  
Jurien Bay WA 6516

Re: Submissions from a Ratepayer with respect to the proposed differential rates for properties described as UV Renewable Energy

Dear Brent and Shire Councillors

I am the owner of the farm property address 2007 Yerramullah Road Hill River in the Shire of Dandaragan. The farm leases land to host wind energy generation. My brother Aubrey Panizza made me aware of the Shire's proposed differential rating changes; I had not received any notice from the Shire. I phoned the Shire on the 26<sup>th</sup> of June and was then provided with the notice mailed to other UV Renewable Energy identified landowners.

Your differential rating proposal is grossly unfair and inequitable.

The Shire gave approval to each renewable energy project in the shire of Dandaragan. Each project was approved without any specific Shire imposed encumbrances for farming property owners. The Shire published that it had given approval because the projects would be beneficial for the shire, that it showed the Shire was actively supporting renewable energy generation and extending its industry base and employment opportunity.

So now the Shire proposes differential rating for farms hosting renewable energy production because it wants to make some cash from the renewables energy industry!

The proposed differential rating of properties hosting renewable energy is an afterthought.

The Shire claims "higher costs to Council as a result of these (renewable energy projects) activities". This claim has not been established by Council and should not be accepted as fact on face value.

The suggestion that Shire costs are materially increased by the ongoing gravel road usage by renewable energy projects is unsupported by data. The few vehicles travelling between Jurien Bay and the Badgingarra Wind Farm each day drive on approximately 7km of Cadda Rd. The number of windfarm vehicles would be indistinguishable among the total numbers of vehicles travelling daily on Cadda Road.

Why the UV Renewable Energy differential rating proposal is unfair and inequitable:

Each farm will be inequitably rated.

It is proposed that all properties described as UV Renewable Energy are to be equally charged at a flat rate per hectare. Each property hosts different numbers of wind turbines – the number of wind turbines determine the lease rent received by the lease owner; some farms have few and some have many wind turbines, some farms are small and some are large. The result is no link between renewables lease benefit and rates charged – disproportionate and inequitable rating. The proposal by the Shire is an arbitrary cash grab.

UV Agriculture rated farmers are not rated on how they produce their income or how much income they may produce.

The Council is proposing to rate farms on their source of income. Farmers leasing a fraction of their farming land for renewables generation are to have an

additional rates burden because they receive some income from renewable power generation. The Shire is inconsistent; it does not tax other alternate forms of on-farm income generation; income that is not the largest or sole source of income generated of the farming property. The proposal is a punitive tax.

That's the only difference!

A neighbour was offered a lease for renewable power generation, he decided it was too much bother and may adversely impact his farm income so refused to lease any land for renewable energy generation. His choice, now he won't be penalised by higher rates. Where is the consistency?

Divide and conquer is a strategy.

The Council's proposal if put to an "uninformed" public would seem reasonable and be supported. This does not make the proposal reasonable nor justifiable. If the proposal were to be put to other farmers I'd expect a mixed result; some would be indifferent, some may say, "well the UV Renewable Energy described farms benefit them so they can pay the extra rates, other farmers would reject out-of-hand the action of Council as a money grab – and fear that this proposal may be the thin-end-of-the-wedge and trigger the Shire to exercise other income generating opportunities. (For example, "tolling" the movement of materials off farms.)

I am not the financial beneficiary of the property's renewables lease.

I reached retirement age in 2021, so sold the benefits of my renewables lease in 2022 to fund my retirement. I don't have windfarm income, I still have farming income, so it is proposed I pay higher shire rates than my farmer neighbours.

Rating farmers for leasing land to Renewable Energy project owners?

The Shire claims higher costs resulting from renewable energy projects: Then rate/tax the renewable energy project owners, not the contractors (farm owners who lease some land to host Shire supported renewable energy projects).

The proposed new differential rate on UV Renewable Energy farms is an ambit claim.

The Shire proposal is to rate property owners who don't have any control of or responsibility for any claimed "higher costs to Council as a result of these (renewable energy projects) activities"

The proposed UV Renewable Energy rates will increase my annual rates by approximately 18%, the windfarm only leases approximately 13% of my property.

So social responsibility comes with a singular financial cost burden.

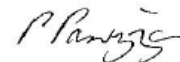
For hosting renewable energy production on my farm benefits all our efforts to achieve "Net-Zero" and a better world ecology. However, apparently only some farmers share the burden of cost! Where is the equitable burden of cost to all in the Shire of Dandaragan?

Tell me how the Council proposed new differential rate on renewables are not an ambit claim.

WALGA has noted that it supports shires receiving a beneficial contribution from renewable energy projects within their jurisdictions.

If the Shire wants a beneficial contribution from renewable energy projects, it should contact the project owners and negotiate with them in good faith for mutual benefit.

Yours Sincerely,



Phillip Panizza

Submission	Officer Comment
<p><b>The Shire gave approval to each renewable energy project in the shire of Dandaragan. Each project was approved without any specific Shire imposed encumbrances for farming property owners. The Shire published that it had given approval because the projects would be beneficial for the shire, that it showed the Shire was actively supporting renewable energy generation and extending its industry base and employment opportunity.</b></p> <p><b>So now the Shire proposes differential rating for farms hosting renewable energy production because it wants to make some cash from the renewables energy industry!</b></p> <p><b>The proposed differential rating of properties hosting renewable energy is an afterthought.</b></p>	<p>It is acknowledged that previous project approvals were granted in support of broader objectives such as economic diversification, environmental sustainability, and employment opportunities. The proposed differential rating is not retrospective but reflects the current and ongoing change in land use associated with the hosting of renewable energy infrastructure. It aims to align rate contributions more fairly with the services and administrative oversight required to support this evolving sector, in accordance with the <i>Local Government Act 1995</i>.</p>
<p><b>The Shire claims “higher costs to Council as a result of these (renewable energy projects) activities”. This claim has not been established by Council and should not be accepted as fact on face value.</b></p> <p><b>The suggestion that Shire costs are materially increased by the ongoing gravel road usage by renewable energy projects is unsupported by data. The few vehicles travelling between Jurien Bay and the Badgingarra Wind Farm each day drive on approximately 7km of Cadda Rd. The number of windfarm vehicles would be indistinguishable among the total numbers of vehicles travelling daily on Cadda Road.</b></p>	<p>The landowners concerns regarding the quantification of infrastructure impact are noted. While traffic data on individual roads may show variance post wind farm construction, the broader cumulative costs associated with compliance monitoring, planning, strategic coordination, and administrative overheads are significant. These are not isolated to road usage but span a range of Shire services that are increasingly impacted by utility-scale developments. An example of increased infrastructure use is Yandin Road. Prior to the completion of the Yandin wind farm this road was graded once per year. In 2025/26 the road was graded 3 times by contractors and road attended twice more by the Shire’s maintenance team.</p>

<p><b>Why the UV Renewable Energy differential rating proposal is unfair and inequitable:</b>  <b>Each farm will be inequitably rated. It is proposed that all properties described as UV Renewable Energy are to be equally charged at a flat rate per hectare. Each property hosts different numbers of wind turbines – the number of wind turbines determine the lease rent received by the lease owner: some farms have few and some have many wind turbines, some farms are small and some are large. The result is no link between renewables lease benefit and rates charged – disproportionate and inequitable rating. The proposal by the Shire is an arbitrary cash grab.</b></p>	<p>The proposed rating category is based on land use classification rather than infrastructure density or income generation. This is consistent with other differential rating categories, such as UV Intensive Agriculture, where properties are rated based on predominant land use, not individual productivity or income. The presence of renewable energy infrastructure constitutes a material change in land use, justifying its classification under a distinct rating category.</p>
<p><b>UV Agriculture rated farmers are not rated on how they produce their income or how much income they may produce.</b>  <b>The Council is proposing to rate farms on their source of income. Farmers leasing a fraction of their farming land for renewables generation are to have an additional rates burden because they receive some income from renewable power generation. The Shire is inconsistent; it does not tax other alternate forms of on-farm income generation; income that is not the largest or sole source of income generated of the farming property. The proposal is a punitive tax. That's the only difference! A neighbour was offered a lease for renewable power generation, he decided it was too much bother and may adversely impact his farm income so refused to lease any land for renewable energy generation. His choice, now he won't be penalised by higher rates. Where is the consistency?</b></p>	<p>The proposal does not target income sources but recognises that the hosting of utility-scale infrastructure creates a distinct land use impact. Unlike smaller-scale or incidental income-generating activities, renewable energy infrastructure represents a long-term, higher-impact development that requires increased oversight and service provision. The Shire's proposal is consistent with guidance from WALGA and similar local governments that support separate rating categories for such land uses.</p>

<p><b>Divide and conquer is a strategy. The Council's proposal if put to an "uninformed" public would seem reasonable and be supported. This does not make the proposal reasonable nor justifiable. If the proposal were to be put to other farmers I'd expect a mixed result; some would be indifferent, some may say, "well the UV Renewable Energy described farms benefit them so they can pay the extra rates, other farmers would reject out-of-hand the action of Council as a money grab – and fear that this proposal may be the thin-end-of-the-wedge and trigger the Shire to exercise other income generating opportunities. (For example, "tolling" the movement of materials off farms.)</b></p>	<p>The landowners concerns about community perception and cohesion are noted. However, differential rating is a long-standing, lawful tool used by local governments to equitably distribute rates based on land use impact. It is not intended as a punitive measure but as a way to ensure that all properties contribute proportionately to the Shire's operational and infrastructure costs.</p>
<p><b>I am not the financial beneficiary of the property's renewables lease. I reached retirement age in 2021, so sold the benefits of my renewables lease in 2022 to fund my retirement. I don't have windfarm income, I still have farming income, so it is proposed I pay higher shire rates than my farmer neighbours.</b></p>	<p>The rating classification is applied based on current land use, not individual financial arrangements or lease income. Where renewable energy infrastructure is present and contributes to the land use, the property is considered to meet the criteria for the UV Renewable Energy category. This ensures fairness and consistency across all landowners irrespective of contractual terms.</p>
<p><b>Rating farmers for leasing land to Renewable Energy project owners? The Shire claims higher costs resulting from renewable energy projects: Then rate/tax the renewable energy project owners, not the contractors (farm owners who lease some land to host Shire supported renewable energy projects).</b>  <b>The proposed new differential rate on UV Renewable Energy farms is an ambit claim. The Shire proposal is to rate property owners who don't have any control of or responsibility for any claimed "higher costs to Council as a result of these (renewable energy projects) activities"</b></p>	<p>The landowner's concern is acknowledged; however, under the <i>Local Government Act 1995</i>, local governments must levy rates on the landowner, not the lessee. While the Shire supports further exploration of host contribution mechanisms at a State level, the proposed differential rating structure remains the most practical and lawful tool currently available to ensure appropriate cost recovery.</p>

<p><b>The proposed UV Renewable Energy rates will increase my annual rates by approximately 18%, the windfarm only leases approximately 13% of my property.</b></p> <p><b>So social responsibility comes with a singular financial cost burden. For hosting renewable energy production on my farm benefits all our efforts to achieve “Net-Zero” and a better world ecology. However, apparently only some farmers share the burden of cost! Where is the equitable burden of cost to all in the Shire of Dandaragan?</b></p>	<p>The proposed classification applies to properties where renewable energy infrastructure constitutes a component of land use. It is not applied on a pro-rata basis by leased area, as such an approach would be administratively complex and inconsistent with how other rating categories are managed. The focus is on land use, not lease area or financial arrangements.</p>
<p><b>Tell me how the Council proposed new differential rate on renewables are not an ambit claim.</b></p> <p><b>WALGA has noted that it supports shires receiving a beneficial contribution from renewable energy projects within their jurisdictions.</b></p> <p><b>If the Shire wants a beneficial contribution from renewable energy projects, it should contact the project owners and negotiate with them in good faith for mutual benefit.</b></p>	<p>The underlying principle is that renewable energy operators should contribute to local government services and infrastructure. While statutory rating currently only allows landowners to be charged, the Shire is open to negotiating voluntary agreements or contributions from operators. The proposed differential rating structure is an interim, lawful solution to address immediate funding imbalances while broader industry and legislative developments continue.</p>



7. Received via post 03/07/2025. Content and officer response below:

30 June 2025

Brent Bailey  
Chief Executive Officer  
Shire of Dandaragan  
PO Box 676  
JURIEN BAU WA 6516

Dear Brent

#### Proposed Rate Change

There is absolutely no reason to change the system of rates in this shire – and the proposed change would seem to be merely a money grab. Rather like someone smashing a window and grabbing what they can before high tailing it. There is no logic behind the arguments and I don't find the attempt at brainwashing language to be at all persuasive, only offensive.

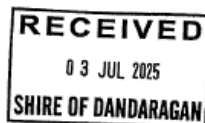
No, it is NOT fair to change the system of rates.

Of course, I am only assuming that the letter we received was meant for us. It was headed Dear Ms Shiralee and not Mr Taylor or even Ms Carroll. However, assuming it hit the right post office box, it informed us that this farm is now going to be rated as **UV Renewable Energy**. Presumably this is because of the proposed wind farm which has been going to be built for about ten years but is not actually under construction yet. When we signed up, we thought it might pay our sons' senior schooling, which hadn't started at that stage. They're out of school now and we struggled through.

The wind farm people told us last year construction was going to start. They say they hope to start this year. I'll believe it when I see it, and I don't see why we should be rated for something that hasn't even been constructed.

Neither do I see that **three wind towers** (it was six originally but is now three) and a bit of a gravel track between them on the back of this farm, means we should pay more rates. It's what, about 98% of the land? This is a farm, first and foremost, and it will continue to be farmed. How dare you levy a wind farm rate on the whole place? And you're trying to argue that's fair?

We should, in fact, have a reduction in rates for the farmland we cannot use or earn an income from because the State Government has stolen it and forced us to maintain it as quasi state park. Better yet – they should pay the rates on those hectares. Why don't you get onto that? Champion your rate payers for a change?



The notes provided with your letter say this proposed change reflects an increase in shire infrastructure usage. I can't see how. We are situated on the Brand Highway, which is not maintained by the shire. **Three wind turbines spinning around wouldn't seem to use your infrastructure at all, let alone more.**

In point of fact, my husband and I have been wondering for some time what the shire actually does for us because it doesn't seem to be anywhere near what some other rate payers receive. I have to allow some road maintenance of roads such as Cataby and Dandaragan but, as pointed out, we're on the highway and most of our driving seems to be on the highway.

You have a fire officer, but then my husband's a volunteer fireman so that seems to be quid pro quo. We have to pay a state levy for pest management. We pay to use the rubbish tip, and we have to take our rubbish there ourselves – no road side collection for us. No roadside recycling collection either, but I suppose you do provide a depot at the school. Again, I have to drive it there (and McNamara Road is a horrible road) and more than once I've found all the recycling bins full, so it seems to me there may not be enough pickups.

You maintain the Badgi Hall, I guess, but I rarely go there anymore. The last time I did I noticed that our beautiful car park near the public toilets had been turned into a horrible, ugly concrete jungle that wouldn't look out of place in down town Perth. I wonder how much it cost to eradicate the natural look and uglify it?

Frankly, we really struggle to see what value the Shire puts into our lives these days.

When we first moved onto the farm, we rang the Shire and got the septic tank emptied, paying for the service. We had a problem with our septic tank last year or the year before and I rang the Shire again – I was shocked to be told that this essential service was no longer provided, and instead I should ring Greenhead or Moora. Where was the referendum on that? How do you just stop providing an essential service? What are you for, if don't provide those?

Not that this Shire has a good track record of obeying its rate payers. If it did, the shire office would still be in Dandaragan and the ivory tower would not be in Jurien Bay. The vote of the people was simply ignored. We'd still have wards as well – not that we were asked about that one. When people complained, the shire used our money to get a nonsense study done that agreed with what they wanted. He who pays for the study usually gets the result they want, but not when its collective money and some government official directs the answer.

The Shire needs to be accountable to the rate payers – that's democracy. Yet I suspect that our council is being taken over by those with a political agenda. A shire should be managed by concerned citizens and the people in the office should also be citizens. That seems to be not the case in our shire at the moment, and that should concern everyone.

You don't have my permission to change the rate system, and you should be made to seek it in a referendum.

Yours sincerely



Submission	Officer Comment
<p><b>There is absolutely no reason to change the system of rates in this shire - and the proposed change would seem to be merely a money grab. Rather like someone smashing a window and grabbing what they can before high tailing it. There is no logic behind the arguments and I don't find the attempt at brainwashing language to be at all persuasive, only offensive.</b></p> <p><b>No, it is NOT fair to change the system of rates.</b></p>	<p>The landowners concerns raised in the submission are acknowledged and the opportunity to clarify its intent are welcomed. The proposed changes to the rating structure are part of a fiscally responsible and equitable approach to ensure that all ratepayers contribute fairly based on land use and property characteristics. The review of the differential rating model is aimed at improving transparency and aligning rates with the actual impact of land use on Shire services and infrastructure. It is not intended as a revenue-raising exercise, but rather as a means to ensure long-term financial sustainability and fairness across the community.</p>
<p><b>Of course, I am only assuming that the letter we received was meant for us. It was headed Dear Ms Shiralee and not Mr Taylor or even Ms Carrol. However, assuming it hit the right post office box, it informed us that this farm is now going to be rated as UV Renewable Energy. Presumably this is because of the proposed wind farm which has been going to be built for about ten years but is not actually under construction yet. When we signed up, we thought it might pay our sons' senior schooling, which hadn't started at that stage. They're out of school now and we struggled through.</b></p>	<p>The Shire's administration regrets any confusion caused by the incorrect salutation in the correspondence and appreciates the feedback regarding communication. The Company Address associated with the property had "C/- Taylor Shiralee" listed within the Shire's address database which was confused with property owner details. With respect to the proposed category, land use has been the primary factor in determining differential rates. The allocation was based on the assessment of Development Applications received by the Shire and the anticipated land use impacts of those proposals. Landowners are encouraged to contact the Shire to discuss their rating classification if they believe it does not accurately reflect the current land use</p>
<p><b>The wind farm people told us last year construction was going to start. They say they hope to start this year. I'll believe it when I see it, and I don't see why we should be rated for something that hasn't even been constructed. Neither do I see that three wind towers (it was six originally but is now three) and a bit of a gravel track between them on the back of this farm, means we should pay more rates. It's what, about 98% of the land? This is a farm, first and foremost, and it will continue to be farmed. How dare you levy a wind farm rate on the whole place? And you're trying to argue that's fair?</b></p>	<p>The landowner's concern regarding the timing of construction for renewable energy infrastructure are acknowledged. However, differential rating for the renewable energy category would be implemented on project completion and projects with an active development approval were included in Council's consultation program. The Shire encourages any landowner who believes their property's classification does not accurately reflect its rating category to contact the Shire for further discussion and clarification.</p>

<p><b>We should, in fact, have a reduction in rates for the farmland we cannot use or earn an income from because the State Government has stolen it and forced us to maintain it as quasi state park. Better yet -they should pay the rates on those hectares. Why don't you get onto that? Champion your rate payers for a change?</b></p>	<p>The impact of State Government land management decisions on landowners is acknowledged. However, matters relating to land tenure or compulsory acquisition are beyond the scope of this differential rating review. Landowners are encourage dto engage with relevant State agencies to seek further resolution. Nonetheless, the Shire is committed to advocating for fair outcomes for its residents where appropriate.</p>
<p><b>The notes provided with your letter say this proposed change reflects an increase in shire infrastructure usage. I can't see how. We are situated on the Brand Highway, which is not maintained by the shire. Three wind turbines spinning around wouldn't seem to use your infrastructure at all, let alone more.</b></p>	<p>Road maintenance is only one aspect of the funding purpose. Broader contributions to community assets, renewal of infrastructure, contributions to administrative overheads of the Shire business for example are all increasing and impacted by a growing renewable energy sector.</p>
<p><b>In point of fact, my husband and I have been wondering for some time what the shire actually does for us because it doesn't seem to be anywhere near what some other rate payers receive. I have to allow some road maintenance of roads such as Cataby and Dandaragan but, as pointed out, we're on the highway and most of our driving seems to be on the highway.</b></p>	<p>While the Brand Highway is maintained by Main Roads WA, local infrastructure demands extend beyond direct road access and frontage. The broader presence of renewable energy operations increases pressure on local infrastructure, administrative oversight, planning functions, and community services. The proposed rating approach ensures that developments with a greater economic scale and administrative impact contribute proportionately to the cost of maintaining these services across the district.</p>
<p><b>You have a fire officer, but then my husband's a volunteer fireman so that seems to be quid pro quo. We have to pay a state levy for pest management. We pay to use the rubbish tip, and we have to take our rubbish there ourselves no road side collection for us. No roadside recycling collection either, but I suppose you do provide a depot at the school. Again, I have to drive it there (and McNamara Road is a horrible road) and more than once I've found all the recycling bins full, so it seems to me there may not be enough pickups.</b></p>	<p>Officers understand that service visibility and utilisation vary among ratepayers. While road maintenance is a key function, the Shire also provides a broad range of services including emergency management, community infrastructure, regulatory functions, planning services, and public amenities. The differential rating model is designed to ensure all properties contribute fairly based on their land use and the relative demands they place on these services.</p>

<p><b>You maintain the Badgi Hall, I guess, but I rarely go there anymore. The last time I did I noticed that our beautiful car park near the public toilets had been turned into a horrible, ugly concrete jungle that wouldn't look out of place in down town Perth. I wonder how much it cost to eradicate the natural look and uglify it?</b></p> <p><b>Frankly, we really struggle to see what value the Shire puts into our lives these days.</b></p>	<p>Aesthetic preferences vary and it is understood that some changes may not be universally welcomed. Investment in community infrastructure is guided by safety, accessibility, long-term usability, and cost-efficiency considerations. While not every project benefits every resident directly, infrastructure improvements are made in the interest of the community as a whole.</p>
<p><b>When we first moved onto the farm, we rang the Shire and got the septic tank emptied, paying for the service. We had a problem with our septic tank last year or the year before and I rang the Shire again -I was shocked to be told that this essential service was no longer provided, and instead I should ring Greenhead or Moora. Where was the referendum on that? How do you just stop providing an essential service? What are you for, if don't provide those?</b></p>	<p>Concerns about changes to service provision are acknowledged. However, the delivery of some specific services may be discontinued due to regulatory, financial, or logistical reasons. Wastewater and septic services are now primarily delivered by private operators under relevant health and environmental regulations. As with other operational matters, this change does not fall under the differential rating proposal, but residents are welcome to raise such concerns directly with Shire officers for further explanation.</p>
<p><b>Not that this Shire has a good track record of obeying its rate payers. If it did, the shire office would still be in Dandaragan and the ivory tower would not be in Jurien Bay. The vote of the people was simply ignored. We'd still have wards as well-not that we were asked about that one. When people complained, the shire used our money to get a nonsense study done that agreed with what they wanted. He who pays for the study usually gets the result they want, but not when its collective money and some government official directs the answer.</b></p>	<p>Officers acknowledge that some past decisions of Council continue to be a source of community concern. Local government decisions are made by the elected Council, following the appropriate legislative processes, and in the broader interest of the district. Although not all individual preferences can be met, community engagement is a critical part of informing Council decision-making. Continued participation through formal feedback channels, consultation processes, and attendance at Council meetings are encouraged.</p>

<p><b>The Shire needs to be accountable to the rate payers - that's democracy. Yet I suspect that our council is being taken over by those with a political agenda. A shire should be managed by concerned citizens and the people in the office should also be citizens. That seems to be not the case in our shire at the moment, and that should concern everyone. You don't have my permission to change the rate system, and you should be made to seek it in a referendum.</b></p>	<p>Officers remain confident in the legal authority to implement a differential rating strategy, as provided under the <i>Local Government Act 1995</i>. This legislation enables local governments to set different rates in the dollar for various land use categories, provided the process is transparent, advertised, and adopted in accordance with statutory requirements. Elected members—who are local residents and representatives of the community—are entrusted to make decisions in the public interest, including the adoption of rating models that support equity and long-term sustainability.</p>
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## 8. Received via email across 3 iterations on 04/07/2025. Most recent submission content and officer response below

Re: Submission: Proposed Differential Rates 2025/2026

  Reply  Reply All  Forward  

Fri 4/07/2025 7:46 PM

Caution! This message was sent from outside your organization.

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Good Evening Mr Bailey,

After some thought, I have revised my submission. Please accept it.

### Formal Submission Opposing the Proposed Differential General Rates – Shire of Dandaragan 2025–2026

This submission is presented in formal opposition to the Shire of Dandaragan's proposed differential general rates for the 2025–2026 financial year. It draws on public documentation, consultation procedures, and policy requirements under the Department of Local Government, Sport and Cultural Industries (DLGSC) Rating Policy: Differential Rates. The submission demonstrates that the proposal fails to meet the standards of objectivity, fairness, consistency, and transparency, and respectfully requests that it be dismissed in its current form.

#### 1. Summary of Grounds for Dismissal

- Lack of transparency in financial justification – internal modeling and cost breakdowns have not been released to the public.
- Inadequate consultation – public notices were published in limited and localised formats, potentially excluding many affected ratepayers.
- Lack of objective service impact evidence – rate categories such as Renewable Energy and Mining are not shown to demand higher services from the Shire.
- Absence of clarity on revenue allocation – no details provided on how new revenue will be spent, raising accountability concerns.
- Premature adoption – Council endorsed the model 'in principle' before ratepayer consultation had closed or data was released.
- Use of broad economic trends – the WALGA LGCI briefing is general and not specific to Dandaragan's financial position.
- Disproportionate impositions – the proposed UV Mining Exploration rate is 27 times higher than UV General, without cost justification.

#### 2. Failure to Meet DLGSC Rating Policy Key Values

##### Objectivity

No localised cost modelling, impact analysis, or category-based service data has been provided to support the rate increases. Assumptions about land use cost burden (e.g. Renewable Energy) are presented without operational evidence.

##### Fairness and Equity

Wind farms, for example, are self-sufficient developments with low reliance on Shire services. They do not use public facilities, waste services, or social infrastructure. The assumption that they should contribute at a higher rate contradicts the principle of equitable treatment.

##### Consistency

There is no reference to differential rates or cost justification in the Shire's Local Planning Strategy. The proposed rate model represents a significant shift without evidence of long-term planning alignment.

##### Transparency and Administrative Efficiency

Financial modelling referred to in the Statement of Objects and Reasons has not been made public. FOI requests have been required to access basic justification materials, and consultation channels have not been equitably accessible across the Shire's geographic base.

#### 3. Procedural Integrity and Consultation Shortcomings

The Shire issued notices in publications that do not reach the majority of ratepayers. Only 94 letters were sent, despite multiple affected categories. There has been no evidence provided that affected landholders were adequately informed, nor that public responses have been reviewed equally. This undermines the integrity of the consultation process.

#### 4. Request for Dismissal of Current Proposal

Based on the above points, I respectfully request that the Shire of Dandaragan abandon its current differential general rate proposal for 2025–2026. If the Council wishes to pursue reform, it should initiate a revised process that includes:

- Full publication of financial modeling and cost analysis tied to rate categories.
- Clear expenditure plans showing how additional revenue will be allocated.
- A renewed, equitably distributed consultation campaign across the full ratepayer base.
- A revised justification model that uses evidence-based service demand comparisons for each land use category.

This submission is made in the interest of fair governance, transparent decision-making, and procedural integrity in line with the DLGSC Rating Policy.

Yours sincerely,

Submission	Officer Comment
<p><b>Formal Submission Opposing the Proposed Differential General Rates – Shire of Dandaragan 2025–2026</b>  <b>This submission is presented in formal opposition to the Shire of Dandaragan’s proposed differential general rates for the 2025–2026 financial year. It draws on public documentation, consultation procedures, and policy requirements under the Department of Local Government, Sport and Cultural Industries (DLGSC) Rating Policy: Differential Rates. The submission demonstrates that the proposal fails to meet the standards of objectivity, fairness, consistency, and transparency, and respectfully requests that it be dismissed in its current form.</b></p>	<p>The proposed differential rates have been developed in accordance with the legislative framework and DLGSC guidance, with the clear intent of ensuring long-term financial sustainability and a more equitable distribution of rating contributions. The model recognises the varying impacts of land uses on Shire resources and community infrastructure. While Council will consider all submissions before making a final determination, the Shire stands by the rationale and integrity of the proposed rating structure.</p>
<p><b>Lack of transparency in financial justification – internal modeling and cost breakdowns have not been released to the public</b></p>	<p>The proposed differential rates are underpinned by detailed financial modelling and cost analysis conducted in line with legislative obligations and the DLGSC Rating Policy. While there is no legal requirement to publish internal modelling, the Shire has undertaken comprehensive analysis to support the proposed structure. This modelling has been provided in full to elected members to inform decision-making. Due to the inclusion of confidential and property-specific information, the modelling cannot be made publicly available without breaching privacy obligations. The financial basis for the proposal is sound, responsible, and appropriately supported.</p>

<b>Inadequate consultation – public notices were published in limited and localised formats, potentially excluding many affected ratepayers</b>	The consultation process met all statutory requirements under the <i>Local Government Act 1995</i> , including publication in a statewide newspaper, on the Shire’s website, and direct written notification to ratepayers likely to be affected by proposed rating changes. While the Shire considers the process to have been appropriate and compliant, it acknowledges that broader communication methods could be considered in future to enhance reach and engagement across the district.
<b>Lack of objective service impact evidence – rate categories such as Renewable Energy and Mining are not shown to demand higher services from the Shire</b>	The proposed rate structure is based on sound financial modelling and complies with all relevant legislative and policy requirements. While the detailed modelling was not publicly released, it underpins the basis for the rate categories, including Renewable Energy and Mining.
<b>Absence of clarity on revenue allocation – no details provided on how new revenue will be spent, raising accountability concerns</b>	Officers acknowledge the importance of transparency regarding the allocation of new revenue generated from the proposed rates. While specific expenditure details were not included in the initial consultation materials, the allocation of revenue will be clearly outlined and approved through the formal budget adoption process. The Shire remains committed to accountable financial management and ensuring that any additional revenue is directed towards maintaining and improving services that benefit the community. Further information will be provided as part of the budget documentation to enhance clarity and address accountability concerns.
<b>Premature adoption – Council endorsed the model 'in principle' before ratepayer consultation had closed or data was released.</b>	Council endorsed the draft model “in principle” to enable public consultation. This is standard practice and does not represent a final decision. All public submissions will be considered before the model is finalised.
<b>Use of broad economic trends – the WALGA LGCI briefing is general and not specific to Dandaragan’s financial position.</b>	WALGA's data and indices are used as one input among others, including local context, infrastructure needs, and operational costs. The Shire balances local relevance with sector-wide benchmarking.
<b>Disproportionate impositions – the proposed UV Mining Exploration rate is 27 times higher than UV General, without cost justification</b>	The higher rate reflects the distinct land use, commercial intent, and low community infrastructure contribution typically associated with mining exploration leases. The proposed rate is consistent with approaches used by other regional local governments and subject to Ministerial approval.
<b>Failure to Meet DLGSC Rating Policy Key Values Objectivity</b>	While detailed localised cost modelling and category-specific service data were not published as part of this proposal, internal service cost analysis was thoroughly conducted and formed a critical part of the rating structure development. The



<p><b>No localised cost modelling, impact analysis, or category-based service data has been provided to support the rate increases. Assumptions about land use cost burden (e.g. Renewable Energy) are presented without operational evidence.</b></p>	<p>assumptions regarding land use and associated cost burdens, including for Renewable Energy, are based on sound operational insights consistent with Shire service delivery. The Shire remains committed to ongoing improvements in transparency and will incorporate more detailed evidence and clearer communication in the delivery of its budget.</p>
<p><b>Fairness and Equity</b>  <b>Wind farms, for example, are self-sufficient developments with low reliance on Shire services. They do not use public facilities, waste services, or social infrastructure. The assumption that they should contribute at a higher rate contradicts the principle of equitable treatment.</b></p>	<p>While renewable energy facilities may not access services in a conventional way, they do create administrative, planning, and regulatory impacts. They also benefit from infrastructure access, land use approvals, and long-term operational oversight, all of which contribute to the Shire's service demand.</p>
<p><b>Consistency</b>  <b>There is no reference to differential rates or cost justification in the Shire's Local Planning Strategy. The proposed rate model represents a significant shift without evidence of long-term planning alignment.</b></p>	<p>The Local Planning Strategy is one of several strategic documents considered in the development of the Shire's rating framework. The proposed rate model reflects a comprehensive approach to meeting current and future financial and service delivery needs, which may not be fully captured in the Local Planning Strategy alone. The Shire maintains that the rate model is appropriate and justified, grounded in sound financial principles and legislative requirements.</p>
<p><b>Transparency and Administrative Efficiency</b>  <b>Financial modelling referred to in the Statement of Objects and Reasons has not been made public. FOI requests have been required to access basic justification materials, and consultation channels have not been equitably accessible across the Shire's geographic base.</b></p>	<p>The financial modelling underpinning the Statement of Objects and Reasons has been prepared in accordance with legislative requirements and internal governance standards. While the detailed modelling has not been publicly released to protect commercial sensitivity and data integrity, key information has been made available through appropriate consultation processes. It is neither standard practice nor appropriate to publish every aspect of the financial modelling.</p>
<p><b>Procedural Integrity and Consultation Shortcomings</b>  <b>The Shire issued notices in publications that do not reach the majority of ratepayers. Only 94 letters were sent, despite multiple affected categories. There has been no evidence provided that affected landholders were adequately informed, nor that public responses have been reviewed equally. This undermines the integrity of the consultation process</b></p>	<p>Consultation efforts have exceeded the minimum procedural requirements. In addition to issuing public notices through multiple channels, the Shire directly sent letters to affected ratepayers, targeting known landholders across all relevant categories. The consultation process has been conducted transparently, with all submissions carefully reviewed, considered and tabled for Council and community review. The Shire is committed to upholding the integrity of its consultation processes and continually seeks to improve community engagement.</p>

<p><b>Request for Dismissal of Current Proposal</b></p> <p><b>Based on the above points, I respectfully request that the Shire of Dandaragan abandon its current differential general rate proposal for 2025–2026. If the Council wishes to pursue reform, it should initiate a revised process that includes:</b></p> <ul style="list-style-type: none"> <li><b>• Full publication of financial modeling and cost analysis tied to rate categories.</b></li> <li><b>• Clear expenditure plans showing how additional revenue will be allocated.</b></li> <li><b>• A renewed, equitably distributed consultation campaign across the full ratepayer base.</b></li> <li><b>• A revised justification model that uses evidence-based service demand comparisons for each land use category.</b></li> </ul> <p><b>This submission is made in the interest of fair governance, transparent decision-making, and procedural integrity in line with the DLGSC Rating Policy</b></p>	<p>Concerns regarding the current differential general rate proposal for 2025–2026 are acknowledged. However, after careful consideration, Council supported the proposal for public advertising as justified and consistent with legislative requirements and sound financial management principles.</p> <p>Financial modelling and internal cost analysis have informed the rate structure, and that expenditure priorities will be clearly outlined as part of the forthcoming budget adoption process. Consultation efforts have been undertaken in accordance with statutory obligations, with a commitment to continually improve engagement and transparency.</p> <p>While the Shire welcomes constructive feedback and remains open to refining future processes, Council has not formed the opinion that dismissal of the current proposal appropriate at this stage. Council has traditionally committed to balancing fiscal responsibility with community needs and will continue to engage with stakeholders to enhance clarity and fairness in future rating reviews.</p>
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9. Received via email on 04/07/2025. Content and officer response below:

To the CEO,

Shire of Dandaragan

Submission to the proposal to increase Shire revenue by way of differential rates

The shire administration has, in its wisdom, created a chart outlining its intent to apply differential rates to different land use business in the Shire of Dandaragan. The chart starts with a proposed differential rate to landowners hosting renewable energy companies and also to mining exploration.

It also has everything else in place in the chart to increase rates in other land use areas once the opposition to these first increases has settled down. I am against these proposals and will list some of the reasons for some of my objections. Some are probably out of my lack of understanding of the proposals but this is largely because the shire has, seemingly, deliberately only released information about these changes on a minimum need to know basis.

In no particular order.

- 1 Does this increase in shire revenues put the award salaries closer to an increase in salary bands that govern salaries. If so, this should be disclosed to rate payers.
- 2 Has this visionary shire office considered what would happen if the future saw offshore Renewables in view of the Jurien town site. Would this be seen as a source of revenue or would it have the same protection that the fishing industry enjoys.
- 3 If a differential rate was applied to intensive agriculture, would it only apply to the area that had a feedlot, or other or would it apply to the whole farm, as the proposal seems to be with renewable rates.
- 4 In the event of a renewable facility being established on a farm that has intensive agriculture with a differential rate applied to it, will that be a double wham of differential rates.
- 5 I have heard on the grapevine that the Shire is of the opinion that this extra tax on ratepayers who host renewable energy projects will not affect the farmer rate payer because the renewable energy companies will reimburse the farmer for the extra rates. Is the Dandaragan Shire assuming this or does it know what is in each lease agreement between land owner and renewable energy company. I know because I have two of them and they have differences. If the Shire knows what is in my lease agreement then there has been a breach of the confidentiality clause in the agreement and this needs to be taken further.
- 6 The Dandaragan Shire has issued a chart showing the different rate in the dollar intensions compared with year on year collections. These figures are clearly provided with intent to deceive as there is no uv dollar figure provided. Figures provided by the shire office compare last years RID with this years RID which is meaningless without this years UV. It seems to me that this is an intentionally deceptive pattern the Dandaragan Shire likes to adopt because last years advertised rate increase did not take into account the abolished discount on rates for early payment. To me, these creative accounting measures are used to deceive, and border on telling untruths.

- 7 I also note in the Dandaragan Shire Council meeting minutes that it is the intention to impose a compulsory community benefit payment to be paid to the shire to go into shire revenue to be used for the benefit of the wider community projects and this being a condition to look favourably toward approvals so that projects can advance. Is this not what the differential rate is for. This is an extreme case of double dipping. A bit like governments charging stamp duty on GST in insurance policies.
- 8 If the renewable energy companies do reimburse the land owners the extra rates that have been levied due to the production of renewable electricity, why does our Shire administration want to increase the workload of its rate payer financiers by adding extra accounting for us to deal with.
- 9 How can the the shire administration justify charging a blanket rate over land when the renewable energy produced from that land will differ in value per hectare from one property to the next.
- 10 Community Benefits payments – we all know that when money goes in to the Shire administrative centre, it doesn't all come out. What we don't know are the amounts.
- 11 I am very happy that the Community Benefits payments donated by the Yandin Wind Farm is distributed by Yandin Wind Farm and volunteers from the Dandaragan community for use with in the Dandaragan locality. The people living in this locality are the people most affected by the development. And the whole of the donation hits the ground. A look at Google Earth shows that the boundaries of Yandin Wind Farm are approximately 23 km from Moora and 75 km from Jurien. The fact that the Dandaragan Shire keeps on about the need for our locality to contribute heavily to the Jurien services for the good of the whole community is incorrect. In this south east portion of the Dandaragan Shire, all our medical and other services come from Moora. I, for one, feel much closer to the Moora community than the Jurien community. If the Dandaragan Shire keeps milking the inland parts of the Shire to promote benefits to the Jurien locality at the expense of its inland localities it will increase a divide that already exists.
- 12 The State Government is working on planning to advance the way renewable energy projects are treated across the State – and what contribution they should make to all communities in a uniform way. Why does the Dandaragan Shire wish to jump in ahead of the Government planning authority to be ahead of the game. The rules may change if the Government looks at how these dealings with renewable energy companies work in Victoria and Queensland. I don't fully understand it but it seems Shire Councils can deal directly with the renewable energy companies and not through the land owner rate system.
- 13 I therefore appeal to the Shire Council to reconsider these bureaucratic money grabs from the farmers who rely on our Shires governance, and if you wish to proceed with the intention of user pays for road maintenance and institutional workload, take it up with the renewable energy providers directly at the point of initial discussions, and make them feel welcome into the Shire of Dandaragan. Please be nice to them. They are not the enemy. And please support the farmers who have given up their long held privacy, taken on some inconvenience and a certain amount of primary production loss for an alternative land use. This to help drought proof their business and provide renewable electric power for the greater good. Farmers who proceed with these projects should be applauded, not penalised.

Dandaragan

Submission	Officer Comment
<p><b>Submission to the proposal to increase Shire revenue by way of differential rates</b></p> <p><b>The shire administration has, in its wisdom, created a chart outlining its intent to apply differential rates to different land use business in the Shire of Dandaragan. The chart starts with a proposed differential rate to landowners hosting renewable energy companies and also to mining exploration.</b></p> <p><b>It also has everything else in place in the chart to increase rates in other land use areas once the opposition to these first increases has settled down. I am against these proposals and will list some of the reasons for some of my objections. Some are probably out of my lack of understanding of the proposals but this is largely because the shire has, seemingly, deliberately only released information about these changes on a minimum need to know basis.</b></p>	<p>Concerns regarding the differential rates proposal are acknowledged and it is understood that changes to rate structures can generate questions and uncertainty. The proposed differential rates have been developed through comprehensive financial analysis and are designed to ensure a fair and sustainable distribution of the Shire's revenue requirements across different land use categories.</p> <p>The Shire strives to provide clear and accessible information to all ratepayers and regrets if the communication to date has been perceived as limited. Efforts have been made to share relevant details through various channels, and the Shire remains committed to improving transparency and engagement in future consultations.</p> <p>The proposed rates are not intended to be implemented in a staged manner but rather represent a holistic approach to address the Shire's current and future financial responsibilities. The Shire encourages ongoing feedback and is available to provide further clarification to support community understanding.</p>
<p><b>Does this increase in shire revenues put the award salaries closer to an increase in salary bands that govern salaries. If so, this should be disclosed to rate payers.</b></p>	<p>The proposed increase in Shire revenues is intended to support the overall operational and service delivery costs of the Shire, including employee salaries. While adjustments to salaries are governed by separate processes and relevant industrial awards, any changes to salary bands are determined independently of the rate setting process. The Shire is committed to transparency and will disclose relevant financial impacts in accordance with standard budget and reporting practices.</p>

<p><b>Has this visionary shire office considered what would happen if the future saw offshore Renewables in view of the Jurien town site. Would this be seen as a source of revenue or would it have the same protection that the fishing industry enjoys.</b></p>	<p>The Shire is aware of emerging trends in renewable energy, including the potential for offshore developments. However, such projects fall primarily under the jurisdiction of State and Federal governments, and are not within the direct authority of Local Government. Any future consideration of offshore facilities, including potential revenue implications, would be guided by broader legislative frameworks and national planning policies. The Shire respects the protections afforded to established industries such as fishing and will continue to advocate for balanced outcomes that consider both existing community interests and future opportunities.</p>
<p><b>If a differential rate was applied to intensive agriculture, would it only apply to the area that had a feedlot, or other or would it apply to the whole farm, as the proposal seems to be with renewable rates.</b></p>	<p>Differential rates for categories such as Intensive Agriculture are applied based on the predominant land use of the rateable property, as defined by relevant land use classifications and in accordance with legislative guidelines. The rating is not restricted to a specific portion of the land (e.g., a feedlot), but applies to the entire property if the overall land use aligns with the differential rate category. If a landowner believes their property has been incorrectly categorised or that the land use is substantially different, they are encouraged to contact the Shire to discuss their individual circumstances.</p>
<p><b>In the event of a renewable facility being established on a farm that has intensive agriculture with a differential rate applied to it, will that be a double wham of differential rates</b></p>	<p>Where multiple land uses exist on a single property, the Shire applies the differential rate based on the land use as defined in the approved Development Applications (DAs) submitted to the Shire. Only one differential rating category can be applied to a rateable property at any given time. This ensures there is no “double charging.” For example, if a property includes both Intensive Agriculture and Renewable Energy activities, the rating category will be determined based on the land use identified in the DAs. If there is uncertainty or disagreement about the classification, landowners are encouraged to contact the Shire to discuss their specific circumstances.</p>

<p><b>I have heard on the grapevine that the Shire is of the opinion that this extra tax on ratepayers who host renewable energy projects will not affect the farmer rate payer because the renewable energy companies will reimburse the farmer for the extra rates. Is the Dandaragan Shire assuming this or does it know what is in each lease agreement between land owner and renewable energy company. I know because I have two of them and they have differences. If the Shire knows what is in my lease agreement then there has been a breach of the confidentiality clause in the agreement and this needs to be taken further.</b></p>	<p>The Shire does not have access to individual lease agreements between landowners and renewable energy companies, respecting confidentiality obligations. The Shire's position is based on general industry practices and does not assume specific arrangements or reimbursements.</p>
<p><b>The Dandaragan Shire has issued a chart showing the different rate in the dollar intensions compared with year on year collections. These figures are clearly provided with intent to deceive as there is no uv dollar figure provided. Figures provided by the shire office compare last years RID with this years RID which is meaningless without this years UV. It seems to me that this is an intentionally deceptive pattern the Dandaragan Shire likes to adopt because last years advertised rate increase did not take into account the abolished discount on rates for early payment. To me, these creative accounting measures are used to deceive, and border on telling untruths.</b></p>	<p>The Shire presents differential rate information and revenue projections in accordance with all statutory requirements. Valuations, including Unimproved Value (UV) and Gross Rental Value (GRV), are independently assessed by the Valuer General, and the Shire has no influence over how these valuations are calculated or applied.</p> <p>The Rate in the Dollar (RID) is published as required and is intended to provide a consistent basis for comparison year-on-year. While the RID may be viewed alongside past collections, it is not possible to publish every landowner's individual UV due to privacy and confidentiality obligations. However, any landowner wishing to understand how their property has been valued is encouraged to contact the Shire directly, where this information can be provided individually.</p> <p>The removal of the early payment discount was separately adopted as part of a broader review of rating and financial management practices. It was not intended to obscure the impact of rate changes, and the Shire maintains that all public information has been provided in good faith, with the intent to inform the community transparently and responsibly.</p>

<p><b>I also note in the Dandaragan Shire Council meeting minutes that it is the intention to impose a compulsory community benefit payment to be paid to the shire to go into shire revenue to be used for the benefit of the wider community projects and this being a condition to look favourably toward approvals so that projects can advance. Is this not what the differential rate is for. This is an extreme case of double dipping. A bit like governments charging stamp duty on GST in insurance policies.</b></p>	<p>Community Benefit Payments and differential rates serve distinct purposes. Differential rates are applied as part of the Shire's revenue framework to fund services, while community benefit payments are negotiated contributions related to specific developments. Both are managed transparently within governance frameworks.</p>
<p><b>If the renewable energy companies do reimburse the land owners the extra rates that have been levied due to the production of renewable electricity, why does our Shire administration want to increase the workload of its rate payer financiers by adding extra accounting for us to deal with.</b></p>	<p>Concerns about landowners' administrative workload are acknowledged. Any reimbursements between renewable energy companies and landowners are private arrangements and do not impact the Shire's rating administration processes.</p>
<p><b>How can the the shire administration justify charging a blanket rate over land when the renewable energy produced from that land will differ in value per hectare from one property to the next.</b></p>	<p>Differential rates are applied based on land use categories and valuations determined independently by the Valuer General. These valuations reflect market conditions and land use factors, including the presence and scale of renewable energy infrastructure. While the amount of renewable energy produced may vary between properties, the valuation process considers these differences, meaning properties with more extensive renewable energy development are generally valued higher and therefore attract higher rates. The Shire applies a consistent rating framework to ensure equity across all land use categories, based on the valuations provided.</p>
<p><b>Community Benefits payments – we all know that when money goes in to the Shire administrative centre, it doesn't all come out. What we don't know are the amounts.</b></p>	<p>The Shire is committed to financial transparency. Details regarding community benefit payments and their allocation are disclosed through Shire financial reports and relevant community communications.</p>
<p><b>I am very happy that the Community Benefits payments donated by the Yandin Wind Farm is distributed by Yandin Wind Farm and volunteers from the Dandaragan community for use with in the Dandaragan locality. The</b></p>	<p>The contribution made by Yandin Wind Farm through its Community Benefit Fund is acknowledged and welcomed. It is administered locally with volunteer involvement and supports initiatives within the Dandaragan</p>

<p><b>people living in this locality are the people most affected by the development. And the whole of the donation hits the ground. A look at Google Earth shows that the boundaries of Yandin Wind Farm are approximately 23 km from Moora and 75 km from Jurien. The fact that the Dandaragan Shire keeps on about the need for our locality to contribute heavily to the Jurien services for the good of the whole community is incorrect. In this south east portion of the Dandaragan Shire, all our medical and other services come from Moora. I, for one, feel much closer to the Moora community than the Jurien community. If the Dandaragan Shire keeps milking the inland parts of the Shire to promote benefits to the Jurien locality at the expense of its inland localities it will increase a divide that already exists.</b></p>	<p>locality. We recognise that residents in proximity to such developments are often most directly impacted and that local benefit delivery is important. However, Community Benefit Payments are entirely separate from the rating system. These funds are provided for specific purposes, and any amounts received by the Shire are acquitted in accordance with the relevant agreements, ensuring they are directed toward intended outcomes, as you rightly noted, “hitting the ground” in affected areas.</p> <p>The proposed differential rating model is a separate funding mechanism intended to support the Shire’s overall capacity to deliver services across the entire district. Funds raised through rates are allocated by Council during the annual budget process, with consideration given to both local and broader community needs to ensure equity across the Shire’s diverse regions. The Shire is committed to continuing to improve this balance as part of its long-term financial planning.</p>
<p><b>The State Government is working on planning to advance the way renewable energy projects are treated across the State – and what contribution they should make to all communities in a uniform way. Why does the Dandaragan Shire wish to jump in ahead of the Government planning authority to be ahead of the game. The rules may change if the Government looks at how these dealings with renewable energy companies work in Victoria and Queensland. I don’t fully understand it but it seems Shire Councils can deal directly with the renewable energy companies and not through the land owner rate system.</b></p>	<p>The Shire closely monitors State Government initiatives related to renewable energy projects and will adapt its policies accordingly. However, local government retains the authority to manage local rating and planning matters within legislative frameworks.</p>
<p><b>I therefore appeal to the Shire Council to reconsider these bureaucratic money grabs from the farmers who rely on our Shires governance, and if you wish to proceed with the intention of user pays for road maintenance and institutional workload, take it up with the renewable</b></p>	<p>The significant contributions of landowners supporting renewable energy developments are valued. The intention of the differential rating framework is not to penalise but to ensure a fair distribution of costs related to increased service demands. The Shire is committed to working collaboratively with</p>



<p><b>energy providers directly at the point of initial discussions, and make them feel welcome into the Shire of Dandaragan. Please be nice to them. They are not the enemy. And please support the farmers who have given up their long held privacy, taken on some inconvenience and a certain amount of primary production loss for an alternative land use. This to help drought proof their business and provide renewable electric power for the greater good. Farmers who proceed with these projects should be applauded, not penalised.</b></p>	<p>landowners and renewable energy companies to support sustainable development and community wellbeing.</p>
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10. Peter & Patricia Sudholz. Received on email 05/07/2025. Content and Officer Submission below:

Brent Bailey  
Chief Executive Officer  
Shire of Dandaragan

Dear Brent

**We are replying to the Proposed Introduction of Differential Rating-Notice and Invitation for Submissions** that the Dandaragan Shire is proposing to introduce.

With these changes our property will now be identified as a **UV Renewable Energy** property.

There are some questions that need to be answered:

- We are wanting to know whether the whole property will be classified as a **UV Renewable Energy** property or will it be the area where the turbines are standing?
- Are the rates going to be going up on the whole property or part of it?
- Wind Farms do not go on forever, so when or if the Badgingarra Wind Farm stops producing what then happens to the rates? Does it go back to Rural Category, or does it stay as Renewable Energy Category?
- If the Shire deems it necessary to try and increase the income, they need to directly tax the Renewable energy industry, not the landowner. This is just another way to raise revenue for the shire.

The Government are pushing for renewable energy and are needing the land to proceed. When the landowner allows for their property to be used for renewable energy structures, they are then hit by Local Government wanting to introduce new categories on our land so they can put the rates up.

As farmers we get nothing for our rates as it is. We live on gravel roads that are rarely maintained now by the local shire. If these rates do go up, are the farms which are involved with the UV Renewable Energy re-zoning how are they going to benefit? (I can tell you now, it won't get used out in the farming communities, eg: maintaining roads.)

This notice wasn't sent to us until the 4/07/25, why did we not receive it earlier? This looks highly suspicious of the Shire not wanting transparency on this matter.

Your Sincerely

Peter & Patricia Sudholz

Submission	Officer Comment
<p><b>We are wanting to know whether to whole property will be classified as a UV Renewable Energy property or will it be the area where the turbines are standing?</b></p>	<p>The classification of a property for rating purposes is based on its land use, as determined through approved Development Applications and in accordance with legislative and valuation guidelines. Where renewable energy infrastructure, such as wind turbines, is present on a property, the entire land parcel may be classified under the UV Renewable Energy category. However, each property is assessed individually, considering the scale and impact of the renewable infrastructure relative to other land uses on the property. If landowners believe that the classification does not accurately reflect the primary use of their property, they are encouraged to contact the Shire to discuss their specific circumstances.</p>
<p><b>Are the rates going to be going up on the whole property or part of it?</b></p>	<p>Rates are applied to the entire property based on its land use classification, as determined by the Shire in accordance with legislative requirements and valuation advice. If the land use of the property falls within a differential rate category—such as Renewable Energy—then the whole property will be rated under that category, not just the portion where the infrastructure is located.</p>
<p><b>Wind Farms do not go on forever, so when or if the Badgingarra Wind Farm stops producing what then happens to the rates? Does it go back to Rural Category, or does it stay as Renewable Energy Category?</b></p>	<p>If a wind farm ceases operation, the classification of the property would be reviewed by the Shire in accordance with current land use and valuation assessments. Typically, if the infrastructure is no longer operational or removed, the property's rating category would revert to the most appropriate classification based on its predominant land use at that time, such as Rural.</p>

<p><b>If the Shire deems it necessary to try and increase the income, they need to directly tax the Renewable energy industry, not the landowner. This is just another way to raise revenue for the shire.</b></p>	<p>The Shire's rating framework is developed in accordance with legislative provisions that empower local governments to levy rates based on land use classifications. Currently, direct taxation of the renewable energy industry itself is not within the Shire's authority. Instead, rates are applied to landowners according to the use of their land, including renewable energy developments.</p> <p>The Shire's approach aims to fairly distribute costs associated with service delivery and infrastructure, reflecting the demands placed on the community by various land uses. The proposed differential rates are intended to ensure equity and sustainability in revenue, rather than simply increasing income.</p>
<p><b>The Government are pushing for renewable energy and are needing the land to proceed. When the landowner allows for their property to be used for renewable energy structures, they are then hit by Local Government wanting to introduce new categories on our land so they can put the rates up.</b></p>	<p>The important role that renewable energy projects play in supporting government policies and sustainable development is recognised. When landowners agree to host renewable energy infrastructure, it does result in a change to the land's primary use classification, which can affect rating categories.</p> <p>The introduction of differential rates reflects the Shire's responsibility to fairly allocate the costs of maintaining and upgrading infrastructure and services that support all land uses, including renewable energy developments. This approach is intended to ensure equity among ratepayers, taking into account the varying demands different land uses place on Shire resources.</p>

<p><b>As farmers we get nothing for our rates as it is. We live on gravel roads that are rarely maintained now by the local shire. If these rates do go up, are the farms which are involved with the UV Renewable Energy re-zoning how are they going to benefit? (I can tell you now, it won't get used out in the farming communities, eg: maintaining roads.)</b></p>	<p>The vital role that farmers play in our community is respected and concerns regarding service levels are acknowledged, particularly road maintenance in rural areas. Revenue generated through rates, including the proposed differential rates for UV Renewable Energy properties, contributes to the overall funding required to maintain and improve infrastructure and services across the entire Shire.</p> <p>While specific projects and service priorities are determined through the annual budget process by elected representatives, the Shire is committed to ensuring that rural communities receive appropriate and equitable support. The Shire welcomes ongoing feedback from farmers and rural residents to help inform service delivery and investment decisions that benefit all areas, including farming localities.</p>
<p><b>This notice wasn't sent to us until the 4/07/25, why did we not receive it earlier? This looks highly suspicious of the Shire not wanting transparency on this matter.</b></p>	<p>The Shire's administration regrets any concerns caused by the timing of the notice delivery. Public notices were issued in accordance with statutory requirements and timelines set out in relevant legislation. While the Shire makes every effort to ensure timely communication, factors such as postal services and administrative processes can affect delivery dates for individualised letters.</p> <p>The Shire remains committed to transparency and open communication and encourages ratepayers to contact the Shire directly with any concerns or questions to ensure they receive all necessary information.</p>

11. Lawrie Short (Submission 3). Received on email 06/07/2025. Content and Officer response below:

Differential Rates , in regard Wind Generators on Private Property.



Lawrie Short [REDACTED]

[Reply](#) [Reply All](#) [Forward](#) [More](#)  
Sun 6/07/2025 1:27 PM

Caution! This message was sent from outside your organization.

ATTENTION PRESIDENT, COUNCILLORS AND ADMINISTRATION.

"Without Precedent."

I once again make comment, particularly in view of the Published date of the proposed Public Meeting on the 9th of July 2025, with confirming information :-

There is now clear identification of the means by which the Rates will be applied , under the given LG Policy:-

1. Undoubtedly there is intent to treat the Farmers ( Land Owners) as participants in the business of providing wind power and sharing profits, as best fits the agreement:-
2. Item one above is not correct as the Farmers are the Sole (Heirs and Successors) Owners of their subject land ( in what ever means by which they insure ownership , trusts, self managed Superannuation etc);
3. Thus ownership is clearly not owned by the Developers, which makes it absolutely impossible and cannot be the Farmers responsibility to pay rates for them, as the Farmers are only seeing it as their Public Duty for the Public Good, to help in the Federal Government ( as financial supporters) in getting the Wind Farms off the ground and the stated policy of the WA Government to provide Green Energy for the Whole State of WA;
4. The subject Policy is quite clear in regard the above, however should the Farmer or his trading Partnership or Duly Registered Pty Ltd Company come to a suitable agreement of ownership with the Developers, clearly identifying combined ownership the situation is possible for reconsideration.

Should it be that there is a case for consideration of approval, wherein another Council has achieved Public Agreement for a similar exercise, creating a Precedent, I suggest caution as it may be fraught with Litigious Outcomes !

Lawrie Short,  
6/07/25.

Disclaimer: These thoughts are of my own understanding.

Sent from my iPhone

Submission	Officer Comment
<p><b>ATTENTION PRESIDENT, COUNCILLORS AND ADMINISTRATION.</b>  <b>“Without Precedent.”</b>  <b>I once again make comment, particularly in view of the Published date of the proposed Public Meeting on the 9th of July 2025, with confirming information :-</b>  <b>There is now clear identification of the means by which the Rates will be applied , under the given LG Policy:-</b>  <b>1. Undoubtedly there is intent to treat the Farmers ( Land Owners) as participants in the business of providing wind power and sharing profits, as best fits the agreement</b></p>	<p>The application of differential rates is not based on the financial arrangements or profit-sharing agreements between landowners and renewable energy companies. Instead, the Shire is required to assess and rate properties based on their land use, as defined under relevant legislation and supported by Development Approvals. Where renewable energy infrastructure forms use of the land, it may fall into the UV Renewable Energy category, irrespective of individual lease or income arrangements.</p> <p>The intent of the rating framework is not to penalise landowners, but to ensure that properties hosting large-scale infrastructure are contributing equitably to the cost of services and infrastructure that support the wider community. All feedback received will be considered as part of the consultation process, and the Shire remains committed to transparency and fairness in its decision-making.</p>
<p><b>2. Item one above is not correct as the Farmers are the Sole (Heirs and Successors) Owners of their subject land ( in what ever means by which they insure ownership , trusts, self managed Superannuation etc);</b></p>	<p>The application of differential rates does not alter or challenge ownership status in any way.</p> <p>However, under the <i>Local Government Act 1995</i>, local governments are required to assess properties based on land use, not ownership structure, when determining rating categories. Where a property’s use is aligned with renewable energy generation, and that use has been approved through Development Applications, it may be classified accordingly under the UV Renewable Energy category. This approach ensures consistency, equity, and compliance with legislative requirements, while respecting the legal rights and ownership of all landholders.</p>

<p><b>3. Thus ownership is clearly not owned by the Developers, which makes it absolutely impossible and cannot be the Farmers responsibility to pay rates for them, as the Farmers are only seeing it as their Public Duty for the Public Good, to help in the Federal Government ( as financial supporters) in getting the Wind Farms off the ground and the stated policy of the WA Government to provide Green Energy for the Whole State of WA;</b></p>	<p>This legal ownership is not in dispute.</p> <p>However, under the <i>Local Government Act 1995</i> and associated rating principles, rates are levied on the owner of the land, based on the <i>use</i> of that land, not the financial beneficiary of that use. Where land is used, in whole or in part, for renewable energy generation through an approved development, and that use is an activity on the property, it may be classified under the UV Renewable Energy rating category.</p> <p>The Shire recognises and appreciates the contribution of landowners who support renewable energy projects in the interest of public good and broader sustainability goals. Nonetheless, the Shire is required to apply a consistent and equitable rating approach that reflects the impact and intensity of land use, rather than the intentions or benefits of the landowner. These decisions are made within the boundaries of the current legislative framework and are aimed at ensuring all land uses contribute fairly to the cost of community infrastructure and services.</p>
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<p><b>4. The subject Policy is quite clear in regard the above, however should the Farmer or his trading Partnership or Duly Registered Pty Ltd Company come to a suitable agreement of ownership with the Developers, clearly identifying combined ownership the situation is possible for reconsideration.</b></p>	<p>Ownership arrangements may vary and can involve individuals, partnerships, trusts, or companies. However, for rating purposes, the Local Government Act 1995 requires that rates be issued to the registered owner of the land as recorded by Landgate, regardless of any separate agreements or commercial arrangements with developers.</p> <p>Unless there is a formal change in land ownership—such as a joint ownership arrangement legally recognised and registered—responsibility for rates remains with the landowner. Private agreements between landowners and developers, including cost-sharing or reimbursement clauses, are not considered by the Shire when determining rating liability, as these agreements fall outside the scope of local government assessment processes.</p> <p>Should a property’s ownership structure change in a legally recognised and documented way, the Shire would reassess the situation in accordance with applicable laws and policies.</p>
<p><b>Should it be that there is a case for consideration of approval, wherein another Council has achieved Public Agreement for a similar exercise, creating a Precedent, I suggest caution as it may be fraught with Litigious Outcomes !</b></p>	<p>Concerns regarding precedent and potential legal implications are noted. While decisions made by other local governments may provide context, they do not create binding precedents for the Shire of Dandaragan. Each Council must assess its rating structure based on its own local circumstances, financial responsibilities, community needs, and compliance with relevant legislation.</p> <p>The Shire is mindful of its legal obligations and undertakes all rating decisions with due diligence, informed by policy, legislative frameworks, and legal advice where necessary. Community feedback is an important part of this process, and all submissions are carefully considered to ensure that outcomes are fair, lawful, and in the public interest.</p>

12. Aubrey & Lisa Panizza. Received on email 06/07/2025. Content and Officer response below:

Aubrey & Lisa Panizza

4th July 2025

**Mr Brent Bailey**

Chief Executive Officer, Shire of Dandaragan  
PO Box 676  
Jurien Bay WA 6516

**Re: Submissions from a Ratepayer with respect to the proposed differential rates for properties described as UV Renewable Energy**

Dear Brent and Shire Councillors

I am the owner of the farm property address [REDACTED] in the Shire of Dandaragan. The farm leases land to host wind energy generation.

**Your rating proposal is grossly unfair.**

The Shire gave approval to each renewable energy project in the shire of Dandaragan. Each project was approved without any specific Shire imposed encumbrances for farming property owners. The Shire published that it had given approval because the projects would be beneficial for the shire, that it showed the Shire was actively supporting renewable energy generation and extending its industry base and employment opportunity.

So now the Shire proposes different rating for farms hosting renewable energy production because it wants to make some cash from the renewables energy industry!

So, what's stopping the Shire charging other businesses that work out of the farm. There are lots of people that have small and large businesses running out of their farms all over the Shire of Dandaragan.

The proposed cost rating of properties that have renewable energy is an afterthought. And a money hungry Shire is not a good one.

You claim "higher costs to Shire as a result of these (renewable energy projects). This claim has not been established by anyone and should not be accepted as fact.

The suggestion that Shire costs are increased by the ongoing gravel road usage by renewable energy projects is a lot of crap. The number of windfarm vehicles would not be the only cores. Maybe you should be looking at the extra cars that tourism makes on our roads.

And don't licence cars and trucks pay road taxes? So, we are already paying for the use of road up keep.

**Why your rating proposal is unfair and targeting a small number of businesses in the Shire of Dandaragan.**

between renewables lease benefit and rates charged. The proposal by the Shire is an arbitrary cash grab.

The Council is proposing to rate farms on their source of income. Farmers leasing a fraction of their farming land for renewables generation are to have an additional rates burden because they receive some income from renewable power generation. The Shire is inconsistent; it does not tax other alternate forms of on-farm income generation; income that is not the largest or sole source of income generated of the farming property. The proposal is ethically wrong.

The Council's proposal will be put to people that are uninformed "of the long term consequences

The Shire claims higher costs resulting from renewable energy projects: Then rate/tax the renewable energy project owners, not the contractors (farm owners who lease some land to host Shire supported renewable energy projects).

The proposed cost hike will increase my annual rates by a construal amount.

Responsibility a better world falls on all of us. Where is the equitable burden of cost to all in the Shire of Dandaragan?

The Shire should contact the renewable energy projects; it should contact the project owners and negotiate with them in good faith for mutual benefit.

Yours Sincerely,

Aubrey & Lisa Panizza

Submission	Officer Comment
<p><b>Your rating proposal is grossly unfair.</b></p> <p><b>The Shire gave approval to each renewable energy project in the shire of Dandaragan. Each project was approved without any specific Shire imposed encumbrances for farming property owners. The Shire published that it had given approval because the projects would be beneficial for the shire, that it showed the Shire was actively supporting renewable energy generation and extending its industry base and employment opportunity. So now the Shire proposes different rating for farms hosting renewable energy production because it wants to make some cash from the renewables energy industry!</b></p> <p><b>So, what's stopping the Shire charging other businesses that work out of the farm. There are lots of people that have small and large businesses running out of their farms all over the Shire of Dandaragan.</b></p>	<p>The Shire acknowledges the important role that renewable energy projects play in diversifying the local economy, creating jobs, and contributing to regional development. Approvals for these projects were granted based on planning and land use considerations, in line with the Shire's strategic objectives and the State's policy direction on renewable energy. The introduction of a differential rate for properties hosting large-scale renewable energy infrastructure is not a reversal of that support, but rather a response to the significant changes in land use and the scale of infrastructure now present on those properties. The rating framework is designed to ensure that all land uses contribute fairly to the cost of maintaining local infrastructure and services, particularly where those uses increase service demand, asset wear, or administrative complexity. It is important to note that the Shire proposes to use differential rating for a range of land use types where appropriate. Properties hosting commercial activities—whether agriculture, industry, or renewable energy—are assessed based on the scale, intensity, and nature of use, in accordance with the <i>Local Government Act 1995</i> and associated policies. The Shire remains committed to treating all ratepayers fairly and consistently under the law and welcomes further input from the community through the formal consultation process.</p>
<p><b>The proposed cost rating of properties that have renewable energy is an afterthought. And a money hungry Shire is not a good one.</b></p> <p><b>You claim "higher costs to Shire as a result of these (renewable energy projects). This claim has not been established by anyone and should not be accepted as fact.</b></p> <p><b>The suggestion that Shire costs are increased by the ongoing gravel road usage by renewable energy projects is a lot of crap.</b></p> <p><b>The number of windfarm vehicles would not be the only cores.</b></p>	<p>The landowner's views expressed are acknowledged. The proposed differential rating for renewable energy land use is not an afterthought, nor is it driven by short-term revenue goals. It is part of a broader effort to ensure that the rating framework remains equitable and reflects the evolving land use and infrastructure demands across the Shire. As large-scale infrastructure developments like wind farms become more common, it is appropriate for the Shire to review the way costs are shared. While it is true that vehicle registration fees and fuel taxes contribute to State and Federal road networks, the maintenance and upgrade of local</p>

<p><b>Maybe you should be looking at the extra cars that tourism makes on our roads.</b></p> <p><b>And don't licence cars and trucks pay road taxes? So, we are already paying for the use of road up keep.</b></p>	<p>gravel roads is a direct responsibility of the Shire and must be funded primarily through rates and other local revenue sources. Renewable energy projects, during construction, ongoing maintenance, and eventual decommissioning, can increase pressure on local roads and Shire services in ways that differ from standard farming or residential use. These impacts are observed and recorded by Shire operational teams and contribute to long-term asset management planning.</p> <p>Tourism and other industries also contribute to road use, and the Shire continues to review all commercial and high-impact activities to ensure costs are distributed fairly. The differential rating model is one part of that ongoing effort, and community feedback, including your concerns, is an important part of the decision-making process.</p>
<p><b>Why your rating proposal is unfair and targeting a small number of businesses in the Shire of Dandaragan.</b></p> <p><b>between renewables lease benefit and rates charged. The proposal by the Shire is an arbitrary cash grab. The Council is proposing to rate farms on their source of income.</b></p> <p><b>Farmers leasing a fraction of their farming land for renewables generation are to have an additional rates burden because they receive some income from renewable power generation. The Shire is inconsistent; it does not tax other alternate forms of on-farm income generation; income that is not the largest or sole source of income generated of the farming property. The proposal is ethically wrong.</b></p>	<p>Concerns regarding fairness and consistency in the proposed differential rating for properties hosting renewable energy infrastructure are acknowledged. The proposal is not based on the income received by landowners, nor is it designed to target individual businesses. Rather, it reflects a land use classification approach, consistent with the <i>Local Government Act 1995</i>, which allows local governments to apply differential rates based on the nature and intensity of land use, not the profitability of a venture or the size of income derived.</p> <p>Large-scale renewable energy developments involve significant infrastructure, long-term changes to land use, and increased administrative, planning, and asset management considerations for the Shire. These are materially different in scale and impact compared to more traditional or incidental forms of on-farm income diversification, such as contract work, accommodation, or small business activities.</p> <p>The intent of the proposal is to ensure that properties hosting major infrastructure contribute equitably to the cost of services and infrastructure that support the entire Shire community. The Shire maintains that this approach is consistent with principles of fairness and transparency, and all feedback received during the consultation period will be carefully considered before final decisions are made.</p>

<p><b>The Council's proposal will be put to people that are uninformed "of the long term consequences</b></p>	<p>The concern regarding public understanding of the long-term implications of the proposed rating changes are acknowledged. Transparency and informed community engagement are essential components of any policy review process.</p> <p>The intent of the consultation period is to provide all ratepayers with the opportunity to review the proposal, ask questions, and provide feedback before any final decisions are made. The Shire has made information available through statutory notices, public documents, and community engagement channels, and will continue to provide clarification where needed.</p> <p>Councillors are also required to consider both immediate and long-term implications of any rating decision, including financial sustainability, equity across land uses, and strategic infrastructure needs. Community feedback—such as the concerns you have raised—plays an important role in informing that decision-making process.</p>
<p><b>The Shire claims higher costs resulting from renewable energy projects: Then rate/tax the renewable energy project owners, not the contractors (farm owners who lease some land to host Shire supported renewable energy projects).</b></p>	<p>Concerns regarding who should bear the costs associated with renewable energy projects are acknowledged. However, under current legislation, local governments do not have the authority to directly rate or tax renewable energy project operators or companies. Rates are applied to landowners as the registered owners of the property, in accordance with the <i>Local Government Act 1995</i>.</p> <p>The Shire's rating system reflects land use and the associated impacts on local infrastructure and services.</p>

<p><b>The proposed cost hike will increase my annual rates by a construal amount.</b></p> <p><b>Responsibility [for] a better world falls on all of us. Where is the equitable burden of cost to all in the Shire of Dandaragan? The Shire should contact the renewable energy projects; it should contact the project owners and negotiate with them in good faith for mutual benefit</b></p>	<p>The shared responsibility for sustainability is respected.</p> <p>Under current legislation, the Shire's ability to raise revenue is primarily through rates applied to landowners based on land use classifications. The Shire does not have the authority to directly levy charges on renewable energy project operators. Therefore, the rating framework focuses on the land on which the infrastructure is situated.</p> <p>While the Shire recognises the importance of engaging with renewable energy developers, any negotiations or agreements regarding financial contributions outside of local government rates fall outside the Shire's statutory powers. The Shire continues to advocate for fair and effective partnerships that benefit the entire community, including landowners, project operators, and residents.</p> <p>The Shire remains committed to transparent and equitable processes and values ongoing community feedback as part of this approach.</p>
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13. Received via email 07/07/2025. Content and Officer comment below:

[REDACTED]  
Sent: Sunday, 6 July 2025 9:01 PM  
To: Brent Bailey <[ceo@dandaragan.wa.gov.au](mailto:ceo@dandaragan.wa.gov.au)>  
Subject: [REDACTED] Letter

Caution! This message was sent from outside your organization.

Dear Sir

I was at the meeting at [REDACTED] and fully concur with the sentiments of the meeting and of [REDACTED] letter  
It is disappointing your council did not send correspondence to we ratepayers with plenty of opportunity to respond  
I am not directly involved but my son [REDACTED] is. He happens to be in Europe at the moment and I take the opportunity to speak for him

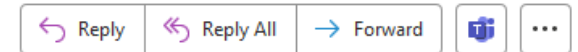
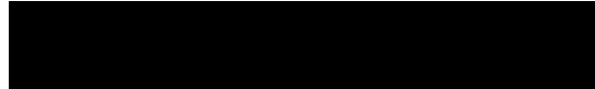
Yours sincerely  
[REDACTED]

Submission	Officer Comment
<p><b>I was at the meeting at X and fully concur with the sentiments of the meeting and of Xs letter</b></p> <p><b>It is disappointing your council did not send correspondence to we ratepayers with plenty of opportunity to respond</b></p> <p><b>I am not directly involved but my son X is. He happens to be in Europe at the moment and I take the opportunity to speak for him</b></p>	<p>The Shire has followed the statutory requirements for public notice under the <i>Local Government Act 1995</i>, including advertising in local publications and notifying affected landowners. While the process has met its legal obligations, we acknowledge that some community members feel additional methods of communication would have been beneficial, and this feedback will be considered for future engagement.</p> <p>The comments and alignment with concerns raised by others in the community have been noted. While we understand you are not directly impacted by the proposed rating category, your representation on behalf of a family member is appreciated. Where possible, it is preferable for submissions to come directly from those affected, but all correspondence received will be reviewed and considered by Council prior to any final decision being made.</p>



14. Received on email 08/07/2025. Content and Officer response below:

## Submission



Tue 8/07/2025 6:16 AM

You forwarded this message on 8/07/2025 7:37 AM.

Caution! This message was sent from outside your organization.

Dear council I am totally opposed to the differential rates that council is proposing.

1 Why should we collect rates on behalf of the shire .

2 If you can charge rates for mining expiration on land that is already paying rates then you should be able to charge rates directly to renewable companies and mines (I feel the ceo is just trying to take the easy way out here).

3 There was no provision in the mining agreement that we had with Iluka that they would pay any increase in rates in the event that rates went up because of them. please note that Iluka Resources has finished mining on our property.

4 If council feels it needs more revenue then look at grv s contained to its neighbouring shire in Moora.

5 My rates has gone up over 22% in the last two years and I see any more service for it.

Regards



Submission	Officer Comment
<p><b>1 Why should we collect rates on behalf of the shire</b></p>	<p>Under the <i>Local Government Act 1995</i>, rates are a form of property-based taxation that applies to landowners, not a collection service on behalf of the Shire. All rateable land within a local government area is subject to rates, which are used to fund the delivery and maintenance of local infrastructure, services, and regulatory responsibilities.</p> <p>Rates are not collected <i>on</i> behalf of the Shire, they are levied by the Shire, as the lawful authority responsible for providing community-wide services such as roads, waste management, environmental health, planning, emergency services support, and recreation facilities.</p> <p>Where land is used for purposes that generate increased administrative complexity, infrastructure demand, or require specific planning and compliance oversight—as is often the case with large-scale developments like renewable energy projects—the application of differential rating ensures that the cost burden is distributed more equitably across land uses.</p> <p>Council will consider the merits of maintaining fairness and transparency are applied in their decision-making process in how rates are applied. The Shire appreciates all community feedback as part of the proposed differential rating framework.</p>
<p><b>2 If you can charge rates for mining expiration on land that is already paying rates then you should be able to charge rates directly to renewable companies and mines (I feel the ceo is just trying to take the easy way out here).</b></p>	<p>Under the Local Government Act 1995, rates must be levied on the registered owner of the land—not on a third-party operator or tenant. This is why mining tenements can be rated directly (as they are separate legal interests), while renewable energy infrastructure on freehold farming land is rated through the landowner.</p> <p>There is currently no legal mechanism for the Shire to charge rates directly to renewable energy companies unless they hold a separate rateable interest. The approach taken reflects legislative requirements—not convenience—and the Shire remains committed to applying the rating framework fairly and lawfully.</p>

<p><b>3 There was no provision in the mining agreement that we had with Iluka that they would pay any increase in rates in the event that rates went up because of them. please note that Iluka Resources has finished mining on our property</b></p>	<p>The Shire does not have access to private agreements between landowners and third-party operators, such as mining or renewable energy companies. Rating is applied to the landholder in accordance with the Local Government Act 1995, regardless of any commercial arrangements in place.</p> <p>Where mining activity has ceased and the associated tenement has been relinquished or removed, the rating classification is reviewed and adjusted accordingly through the annual rates process. If the land has returned to its previous or alternative use, it will be rated under the appropriate category.</p> <p>Landowners are encouraged to contact the Shire if they believe their current land use no longer reflects the differential rating applied.</p>
<p><b>4 If council feels it needs more revenue then look at grv s contained to its neighbouring shire in Moora</b></p>	<p>The Shire regularly reviews its rating strategy to ensure it remains fair, sustainable, and compliant with legislative requirements. While neighbouring local governments may use Gross Rental Value (GRV) more extensively, rating systems vary depending on the mix of land uses, valuation types, and community needs in each district.</p> <p>The Shire of Dandaragan primarily applies Unimproved Value (UV) to rural land in line with State legislation and valuation methods provided by the Valuer General. GRV-based comparisons with other Shires are not always directly applicable but are considered where relevant during strategic reviews.</p>
<p><b>5 My rates has gone up over 22% in the last two years and I see any more service for it</b></p>	<p>The concerns about rate increases and financial implications are acknowledged. Increases in individual rates may result from changes in property valuations issued by the Valuer General, as well as adjustments to the rate in the dollar set each year through the budget process.</p> <p>While some services may not always be immediately visible, rates contribute to the maintenance and delivery of a wide range of essential infrastructure and community services across the Shire. These include road maintenance, waste management, emergency services support, planning, compliance, and community facilities.</p>

15. Received on email 08/07/2025. Content and officer comment below:

[REDACTED]

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**To:** council@dandaragan.com  
**Subject:** Proposed Differential Rates

To The CEO of the Dandaragan Shire,

As Landholders of the Dandaragan Shire, we are very concerned with what council propose to put forward at the next meeting called for on the 9<sup>th</sup> July,2025, regarding the Differential Rating Strategy.

We find it very disturbing that we have had no correspondence and little time to respond from the Shire regarding the proposed changes ,which concern us greatly.

As landholders, we already pay enormous taxes, we live out of town ,have no rubbish pick up, our roads are seldom graded,  
In Dandaragan we run our own Ambulance service and Fire Brigades, the community keeps the town going.

Our Agreements with Mining or Wind Farms is a confidential contact between the persons involved and is total compensation for the use and inconvenience on our land whilst the project is ongoing.

Does Council have knowledge of these contracts as to how much to charge for additional rates? Surely each contract is different. Would there be double dipping if the landowner had both mining and wind towers on the same property?

We thought Council approved of encouraging renewable energy? People might think twice about hosting these companies if it becomes an added burden to landholders and towns would certainly lose their additional support from these big companies.

Does this increase in rates hide a hidden agenda for coastal improvements, which the Shire's agricultural sector seem to prop up in most cases.

Regards

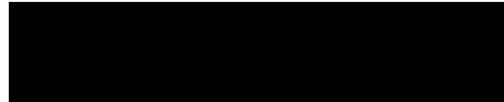
[REDACTED]

Submission	Officer Comment
<p><b>As Landholders of the Dandaragan Shire, we are very concerned with what council propose to put forward at the next meeting called for on the 9th July,2025, regarding the Differential Rating Strategy. We find it very disturbing that we have had no correspondence and little time to respond from the Shire regarding the proposed changes- ,which concern us greatly</b></p>	<p>Concerns regarding the proposed Differential Rating Strategy and the timeframe for consultation are acknowledged. Public notice of the proposal was issued in accordance with the Local Government Act 1995, including advertisement in a local newspapers and publication on the Shire’s website and social media. In addition, letters were sent directly to ratepayers believed to be affected by the proposed changes. While the statutory minimum consultation period of 21 days was adhered to, some landholders may have preferred a longer timeframe or additional correspondence. Feedback on this matter is noted and will be considered in refining future consultation processes. All submissions received by the deadline will be reviewed by Council before a decision is made</p>
<p><b>As landholders, we already pay enormous taxes, we live out of town ,have no rubbish pick up, our roads are seldom graded, In Dandaragan we run our own Ambulance service and Fire Brigades, the community keeps the town going</b></p>	<p>The significant role that rural landholders and volunteers play in supporting their communities is recognised. While some residents in outlying areas may not receive the same level of direct services, such as kerbside waste collection, due to the Shire’s size and geographic spread, this can understandably create a perception of imbalance in the value of rates paid. Although not all services are visible on a daily basis, rates contribute to a broad range of essential functions benefiting the entire district. These include road maintenance, fire and emergency management, compliance services, asset renewal, and long-term infrastructure planning. Additionally, the Shire provides financial and logistical support to local brigades and volunteer-run services wherever possible. The dedication and effort of community members in sustaining their towns is greatly valued, and your feedback will be carefully considered as Council reviews the rating proposal.</p>

<p><b>Our Agreements with Mining or Wind Farms is a confidential contact between the persons involved and is total compensation for the use and inconvenience on our land whilst the project is ongoing.</b></p> <p><b>Does Council have knowledge of these contracts as to how much to charge for additional rates? Surely each contract is different. Would there be double dipping if the landowner had both mining and wind towers on the same property?</b></p>	<p>Confidentiality of agreements between landowners and mining or renewable energy companies is respected, and there is no access to, nor are rates based on, the terms of these private contracts. Rates are determined strictly according to the land's use and valuation as assessed by the Valuer General. Differential rates are applied based on land use classifications, not on compensation arrangements. Additionally, only one differential rate category applies to each property, based on its predominant land use, ensuring that landowners are not subject to multiple rates or "double dipping" for different uses on the same property.</p>
<p><b>We thought Council approved of encouraging renewable energy? People might think twice about hosting these companies if it becomes an added burden to landholders and towns would certainly lose their additional support from these big companies.</b></p>	<p>Support for renewable energy development remains strong as part of a commitment to sustainable growth and environmental responsibility. Hosting renewable energy projects can provide benefits to landholders and the wider community, including economic opportunities and contributions to local infrastructure.</p> <p>The proposed differential rating framework aims to fairly allocate costs associated with increased service demands and infrastructure impacts related to specific land uses, including renewable energy developments. It is not intended to discourage participation or place undue burden on landholders but to ensure equitable contribution towards the costs of maintaining essential services.</p>
<p><b>Does this increase in rates hide a hidden agenda for coastal improvements, which the Shire's agricultural sector seem to prop up in most cases.</b></p>	<p>The proposed rate adjustments are designed to reflect the specific costs associated with different land uses across the entire Shire, including rural and coastal areas. Revenue raised through rates is allocated in accordance with the Shire's budget priorities, which aim to balance the needs of all communities and sectors.</p> <p>There is no separate or "hidden" agenda to use funds from one sector to disproportionately subsidise another. The Shire is committed to transparent and equitable management of its resources to support infrastructure, services, and community wellbeing throughout the district.</p>

16. Received on 07/07/2025. Content and Officer comment below:

## Proposed Rate Changes



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [...](#)

Mon 7/07/2025 4:20 PM

Caution! This message was sent from outside your organization.

[Allow sender](#)

Hi Brent,

We are writing in regard to new proposed rate changes relating to change of land use for renewable energy and mining amongst others.

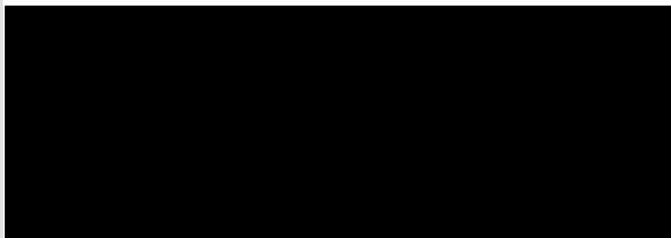
██████████ attended a meeting with other land holders last Sunday, June 29th, who also have some concerns over this change. Rose Glassfurd was in attendance and ██████████ also followed up with a conversation with Graham Lethlean on Monday.

We went to this meeting seeking information and clarification on the proposal. We feel that the shire hasn't communicated well with its rate payers in relation to this. As we do not currently have a renewable project on our property we did not receive a letter explaining the proposal. However, there is a project that could affect us in the future. We feel that all rate payers should be notified in writing to give clarity on the matter and ask that in future, significant changes like this are formally communicated with all rate payers.

Understanding that these levies are designed to be compensated by renewable and mining companies operating in the area, and, that the funds raised are for the Shire and will be used to fund projects and develop facilities in our local community, we support what the shire is trying to achieve. We believe that in all of this there is an opportunity for the Shire to make changes in legislation rather than burdening rate payers. Our belief is that at a rate payer level, the shires ability to access funds is far less than at a legislative level. It also leaves the rate payers in a grey and vulnerable position dependent on confidential agreements between rate payers and other companies which may or may not be in control of these projects in the future.

We hope that our views can be part of the discussion on Wednesday.

Regards



Submission	Officer Comment
<p><b>We went to this meeting seeking information and clarification on the proposal. We feel that the shire hasn't communicated well with its rate payers in relation to this. As we do not currently have a renewable project on our property we did not receive a letter explaining the proposal. However, there is a project that could affect us in the future. We feel that all rate payers should be notified in writing to give clarity on the matter and ask that in future, significant changes like this are formally communicated with all rate payers.</b></p>	<p>Public consultation on rating proposals is guided by legislative requirements, which currently focus written notifications on properties directly affected by a proposed differential rate category. As such, ratepayers without current qualifying land uses, such as those without an active renewable energy project, may not receive individual correspondence.</p> <p>However, it is recognised that proposals of this nature can have broader implications, particularly where land use may change in the future. For this reason, public notices are also placed in local newspapers, on official websites, and through other public channels to reach the wider community.</p>
<p><b>Understanding that these levies are designed to be compensated by renewable and mining companies operating in the area, and, that the funds raised are for the Shire and will be used to fund projects and develop facilities in our local community, we support what the shire is trying to achieve. We believe that in all of this there is an opportunity for the Shire to make changes in legislation rather than burdening rate payers. Our belief is that at a rate payer level, the shires ability to access funds is far less than at a legislative level. It also leaves the rate payers in a grey and vulnerable position dependent on confidential agreements between rate payers and other companies which may or may not be in control of these projects in the future</b></p>	<p>Differential rates are currently the primary tool available to local governments under existing legislation to account for the varying impacts of different land uses. These rates are applied to landowners, as they are the legal ratepayers, regardless of whether third-party projects, such as renewable energy or mining, operate on the land. While compensation from project operators may be included in private agreements, these arrangements vary and are not factored into rating decisions. There is growing interest in legislative reform that could allow more direct contributions from project operators, but such changes would require action at the state level.</p>
<p><b>We hope that our views can be part of the discussion on Wednesday</b></p>	<p>All feedback received during the public consultation period is compiled and considered as part of the Council's decision-making process. Community views, whether submitted in writing, expressed at public meetings, or received through other channels, form an important part of the discussion and help inform final deliberations. The intent is to ensure decisions are made with a clear understanding of the range of perspectives across the district.</p>




17. Duncan Glasfurd. Received on email 08/07/2025. Content and Officer comments below:


## Differential Rates Submission- Duncan Glasfurd



Duncan Glasfurd [REDACTED]

To ○ Records & Faxes

 Follow up. Start by Tuesday, 8 July 2025. Due by Tuesday, 8 July 2025.  
You forwarded this message on 8/07/2025 9:28 AM.

 Reply  Reply All  Forward 

Tue 8/07/2025 8:39 AM

Caution! This message was sent from outside your organization.

I am not against the idea of differential rating, however it must be applied in an equitable manner. With regard to renewables for example, if person A has one large title with 2 wind turbines on it, versus person B who has 7 wind turbines on 1 small title. It is likely person A would have a much larger absolute increase in rates, despite making much less of the wind project. The differential rating should instead be applied on a per mw produced basis, as this is also going to better reflect road use etc as a result of the renewable project.

Alternatively, has it been considered whether the shire individually negotiates with these mining and renewables projects directly? Yes, these mining and renewables projects are going to create additional wear on roads etc, however, if we rate them higher, are these funds actually going to be used to fix up damage caused by these operations or just put into consolidated revenue? I think a better option may be to directly negotiate with the miners and renewable companies directly before implementing these higher rates to see if they will manage wear on roads themselves.

We must also consider that these renewables projects, mining etc - yes they do mean additional wear on shire infrastructure but they are also benefiting the community as a whole- boosting the local economy, providing employment opportunities and contributing to community groups etc. If we inadvertently get these mining and renewables projects to foot the bill for extra rates, they are probably going to reduce funds given to community grants etc.

Submission	Officer Comment
<p><b>I am not against the idea of differential rating, however it must be applied in an equitable manner. With regard to renewables for example, if person A has one large title with 2 wind turbines on it, versus person B who has 7 wind turbines on 1 small title. It is likely person A would have a much larger absolute increase in rates, despite making much less of the wind project. The differential rating should instead be applied on a per mw produced basis, as this is also going to better reflect road use etc as a result of the renewable project.</b></p>	<p>Differential rating is applied based on land use classifications and property valuations, as determined by the Valuer General, rather than project size or energy output. This framework aligns with current legislative requirements, which do not provide for rating based on generation capacity or revenue derived from specific developments.</p> <p>While it is acknowledged that the scale of renewable infrastructure can vary significantly between properties, rating must be applied consistently across all land within a given category. Suggestions such as tying rates to megawatt output or infrastructure density highlight broader policy considerations, and while not currently supported within the existing system, they contribute meaningfully to the ongoing discussion about how best to ensure equity in rating practices.</p>
<p><b>Alternatively, has it been considered whether the shire individually negotiates with these mining and renewables projects directly? Yes, these mining and renewables projects are going to create additional wear on roads etc, however, if we rate them higher, are these funds actually going to be used to fix up damage caused by these operations or just put into consolidated revenue? I think a better option may be to directly negotiate with the miners and renewable companies directly before implementing these higher rates to see if they will manage wear on roads themselves.</b></p>	<p>The current legislative framework does not provide local governments with the ability to rate project operators directly, rates must be levied on the landowner, as they are the legally responsible party under the <i>Local Government Act 1995</i>. As such, differential rating is used to account for the varying impacts of different land uses, including increased infrastructure demands.</p> <p>While direct negotiations with mining or renewable companies may be pursued through other mechanisms, such as voluntary agreements or community benefit contributions, these are separate from the rating process and not enforceable under the same legal provisions. Revenue raised through differential rates contributes to the overall budget, which includes road maintenance and other infrastructure, but is not hypothecated to individual projects or locations unless specifically allocated through the annual budget process.</p>

<b>We must also consider that these renewables projects, mining etc - yes they do mean additional wear on shire infrastructure but they are also benefiting the community as a whole- boosting the local economy, providing employment opportunities and contributing to community groups etc. If we inadvertently get these mining and renewables projects to foot the bill for extra rates, they are probably going to reduce funds given to community grants etc.</b>	<p>Large-scale projects such as renewable energy and mining developments do contribute to local infrastructure use, but they also bring broader economic and social benefits to the community—such as employment, local procurement, and contributions to community groups.</p> <p>Differential rating is not intended to discourage investment or diminish these benefits, but rather to ensure that land uses with higher service impacts contribute appropriately to the shared cost of maintaining infrastructure and services. It is acknowledged that operators may balance their financial contributions across different areas, including sponsorships or grants, and any change in rating structures could influence those decisions.</p> <p>These are important considerations in balancing long-term community benefit, infrastructure sustainability, and a fair approach to revenue generation.</p>
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18. Received on email 08/07/2025. Content and Officer comment below:

## Proposed Differential Rates Increase



Sue Gooch [REDACTED]  
To ○ Records & Faxes

[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [...](#)

Tue 8/07/2025 8:44 AM

**i** Follow up. Start by Tuesday, 8 July 2025. Due by Tuesday, 8 July 2025.  
You replied to this message on 8/07/2025 9:34 AM.

Caution! This message was sent from outside your organization.

Dear Brent & Councillors,

We were unable to attend the meeting held last Sunday by a group of interested landowners/ratepayers, where discussions were held regarding the proposed Differential Rates increase.

It is acknowledged that rural communities have an opportunity to gain financial support from these projects and there have already been very timely contributions made from Alinta (Marri Wind Farm) to the Dandaragan community. The DCC has been fortunate to access funding to enable improvements for their building and the Dandaragan Golf Club has also received financial assistance for the purchase of a much-needed fairway mower. There are also additional funding allocations for projects involving the Dandaragan Primary School and grant availability for successful applicants in the future.

This provides a level of compensation to the community most affected by the development of the renewable energy project. We feel sure that you would agree that the community which is most impacted by these projects is surely the community which in turn, should receive the most compensation.

The receipt of support for the community should be acknowledged and welcomed, not hindered or skewed to enable the Shire of Dandaragan to increase affected landowners/ratepayers financial commitments.

It is acknowledged that Local Government is no longer only responsible for Rates, Rubbish and Roads, however it is also important that the Dandaragan Shire realise the value of being a highly sought after area for wind renewable energy projects and as such welcome the outside investment. It would be unfortunate that this resource and opportunity may be jeopardised due to restricting the guidelines associated with these developments.

It would be most unfair for individual ratepayers and landowners to be penalised with an increase in rates, which should be met by the proponents of these projects.

In reference to the Statement of Objects and Reasons for Differential Rates and Minimum Payments for the year ending 30 June 2026, it would be remiss if a point regarding the section regarding [UV Renewable Energy \(page 5\)](#) "The minimum rate recognizes that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council, regardless of the value of their property." was not addressed. It should be pointed out that a rubbish collection service has not ever been available at the end of our driveway, unlike many others ratepayers in the Shire of Dandaragan. Also, we are more than happy to assist with machinery to clear debris from roads in our area, a cost to us which saves the Shire from deploying their machinery. It is acknowledged that these points may seem petty and very minor in the whole scheme of things, but please accept that we would prefer to work together as a shire of ratepayers, not against one another. As such it is not quite correct "that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council", so perhaps this *Reason* should be deleted.

We expect that a sensible and satisfactory resolution will be realised and the proposed differential rates increase be dismissed.

Regards,

Gordon & Sue Gooch

Submission	Officer Comment
<p><b>We were unable to attend the meeting held last Sunday by a group of interested landowners/ratepayers, where discussions were held regarding the proposed Differential Rates increase.</b></p>	<p>It is noted that a meeting was recently held by a group of interested landowners and ratepayers to discuss the proposed differential rating. This meeting was independently organised by community members and was not arranged or facilitated by the Shire of Dandaragan.</p>
<p><b>It is acknowledged that rural communities have an opportunity to gain financial support from these projects and there have already been very timely contributions made from Alinta (Marri Wind Farm) to the Dandaragan community. The DCC has been fortunate to access funding to enable improvements for their building and the Dandaragan Golf Club has also received financial assistance for the purchase of a much-needed fairway mower. There are also additional funding allocations for projects involving the Dandaragan Primary School and grant availability for successful applicants in the future.</b></p>	<p>Voluntary funding arrangements, such as those referenced, can offer timely support for community-led initiatives and help deliver improvements that may not otherwise be easily resourced. These contributions are typically managed independently of the local rating system and vary by project and operator. While they are welcomed and appreciated within the communities that receive them, they operate separately from formal budget processes and do not offset the broader infrastructure and service responsibilities that local governments are required to manage across the district.</p>
<p><b>This provides a level of compensation to the community most affected by the development of the renewable energy project. We feel sure that you would agree that the community which is most impacted by these projects is surely the community which in turn, should receive the most compensation.</b></p> <p><b>The receipt of support for the community should be acknowledged and welcomed, not hindered or skewed to enable the Shire of Dandaragan to increase affected landowners/ratepayers financial commitments</b></p>	<p>Targeted community benefits can help address the local impacts of such developments and contribute positively to those areas. At the same time, rating frameworks are designed to equitably allocate the costs of maintaining infrastructure and services across the broader district, reflecting the varied demands placed on local resources. These mechanisms operate independently of community benefit arrangements and aim to balance the needs of all residents and ratepayers.</p>

<p><b>It is acknowledged that Local Government is no longer only responsible for Rates, Rubbish and Roads, however it is also important that the Dandaragan Shire realise the value of being a highly sought after area for wind renewable energy projects and as such welcome the outside investment. It would be unfortunate that this resource and opportunity may be jeopardised due to restricting the guidelines associated with these developments.</b></p>	<p>Renewable energy projects present a valuable opportunity for economic growth and increased investment in the region. However, they are not the only source of revenue or investment in rural properties. Traditional agricultural activities, mining, and other industries also contribute significantly to the local economy. The proposed differential rating framework aims to support a fair and balanced approach that recognises the varied impacts and benefits of these different land uses. This helps ensure sustainable funding for infrastructure and services, supporting long-term regional development and community well-being.</p>
<p><b>It would be most unfair for individual ratepayers and landowners to be penalised with an increase in rates, which should be met by the proponents of these projects.</b></p>	<p>Current legislative frameworks require rates to be levied on landowners based on land use and property valuation rather than directly on project operators. The differential rating system is designed to allocate costs equitably, reflecting increased service demands and infrastructure impacts linked to specific land uses.</p>

<p><b>In reference to the Statement of Objects and Reasons for Differential Rates and Minimum Payments for the year ending 30 June 2026, it would be remiss if a point regarding the section regarding UV Renewable Energy (page 5) “The minimum rate recognizes that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council, regardless of the value of their property.” was not addressed. It should be pointed out that a rubbish collection service has not ever been available at the end of our driveway, unlike many others ratepayers in the Shire of Dandaragan. Also, we are more than happy to assist with machinery to clear debris from roads in our area, a cost to us which saves the Shire from deploying their machinery. It is acknowledged that these points may seem petty and very minor in the whole scheme of things, but please accept that we would prefer to work together as a shire of ratepayers, not against one another. As such it is not quite correct “that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council”, so perhaps this <i>Reason</i> should be deleted.</b></p>	<p>Service levels across the district can vary significantly due to factors such as population distribution, geographic spread, and the differing needs of urban, rural, and remote areas. While the minimum rate is established to ensure that all ratepayers make a fair contribution towards the maintenance and provision of shared infrastructure and essential services—such as roads, emergency services, and community facilities—it is recognised that not all services are equally accessed or required by every property.</p> <p>Many rural and remote properties may not receive certain services like kerbside rubbish collection, yet they still benefit indirectly from district-wide infrastructure and services that support the overall community. Additionally, voluntary community contributions, including efforts by residents to assist with local maintenance and support emergency services, play a vital role in sustaining the wellbeing and resilience of the district.</p> <p>The minimum rate therefore aims to strike a balance between equitable financial contribution from all ratepayers and an understanding of the practical variations in service delivery and usage. This approach helps ensure that the funding necessary for ongoing service provision and infrastructure renewal is maintained, while recognising the diverse circumstances and contributions of all community members.</p>
<p><b>We expect that a sensible and satisfactory resolution will be realised and the proposed differential rates increase be dismissed.</b></p>	<p>Decisions regarding differential rates are made through a formal process that considers community feedback, legislative requirements, and financial sustainability. The objective is to ensure that any rating framework is fair, transparent, and supports the effective delivery of services across the community. All submissions and viewpoints are carefully reviewed as part of this process.</p>

## 19. Received 08/07/2025. Content and Officer Content below:

To the CEO

Shire of Dandaragan

Re Submission to oppose the new differential rates policy

I note that the Shire of Dandaragan has held up Yandin Road as an example of the increased infrastructure use by the Yandin Wind Farm. You point out that that this road was graded every 10 weeks in 25/26 (I take this as a misprint and you possibly meant year 24/25 but in your haste to find reasons for the large rate rise you were rushed) where as before the wind farm it was graded once per year. I agree with your estimation of once per year but this was far from adequate. As for the 10 weeks, I haven't kept records, but it would surprise me. I also point out that the rates collected from farms along the Yandin road would be in my estimates be in excess of \$100,000. This would increase by over \$35000 if this new rate was to go ahead.

A little history of Yandin Road.

The heaviest use of Yandin Rd in recent years has been the cartage of road building materials for the construction of Indian Ocean Drive and Meadows Rd. This was important for the access of coastal town residents and tourists to link with each other and city. The road also had heavy use for the harvesting of pine plantations (by a not for profit organisation called Forrest Products). Prior to that the road was used for the transport of construction materials for the Dampier Gas Pipeline project. That is what it was brought up to road train standard for. The road is also servicing a tourist lookout at Yandin Hill. And as a connecting road between Brand Hwy and Dandaragan Rd it attracts use from through traffic – cars trucks machinery. Go back a little further to when a landowner asked the Shire to construct the last 2 km of the surveyed road to give he and his Dandaragan school teacher wife shorter access to town, the Shire said no, you can continue to go the long long way around. So he and I fenced it and made a road.

Dandaragan Shire Office, you picked a very bad example of an infrastructure cost caused by the Yandin Wind Farm. I feel that the Shire should engage with the windfarm directly if they want it to fund a road for everyone to use, not try to use it as a poor excuse for differential rates.

Further

I am also against the differential rate as the Dandaragan Shire seems to be deliberately keeping us in the dark as to its use. It is obviously not being used to share the rate load over all rate payers. For instance, we are told that:

24/25 rate collection. \$8,005,531

25/26 rate collection with +5% proposed increase \$8,405,808

25/26 rate collection with +5% proposed increase + proposed differential rates \$8,964,931

All this extra money – why is it required give us some figures. Not airy fairy inaccurate examples such as Yandin Rd. Tell us some figures to justify this grab if you want our approval. Not just generalisations.

Just your standard 5% increase is running at well over CPI. Don't just put up figures of standard 5% increase plus another 7% for differential rates without giving us the figures of why and what for. It makes people nervous about what might happen next year. ie take more from intensive farming. Increase differentials on renewables etc. Is the extra money to cover the cost of the Coastal Track Management Plan that seems to have cost an enormous amount by the way neighbouring shires are worried about where they will get their share of the funds to cover it. If you don't tell us, we don't know, and this leads to suspicion. Your shire notes say that currently there are \$1.08 billion that has been invested in currently operational energy projects within the shire, and an additional \$6.9 billion in various stages of planning. This is a huge increase in differential rates going forward. But it is not with the intention of keeping the pressure off the normal rate collection. My farm rates have increased by 9.47% in 23/24, 11.41% in 24/25, and a forecast of 12% in 25/26. I believe that the increases at this level are spiralling out of control and not sustainable. I plead to our elected Shire Councillors to take back the control from their employed advisors before this organisation becomes a huge monster that can not be stopped. And give us some accurate figures of intent if you want our support for the rating system. We want our money used in a program that we can clearly understand.

Dandaragan



Submission	Officer Comment
<p><b>I note that the Shire of Dandaragan has held up Yandin Road as an example of the increased infrastructure use by the Yandin Wind Farm. You point out that that this road was graded every 10 weeks in 25/26 (I take this as a misprint and you possibly meant year 24/25 but in your haste to find reasons for the large rate rise you were rushed) where as before the wind farm it was graded once per year. I agree with your estimation of once per year but this was far from adequate. As for the 10 weeks, I haven't kept records, but it would surprise me. I also point out that the rates collected from farms along the Yandin road would be in my estimates be in excess of \$100,000. This would increase by over \$35000 if this new rate was to go ahead.</b></p>	<p>It is important to note that detailed information on overall road funding and maintenance schedules is not typically published publicly, as these involve a range of variables and ongoing assessments. However, the Shire encourages ratepayers to reach out directly for property-specific information.</p> <p>Local Government rates contribute to a broad range of services beyond road maintenance, and the allocation of these funds is managed to address the varied needs across the district. Road maintenance programs take into account increased usage from developments like wind farms, as well as broader community needs and resource availability. While individual experiences of grading frequency may differ, efforts are made to ensure infrastructure is maintained effectively and fairly across the district.</p>
<p><b>A little history of Yandin Road.</b></p> <p><b>The heaviest use of Yandin Rd in recent years has been the cartage of road building materials for the construction of Indian Ocean Drive and Meadows Rd. This was important for the access of coastal town residents and tourists to link with each other and city. The road also had heavy use for the harvesting of pine plantations (by a not for profit organisation called Forrest Products). Prior to that the road was used for the transport of construction materials for the Dampier Gas Pipeline project. That is what it was brought up to road train standard for. The road is also servicing a tourist lookout at Yandin Hill. And as a connecting road between Brand Hwy and Dandaragan Rd it attracts use from through traffic – cars trucks machinery. Go back a little further to when a landowner asked the Shire to construct the last 2 km of the surveyed road to give he and his Dandaragan school teacher wife shorter access to town, the Shire said no, you can continue to go the long long way around. So he and I fenced it and made a road.</b></p>	<p>The history of Yandin Road demonstrates its varied and significant uses over the years, including supporting major infrastructure projects and serving local residents and tourism. The road has evolved to meet changing community and regional needs, accommodating diverse traffic such as heavy vehicles, through traffic, and local access. While many requests for road improvements are made to local authorities, not all can be actioned due to resource constraints. This context highlights the challenges in managing and maintaining infrastructure that serves multiple purposes effectively within available means.</p>

<p><b>Dandaragan Shire Office, you picked a very bad example of an infrastructure cost caused by the Yandin Wind Farm. I feel that the Shire should engage with the windfarm directly if they want it to fund a road for everyone to use, not try to use it as a poor excuse for differential rates</b></p>	<p>Infrastructure impacts from large-scale developments such as wind farms are assessed alongside other factors when considering rating frameworks. While direct engagement with project operators is a valid approach and may occur in some instances, differential rating provides a formal and legislated mechanism to reflect land use impacts on local services and infrastructure. Roads like Yandin Road are used by a wide range of vehicles beyond those associated with the wind farm, and funding for their maintenance is shared across the broader rate base to ensure equity and long-term asset management.</p>
<p><b>Further</b>  <b>I am also against the differential rate as the Dandaragan Shire seems to be deliberately keeping us in the dark as to its use. It is obviously not being used to share the rate load over all rate payers. For instance, we are told that:</b>  <b>24/25 rate collection.\$8,005,531</b>  <b>25/26 rate collection with +5% proposed increase \$8,405,808</b>  <b>25/26 rate collection with +5% proposed increase + proposed differential rates \$8,964,931</b>  <b>All this extra money – why is it required give us some figures. Not airy fairy inaccurate examples such as Yandin Rd. Tell us some figures to justify this grab if you want our approval. Not just generalisations.</b></p>	<p>The proposed differential rates aim to ensure that the rating system reflects the scale and impact of different land uses. Properties associated with activities like renewable energy or mining can generate increased demand on infrastructure, services, and administration, costs that need to be accounted for in a fair and sustainable way. The projected increase in total rate revenue between 2024/25 and 2025/26 supports road maintenance, asset renewal, emergency services, compliance, and long-term financial sustainability. These are real cost pressures that affect all ratepayers, not limited to one project or locality. Specific financial allocations will be detailed in the formal budget papers. The Yandin Road example was used to illustrate one of many infrastructure impacts, not as the sole justification for the proposed rating structure.</p>

**Just your standard 5% increase is running at well over CPI. Don't just put up figures of standard 5% increase plus another 7% for differential rates without giving us the figures of why and what for. It makes people nervous about what might happen next year. ie take more from intensive farming. Increase differentials on renewables etc. Is the extra money to cover the cost of the Coastal Track Management Plan that seems to have cost an enormous amount by the way neighbouring shires are worried about where they will get there share of the funds to cover it. If you don't tell us, we don't know, and this leads to suspicion. Your shire notes say that currently there are \$1.08 billion that has been invested in currently operational energy projects within the shire, and an additional \$6.9 billion in various stages of planning. This is a huge increase in differential rates going forward. But it is not with the intention of keeping the pressure off the normal rate collection. My farm rates have increased by 9.47% in 23/24, 11.41% in 24/25, and a forecast of 12% in 25/26. I believe that the increases at this level are spiralling out of control and not sustainable. I plead to our elected Shire Councillors to take back the control from their employed advisors before this organisation becomes a huge monster that can not be stopped. And give us some accurate figures of intent if you want our support for the rating system. We want our money used in a program that we can clearly understand.**

The concerns around rate increases and financial transparency are understood. The general rate increase proposed for 2025/26 reflects rising service delivery costs across the region, driven by inflation, asset renewal needs, and increased demand on infrastructure and compliance. These pressures affect the Shire's ability to maintain essential services, not just in coastal areas, but across the whole district, including rural and inland communities. Differential rates are not intended to shift the burden unfairly onto any one group but to recognise where certain land uses, such as intensive agriculture or renewable energy, have a different scale of service impact or administrative complexity. The objective is to ensure equity and sustainability across all sectors. Your concerns about long-term predictability are valid. While future rating decisions will depend on evolving cost pressures and development trends, they will continue to be subject to public consultation, Ministerial approval (for differentials), and Council debate. The Shire does not have access to revenue from renewable energy investment totals directly, and rates remain one of the only revenue tools available to local governments under current legislation. More detailed financial information, including how rates are allocated across services and projects, will be provided through the annual budget documents.

20. Campbell Hurst. Received on 08/07/2025. Content and Officer Comment below:

Campbell Hurst

Submission to the proposed introduction of differential ratings

I am writing today to show my concern over the new proposed differential rating. While I do agree with the need to increase funding to meet the Shire's capacity to meet and deliver services, maintenance and capital works, I do not believe this is a well targeted approach and lacks objectivity, fairness and consistency across the shire.

I do not like the position it puts land owners in to have to negotiate the differential rates with the external organisations to try and recoup funds. This may leave people and businesses with out-of-pocket expenses for lengthy times and may not even be able to be recoup in deals that have been done in the past.

While I acknowledge surrounding shires rates vary a lot to match their budgeting requirements, the charge rate of 0.1000 seems unfair and inconsistent with the rest of the rate charges. 0.1000 increase from 0.004227 is a 23.6 times increase. I feel it unfairly treats Iluka, Tronnox and Image Resources and makes them do all the 'heavy lifting' while the renewables have seemed to get off lightly compared to their counterparts

I also question the accuracy of the projected revenue increase (copied in below) provided by the rate differential. I can only estimate on what UV (unimproved values) have been used, but knowing my property at 9967 Brand Highway Dandaragan, if it were to be put under the mining UV rate would incur a \$340 000 rate increase from the current \$13 000. Iluka Resources own 3 titles to the north of us and would be looking at shire rates of exceeding \$ 1 000 000 a year, that does not seem fair or consistent with me.

1. **Mining** is proposed to change from 0.42 cents in the dollar to 10 cents in the dollar – this will raise an additional **\$459k** for the financial year (going from income of \$66k to \$525k)
2. **Renewable** is proposed to change from 0.42 cents in the dollar to 0.50 cents in the dollar – this will raise an additional **\$75k** for the financial year (going from income of \$187k to \$262k)
3. The budget is not set, but the additional \$534k is earmarked for infrastructure renewal and development. There are many important projects that the Shire is proposing and of interest to your particular group we have proposed a 1.88km reconstruction reseal of Dandaragan Road, new changeroom for the Dandaragan recreation centre, electrical capacity upgrade to Dandaragan Transit Park and many more projects. These projects are all subject to councillor approval and the differential rating is all subject to Ministerial approval.

While landowners can choose to not be involved with renewable energy projects, do they really have a choice? When the projects are to go ahead with or without you, do you fight them or join them? When it comes to mining, the mining tenements are granted by the State Government and the landowner cannot deny access to the Crown's resources.

I acknowledge that these significant projects have additional costs, complexities and issues to them for the Shire, however the time to recoup and charge these projects is at the planning and approval stage. The Shire cannot act as a taxation department to meet budget needs, and should not be relying on the landowners to negotiate a form of taxation through Shire rates.

If the funding requirements are needed for capital works around the town sites, this really needs to come from increased GRV and UV rates, and not targeted towards certain businesses and projects. If the specific capital expenditure needed for road construction and maintenance, directly talk and negotiate with the causing and affected parties.

Kind regards

Campbell Hurst

Submission	Officer Comment
<p><b>I do agree with the need to increase funding to meet the Shire's capacity to meet and deliver services, maintenance and capital works, I do not believe this is a well targeted approach and lacks objectivity, fairness and consistency across the shire.</b></p>	<p>The introduction of differential rating is aimed at improving fairness and alignment between land use impacts and contribution levels. It recognises that certain industries place a greater demand on public infrastructure and services and ensures that contributions are proportional to the level of impact and benefit derived.</p>
<p><b>I do not like the position it puts landowners in to have to negotiate the differential rates with the external organisations to try and recoup funds. This may leave people and businesses with out-of-pocket expenses for lengthy times and may not even be able to be recoup in deals that have been done in the past.</b></p>	<p>It is acknowledged that differential rating may create complexities for landowners with existing commercial arrangements. However, the obligation to pay rates lies with the landowner under the Local Government Act 1995 and the Shire does not have the legislative power to alter this.</p>
<p><b>While I acknowledge surrounding shires rates vary a lot to match there budgeting requirements, the charge rate of 0.1000 seems unfair and inconsistent with the rest of the rate charges. 0.1000 increase from 0.004227 is a 23.6 times increase. I feel it unfairly treats Iluka, Tronox and Image Resources and makes them do all the 'heavy lifting' while the renewables have seemed to get off lightly compared to their counterparts.</b></p>	<p>The proposed UV Mining rate reflects a reassessment of contributions based on land use intensity and lifecycle impact on local infrastructure. It has remained unchanged for many years despite the increasing footprint of mining activity. The proposed rates for mines bring the Shire of Dandaragan in line with neighbouring Shires with similar mining operations.</p>

<p><b>I also question the accuracy of the projected revenue increase (copied in below) provided by the rate differential. I can only estimate on what UV (unimproved values) have been used, but knowing my property at 9967 Brand Highway Dandaragan, if it were to be put under the mining UV rate would incur a \$340 000 rate increase from the current \$13 000. Iluka Resources own 3 titles to the north of us and would be looking at shire rates of exceeding \$ 1 000 000 a year, that does not seem fair or consistent with me.</b></p>	<p>The UVs used in the modelling are based on current Landgate valuations for assessments proposed to be moved to the UV Mining category. The property at 9967 Brand Highway is not proposed to be rated under the Mining category as there is an active mining tenement over the subject land which is separately rated. Only a small number of assessments that are part of approved or operating mining activities are included. It is unclear how the respondent has calculated their estimate, however the Shire can confirm that the estimation is substantially more than the proposed rates when applying the rate in the dollar for mining against these assessments valuations.</p>
<p><b>While landowners can choose to not be involved with renewable energy projects, do they really have a choice? When the projects are to go ahead with or without you, do you fight them or join them? When it comes to mining, the mining tenements are granted by the State Government and the landowner cannot deny access to the Crown's resources.</b></p>	<p>The Shire recognises that participation in such projects is not always fully voluntary, particularly in the case of mining tenements granted under State legislation. However, the rating approach is based on land use type and industry activity rather than the status of consent. The aim is to ensure appropriate contributions from industrial operations, regardless of landowner control.</p>
<p><b>I acknowledge that these significant projects have additional costs, complexities and issues to them for the Shire, however the time to recoup and charge these projects is at the planning and approval stage. The Shire cannot act as a taxation department to meet budget needs, and should not be relying on the landowners to negotiate a form of taxation through Shire rates.</b></p>	<p>The Shire agrees that developer contributions during planning and approvals are important. However, these mechanisms are limited to once-off costs and cannot address ongoing operational and maintenance, or local government business requirements. Local government rating is not a tax but a legislated mechanism for funding community services and infrastructure. Differential rating complements the planning system by providing sustainable, annual revenue from high-impact land uses.</p>

**If the funding requirements are needed for capital works around the town sites, this really needs to come from increased GRV and UV rates, and not targeted towards certain businesses and projects. If the specific capital expenditure needed for road construction and maintenance, directly talk and negotiate with the causing and affected parties.**

This approach has been considered; however, broad increases in GRV and UV categories would disproportionately affect residential and farming ratepayers. Council's proposal has been developed on the basis that industries generating higher use and impact should contribute accordingly.

## 21. Iluka Resources – Received 08/07/2025



8 July 2025

Mr Brent Bailey  
Chief Executive Officer  
Shire of Dandaragan  
PO Box 676  
Jurien Bay WA 6516

By Email: [council@dandaragan.wa.gov.au](mailto:council@dandaragan.wa.gov.au)

**CONFIDENTIAL**

Dear Mr Bailey

### Objection to proposed differential rates for 2025–2026

I refer to the Shire of Dandaragan's Notice of Intention to Impose Differential Rates.

Iluka is alarmed by the proposed differential rates for the 2025–2026 financial year, specifically the UV Mining category, which is proposed at a Rate in the Dollar (RID) of 10.0000 cents. This represents an increase in excess of 2000%, demonstrably unreasonable and unjustified, to which the company objects in the strongest terms.

As you know, Iluka mines rare earths, titanium and zircon at the Cataby mine. We then process all of these critical minerals domestically – operations that are increasingly marginal given current market conditions and broader geopolitical factors.

The proposed increase to the UV Mining rate is manifestly disproportionate and excessive. It is not consistent with the Key Values contained within the Differential Rate Rating Policy in respect to section 6.33 of the *Local Government Act 1995*. If implemented, it would be a significant impost on Iluka's operations in the Shire and constitute a considerable disincentive for diversified economic growth, including future critical minerals developments.

The Shire's notice states the reason for the increase to the UV Mining rate is because "[mining properties] are heavy users of the Shire's infrastructure and contribute to its deterioration at a far higher level than other properties." This is the only reason stated. The Shire has not provided any supporting information to explain how it has assessed the use of Shire infrastructure by mining category proponents and how that compares to the use by other categories.

I further note that Iluka's Cataby operations currently have a workforce of ~350 people and are a major contributor to the local economy.

The proposed increase for UV Mining is significantly higher than any other rating category, including UV Renewable Energy of 0.50 cents and UV General of 0.37 cents. The Shire's notice does not provide any objective information to justify the proposed significant increase, nor does it explain how the Shire has determined that mining should pay substantially higher rates than any other category.

There is no indication that the cost of the Shire's infrastructure, services and amenities used in connection with mining activities has increased to warrant such a significant increase.

Iluka therefore requests the Shire does not proceed with the proposed increase to the UV Mining rate.

Should the Shire decide to progress with a review and adjustment to the UV Mining rate amount, Iluka's position is that the Shire:

- must ensure that any adjustment to the UV Mining rate is fair, equitable and consistent when compared to other rating categories;
- provides a detailed justification for any proposed rate increase, including through the provision of objective information as to how any increase is fairly supported in reference to the purported heavy use of Shire infrastructure by mining property proponents compared to other rating categories;
- provides detail on how the UV Mining rate will be applied in practice, for example
  - how it will be applied to parcels of land that have mixed land use – there are situations in the Shire where there is a combination of agricultural, mining and renewable energy activities occurring on a single parcel of land; and
  - the timeframe during which, or the activities that would attract, the application of the UV Mining rate. For instance, if it would apply only while substantive commercial-scale mining activities are being conducted, or if it would apply at other times such as during exploration, construction and rehabilitation phases associated with mine developments.

Iluka remains committed to working collaboratively with the Shire to deliver sustainable outcomes. Our Cataby Operations Manager, Marc Andrews and Land and Tenement Manager, Mark Alchin, will participate at the Shire's Special Meeting on 9 July 2025. Please contact Mr Alchin directly should wish to discuss this matter beforehand or subsequently (m: 0457 468 837; e: [mark.alchin@iluka.com](mailto:mark.alchin@iluka.com)).

Yours sincerely

A handwritten signature in black ink, appearing to read "Ben Martin".

Ben Martin  
GENERAL COUNSEL & COMPANY SECRETARY



Submission	Officer Response
<p><b>"Iluka is alarmed by the proposed differential rates for the 2025–2026 financial year, specifically the UV Mining category, which is proposed at a Rate in the Dollar (RID) of 10.0000 cents. This represents an increase in excess of 2000%, demonstrably unreasonable and unjustified, to which the company objects in the strongest terms."</b></p>	<p>The proposed rate increase reflects the Shire's reassessment of the contribution mining operators make to infrastructure demands, service consumption, and administrative complexity. The previous rate for UV Mining had not been reviewed for several years and was significantly lower than comparable local governments some of which Iluka has operations in. The proposed 10.0000 cents reflects a move toward equity with other operations of significant commercial or industrial scale and remains subject to Ministerial approval.</p>
<p><b>"The proposed increase to the UV Mining rate is manifestly disproportionate and excessive. It is not consistent with the Key Values contained within the Differential Rate Rating Policy in respect to section 6.33 of the Local Government Act 1995. If implemented, it would be a significant impost on Iluka's operations in the Shire and constitute a considerable disincentive for diversified economic growth, including future critical minerals developments."</b></p>	<p>Council has endorsed the proposed rating model for public input taking into consideration is consistency with the principles of section 6.33, particularly in regard to fairness and the capacity to pay. The mining category is distinguished by the scale and intensity of land use, its reliance on infrastructure throughout the district, and the lifecycle costs imposed on the broader community. Council acknowledges the importance of the mining sector to local and regional development and will consider all submissions before determining its final recommendation.</p>
<p><b>"The Shire's notice states the reason for the increase to the UV Mining rate is because '[mining properties] are heavy users of the Shire's infrastructure and contribute to its deterioration at a far higher level than other properties.' This is the only reason stated. The Shire has not provided any supporting information to explain how it has assessed the use of Shire infrastructure by mining category proponents and how that compares to the use by other categories."</b></p>	<p>The Shire acknowledges the need to provide further clarity and transparency. Mining operations and the associated workforce movements involve frequent utilisation of local infrastructure, requiring substantial ongoing investment in maintenance and renewal. Comparative assessments with other sectors (e.g. renewable energy, agriculture) show lower frequencies and impact levels.</p>

<p><b>"I further note that Iluka's Cataby operations currently have a workforce of ~350 people and are a major contributor to the local economy."</b></p>	<p>The Shire recognises and values Iluka's local presence, employment contribution, and broader economic role. This contribution is appreciated and taken into account as part of the overall policy context. The differential rate proposal is not intended to diminish this relationship, but rather to ensure that all sectors contribute appropriately to the cost of public infrastructure, services and making a equitable contribution to the broader facilities which are utilised by the workforce.</p>
<p><b>"The proposed increase for UV Mining is significantly higher than any other rating category, including UV Renewable Energy of 0.50 cents and UV General of 0.37 cents. The Shire's notice does not provide any objective information to justify the proposed significant increase, nor does it explain how the Shire has determined that mining should pay substantially higher rates than any other category."</b></p>	<p>The UV Mining rate reflects the relative operational intensity, traffic volumes, and lifespan of mining activities compared to other land uses. A materially higher mining rate is common throughout Western Australian local governments recognising that the scale of such industry has a role to play in overall community costs. The General UV category reflects standard agricultural or rural land, which does not impose the same service burden or intensity of land use.</p>
<p><b>"There is no indication that the cost of the Shire's infrastructure, services and amenities used in connection with mining activities has increased to warrant such a significant increase."</b></p>	<p>The Shire has faced compounding increases in road maintenance costs, drainage impacts, administrative workload, and community expectations tied to the presence of large-scale mining operations. These costs are not always tied to specific projects, but to ongoing lifecycle pressures. The proposed differential rate is intended to align annual revenue with long-term asset management obligations.</p>

## 22. Received 8<sup>th</sup> July 2025

### Proposed Differential Rate Strategy



 Follow up. Start by Tuesday, 8 July 2025. Due by Tuesday, 8 July 2025.

 Reply  Reply All  Forward 

Tue 8/07/2025 10:53 AM

Caution! This message was sent from outside your organization.

Good morning,

I am making this submission as a property owner whose farm is in the process of having a wind farm development.

Firstly I feel very concerned that the shire is in the process of making some decisions on increasing differential rate's depending on our land use .

I don't understand why the rates are changing and we the landholders have to pay higher rates.

This proposed levy should be negotiated between the wind farm operator and the shire .

Regards,



Submission	Officer Response
<p><b>Firstly I feel very concerned that the shire is in the process of making some decisions on increasing differential rate's depending on our land use.</b></p>	<p>Differential rating is a provision under the <i>Local Government Act 1995</i> that allows rates to be varied based on land use and activity type. This mechanism is used to ensure that those land uses with a higher impact on infrastructure and service demand contribute proportionally to the cost of providing those services.</p>
<p><b>I don't understand why the rates are changing and we the landholders have to pay higher rates.</b></p>	<p>The changes are proposed to address the growing infrastructure and service demands placed on the Shire by large-scale industrial developments such as mining and wind farms. The increased rate is aimed at the land use associated with renewable energy projects, not traditional farming operations.</p>
<p><b>This proposed levy should be negotiated between the wind farm operator and the shire.</b></p>	<p>Within the bounds of the Local Government Act 1995, local governments must levy rates on landowners, not project operators. The Shire is not permitted to levy rates directly on third parties such as wind farm operators. Nonetheless, landowners may be in a position to negotiate future agreements with operators that reflect the potential for higher rates due to land use changes.</p>

## 23. Anna Roberts – Received 08/07/2025

### Differential rate increase Submission



Anna Roberts <yandan@westnet.com.au>

To ○ Records & Faxes; ● Brent Bailey

You replied to this message on 8/07/2025 11:03 AM.

Reply Reply All Forward

Tue 8/07/2025 10:58 AM

Caution! This message was sent from outside your organization.

To Whom it may concern

We are truly baffled by this proposed differential rate increase and how it is going to affect us.

We write to express our concern and our strong opposition to the proposed rate increase.

It was only through word of mouth that we were made aware of this farce and an email from the Dandaragan Shire CEO acknowledging there had been an oversight.

This form of management is not consistent with your shire values of accountability, transparency and objectivity. We suggested the submission date was extended to no avail. As of 15minutes ago we have been made aware of other landowners who will be affected and have had ZERO communication from the shire.

Your reasoning for renewable and mining increase is preposterous. You were asleep at the wheel when Yandin Wind farm was built when the damage to local roads was done and you had an opportunity to have Yandin Rd sealed.

The main damage now is to us, the landholder with their freeway like roads running through our farms, with loss of land use. These roads DO NOT affect shire infrastructure

Mining, DOES NOT damage local infrastructure as all heavy vehicles are on PRIVATE property.

The mining camps do not depend on the shire for sewerage removal or rubbish removal and the light traffic on Cataby Road cannot be used as a reason for infrastructure damage, especially given a bus service is offered.

You are going to destroy the community relationship that has been built up by the landowners and the companies and potentially compromising future community funding.

Who is expected to pay the rate increase and based on what. What method has been used to calculate the increase.

We signed confidential agreements so unless there has been a breach of our contracts, then you have ZERO idea whether we are better or worse off.

We have spent countless hours, days and weeks negotiating with these companies. Hours of productivity gone. I have watched my husband grow "old and grey" with the pressures of dealing with companies who don't have an understanding of farm practices.

If the landowner is expected to pick up the rate rise then our farming futures will be destroyed.

We currently farm for the future, our children are invested but you risk us having to sell out to big corporations.

If your revenue greed is aimed at the companies, then please find a way to negotiate with them directly.

It was extremely disappointing to learn as of 3.45 last Sunday, illuka had not been made aware of this proposal either.

In summary, we are extremely disappointed with the conduct of the shire and vehemently oppose your differential rate increase.

PLEASE ACKNOWLEDGE THIS SUBMISSION HAS BEEN RECEIVED

Hugh and Anna Roberts

Yandan Grazing Company  
Dandaragan

Submission	Officer Response
<b>We write to express our concern and our strong opposition to the proposed rate increase.</b>	The opposition is noted and will be included in the consultation report for Council consideration.
<b>It was only through word of mouth that we were made aware of this farce and an email from the Dandaragan Shire CEO acknowledging there had been an oversight.</b>	The Shire administration regrets that there was a breakdown in the initial mailout. Acknowledging the oversight, corrective steps were taken including direct correspondence, additional public notices and liaison between staff and ratepayers with enquiries.
<b>This form of management is not consistent with your shire values of accountability, transparency and objectivity.</b>	
<b>We suggested the submission date was extended to no avail.</b>	The submission period was set in line with statutory requirements. While extensions can be considered at the decision of Council, they must also align with budget and Ministerial approval timelines.
<b>As of 15 minutes ago we have been made aware of other landowners who will be affected and have had ZERO communication from the shire.</b>	The Shire has issued direct letters to all ratepayers identified as being affected by the proposed reclassification, the Shire has also published notices in the West Australian, local libraries, website and social media to garner broad public input.
<b>Your reasoning for renewable and mining increase is preposterous. You were asleep at the wheel when Yandin Wind farm was built when the damage to local roads was done and you had an opportunity to have Yandin Rd sealed.</b>	The impact on the local infrastructure network and community of the Yandin Wind farm is acknowledged and lessons from that development have informed the current approach, which includes increased cost recovery through differential rating and an expanded suite of development approval conditions to reduce the impact of projects at such scale. The intent is to ensure future projects make a fair contribution over time, not just at construction.

<p><b>The main damage now is to us, the landholder with their freeway like roads running through our farms, with loss of land use. These roads DO NOT affect shire infrastructure.</b></p>	<p>It is acknowledged that wind farm infrastructure on private land can have significant impacts on land use and farming practices. However, the differential rating applies to assessments associated with the commercial renewable use, not agricultural use. Roads constructed by wind farm developers on private land are not considered Shire assets, and the rating approach is targeted at the broader operational footprint.</p>
<p><b>Mining, DOES NOT damage local infrastructure as all heavy vehicles are on PRIVATE property.</b></p>	<p>While some vehicle movements are confined to private land, the overall lifecycle of a mining project does impose demands on public infrastructure including roads, planning, and administrative services. The differential rating is not based on specific truck movements alone, but on cumulative land use intensity, scale, capacity to pay and service impact.</p>
<p><b>The mining camps do not depend on the shire for sewerage removal or rubbish removal and the light traffic on Cataby Road cannot be used as a reason for infrastructure damage, especially given a bus service is offered.</b></p>	<p>It is acknowledged that some mining camps can operate self-sufficiently in areas such as waste and wastewater. However, they still rely on regional infrastructure, place demands on administration and planning, and influence the Shire's asset management obligations. These cumulative effects inform the rationale for the proposed differential rates applied to the mining category.</p>
<p><b>You are going to destroy the community relationship that has been built up by the landowners and the companies and potentially compromising future community funding.</b></p>	<p>The intent of the differential rate is not to disrupt those relationships, but to ensure local governments can sustainably maintain and improve the infrastructure that underpins development and community needs.</p>
<p><b>Who is expected to pay the rate increase and based on what. What method has been used to calculate the increase.</b></p>	<p>The landowner is responsible for paying rates, as required under the <i>Local Government Act 1995</i>. The method of calculation involves applying the proposed rate in the dollar to the property's Unimproved Value (UV), as determined by Landgate. Properties are assigned a rating category based on aligned land use to the Shire's differential rates categories. Only assessments meeting defined criteria for the Renewable Energy or Mining category would be reclassified.</p>

<b>We signed confidential agreements so unless there has been a breach of our contracts, then you have ZERO idea whether we are better or worse off.</b>	The Shire does not have access to commercial terms between landowners and proponents and does not make assumptions about individual profitability.
<b>We have spent countless hours, days and weeks negotiating with these companies. Hours of productivity gone. I have watched my husband grow “old and grey” with the pressures of dealing with companies who don’t have an understanding of farm practices.</b>	Staff acknowledge the significant time and emotional burden carried by landowners in negotiating with large corporations. The proposed rating framework is not a reflection of the individual landholder’s effort or reward, but a recognition of the land’s functional use and service impact once developed.
<b>If the landowner is expected to pick up the rate rise then our farming futures will be destroyed.</b>	The comment is noted and tabled for Council consideration.
<b>We currently farm for the future, our children are invested but you risk us having to sell out to big corporations.</b>	The comment is noted and tabled for Council consideration. The intent of the differential rating strategy is not to shift the burden to family farms, but to ensure commercial-scale projects contribute fairly to the community infrastructure that supports them.
<b>If your revenue greed is aimed at the companies, then please find a way to negotiate with them directly.</b>	Under legislation, rates must be levied on landowners—not third-party operators. The Shire cannot legally enter direct rating agreements with project proponents. However, the Shire has been actively advocating for a legislative review and financial contributions from renewable energy companies.
<b>It was extremely disappointing to learn as of 3.45 last Sunday, Illuka had not been made aware of this proposal either.</b>	The Shire has directly notified affected companies and landholders based on assessment records. The Shire has received a submission from the mentioned company.
<b>In summary, we are extremely disappointed with the conduct of the shire and vehemently oppose your differential rate increase.</b>	The comment is noted and tabled for Council consideration.



## 24. Received 08/07/2025

Differential rates submission



Flag for follow up.

Reply Reply All Forward

Tue 8/07/2025 12:20 PM

Caution! This message was sent from outside your organization.

Shire differential rates submission

I am writing as a rate payer with land that will be affected under the proposed differential rate scheme. A portion of our property has wind turbines from the Yandin Wind Farm on it.

Firstly I don't agree at all with this proposal and it's obviously nothing more than a money grab from a shire that can't live within its means. Cutting costs would be far more appropriate than constantly putting your hands in the pockets of productive people. This comment is also angled at the ~9% rate rise we copped last year, when the early payment discount being taken away is accounted for. A little knowledge of history would prove that again and again, socialists always end up running out of other peoples money. Forever increasing the governments cut out of the private sector is not the way to bring prosperity to the majority of us.

If the shire must increase its take from these companies, they should absolutely go directly to them rather than add to administrative burden of the land holder. As a farmer we are already being strangled in red tape and paperwork from all forms of government and to add to this is grossly unfair. This time is already being stolen from us which should be spent running our businesses and with our family- not filling in forms for the government. I would have thought a local government would have more empathy for people within its community but this comes across as people that have a level of contempt for us.

The argument that this rate rise is justified because these companies are damaging the roads is laughable. With construction complete there only a small amount of light vehicles coming in.

My concern is also that the extra rate take could mean these companies reduce their donations given locally. This would mean more money flowing to the coastal areas unaffected by their presence.

Regards



Submission	Officer Response
<p><b>Firstly I don't agree at all with this proposal and it's obviously nothing more than a money grab from a shire that can't live within its means. Cutting costs would be far more appropriate than constantly putting your hands in the pockets of productive people.</b></p>	<p>Like many local governments, the Shire faces increasing asset renewal, compliance, and service delivery obligations. Differential rating allows Council to balance revenue needs more equitably, ensuring high-impact industrial land uses contribute proportionally while keeping general farming and residential increases to a minimum. Council's annual oversight of the budget includes expenditure controls and prioritisation of projects.</p>
<p><b>This comment is also angled at the ~9% rate rise we copped last year, when the early payment discount being taken away is accounted for.</b></p>	<p>The removal of the early payment discount was part of a broader financial reform approved by Council to simplify the rating system and improve fairness for all ratepayers.</p>
<p><b>A little knowledge of history would prove that again and again, socialists always end up running out of other peoples money. Forever increasing the governments cut out of the private sector is not the way to bring prosperity to the majority of us.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>If the shire must increase its take from these companies, they should absolutely go directly to them rather than add to administrative burden of the land holder.</b></p>	<p>Under the <i>Local Government Act 1995</i>, rates must be levied on landowners, not third-party project operators. Land owners may be able to negotiate recovery mechanisms into their agreements.</p>
<p><b>As a farmer we are already being strangled in red tape and paperwork from all forms of government and to add to this is grossly unfair. This time is already being stolen from us which should be spent running our businesses and with our family - not filling in forms for the government.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>I would have thought a local government would have more empathy for people within its community but this comes across as people that have a level of contempt for us.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>

## 25. Image Resource – Received 08/07/2025



7 July 2025

Shire of Dandaragan  
69 Bashford Street  
Jurien Bay WA 6516

Dear Mr Bailey

### Proposed Introduction of Differential Rating

Image Resources has significant concerns regarding the proposed introduction of differential rating in the Shire of Dandaragan. Under the proposed changes, Image Resources' rate burden will increase from approximately \$10,500 in the 2024-25 rate year to approximately \$70,700 in the 2025-26 rate year. Image Resources believes that the scale of the increase (670%) and the lack of notice (less than one month) is completely unreasonable and urges the Shire to reconsider.

As a publicly listed company, Image Resources operates on an annual budget approved by the board of directors. Therefore, Image Resources would appreciate a notice period for such a significant rate increase sufficient to allow for the additional expense to be budgeted for in the upcoming financial year.

Image Resources is a small, locally based mining company with limited financial resources. The company is still recovering from the significant unplanned negative financial impact of the delays in approvals for its current mining operation at Atlas. The almost seven-fold increase in rates seems excessive. While Image Resources appreciates that the current cost crisis gripping Australia affects everyone, including local governments, it questions the fairness of placing such a large amount of the budget burden onto a handful of mining and exploration companies.

Image Resources contributes to the Dandaragan Shire in many ways, including employment of locals at the Atlas mine site, investment in local infrastructure such as roads, spending money with local businesses, and direct financial support of community events such as the Cervantes Art Festival, the Jurien Bay Easter Festival, and the Turquoise Coast Festival. If the proposed rate increases go ahead as planned, Image Resources will not be able to guarantee any of the discretionary community support going forward and will be forced to take a more pragmatic approach when making supply and logistics decisions.

I am happy to meet and discuss Image's concerns in more detail. Feel free to contact me personally at [daddison@imageres.com.au](mailto:daddison@imageres.com.au).

Yours sincerely,

Damien Addison  
Exploration Manager  
Image Resources NL

Submission	Officer Response
<p><b>Under the proposed changes, Image Resources' rate burden will increase from approximately \$10,500 in the 2024-25 rate year to approximately \$70,700 in the 2025-26 rate year.</b></p>	<p>The proposed increase reflects a reassignment of the assessment to the UV Mining category, based on land use and operational scale. The new rate in the dollar seeks to bring mining in line with other high-impact industrial uses and local governments throughout Western Australia. However, it is acknowledged that this is a substantial change, and all submissions—including this example—will inform Council's final recommendation.</p>
<p><b>Image Resources believes that the scale of the increase (670%) and the lack of notice (less than one month) is completely unreasonable and urges the Shire to reconsider.</b></p>	<p>The Shire public consultation period has been undertaken in accordance with relevant guidelines but and appreciates that this can be difficult for businesses with fixed annual budgets. The magnitude of the increase is a result of historically low rates applied to mining properties, which are being reassessed to reflect actual service demands and infrastructure impacts.</p>
<p><b>As a publicly listed company, Image Resources operates on an annual budget approved by the board of directors. Therefore, Image Resources would appreciate a notice period for such a significant rate increase sufficient to allow for the additional expense to be budgeted for in the upcoming financial year.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>Image Resources is a small, locally based mining company with limited financial resources. The company is still recovering from the significant unplanned negative financial impact of the delays in approvals for its current mining operation at Atlas.</b></p>	<p>The challenges faced by Image Resources are noted and tabled for Council consideration. The differential rating approach does not target individual company circumstances but is based on land use classification and contribution to infrastructure and service needs at an industry level.</p>

<p><b>The almost seven-fold increase in rates seems excessive. While Image Resources appreciates that the current cost crisis gripping Australia affects everyone, including local governments, it questions the fairness of placing such a large amount of the budget burden onto a handful of mining and exploration companies.</b></p>	<p>The Shire has sought to maintain low rate increases for the majority of residential and farming ratepayers. The proposed differential rates are intended to better reflect the intensity of infrastructure use by large-scale industrial operations. The scale of the rate bill mentioned by the respondent is also comparable to a number of commercial GRV rated entities within townsites. The comment relating to fairness is noted and tabled for Council consideration.</p>
<p><b>Image Resources contributes to the Dandaragan Shire in many ways, including employment of locals at the Atlas mine site, investment in local infrastructure such as roads, spending money with local businesses, and direct financial support of community events such as the Cervantes Art Festival, the Jurien Bay Easter Festival, and the Turquoise Coast Festival.</b></p>	<p>Image Resources' economic and community contributions are recognised for their value to the region. These contributions are not taken for granted and are acknowledged separately from statutory rate revenue. The Shire does not seek to discourage ongoing involvement with the local community and hopes such relationships continue.</p>
<p><b>If the proposed rate increases go ahead as planned, Image Resources will not be able to guarantee any of the discretionary community support going forward and will be forced to take a more pragmatic approach when making supply and logistics decisions.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>

## 26. Tronox Management Pty Ltd – Received 08/07/2025



8 July 2025

Brent Bailey  
Chief Executive Officer, Shire of Dandaragan,  
PO Box 676, Jurien Bay, WA, 6516  
By email: council@dandaragan.wa.gov.au

Dear Mr. Bailey,

### Differential Rate Submission

I refer to your letter received on 19 June 2025 inviting a written submission from Tronox Management Pty Ltd (**Tronox**) on the Shire's proposal to introduce a system of Differential Rates for the 2025/26 financial year. Thank you for that opportunity.

Tronox strongly objects to the proposal for the reasons set out in this letter.

### Background

Tronox holds sixteen exploration and mining leases within the Shire of Dandaragan. These leases were granted between 1989 and 2020 and cover approximately 37,743 ha. Tronox also operates the Cooljarloo Mine within that footprint and clean up work at the historic Jurien mine site is also ongoing. Exploration work is carried out on Tronox's exploration tenements as part of our expenditure commitment with the Department of Mines, Petroleum and Exploration (DMPE).

Since 2021, Tronox has paid approximately \$78,500 in the form of Shire Rates. This includes \$16,839 for the period 2024/2025. Tronox is also a party to a Road User Agreement with the Shire, under which it has contributed \$73,815 since 2024 towards the maintenance of roads used by Tronox for the transport of ore.



In addition, Tronox is a major contributor to the Shire in other ways, being a major employer of persons in the Shire, a principal to multiple contractors and service providers in the area and the supporter of multiple community and educational groups through its community engagement initiatives.

### Mining Rates are excessive and not justified

The Shire of Dandaragan is proposing an increase to the UV Mining Rate from 0.4227 to 10.0000, more than 20 times the current rate. At the proposed increase, the cost for 2025/2026 rates would be approximately \$296,000, a significant increase.

It is Tronox's position that the proposed differential rates are excessive and not justified, and in conflict with the Key Values contained within the Rating Policy Differential Rates dated March 2016 released by the Department of Local Government and Communities.

Mining operations should pay rates commensurate with the services required by them. Whilst this is likely to result in a premium relative to most other rates, Tronox considers the UV – Mining rate increase from 0.4227 to 10.0000 is excessive. Tronox objects both on the basis that the proposed increase, on the back of consecutive increases well in excess of inflation, is excessive; as well as to a number of the Shire's stated reasons for the size of the premium on the Mining rate relative to other rates.

Tronox's objections to the Shire's stated reasons for the Mining Rate are described below:

1. *UV Mining – this category is rated higher than UV Tourism & Accommodation, UV General, UV Intensive Agriculture and UV Renewable Energy to reflect the higher costs to Council as a result of these activities;*

The activities associated with mineral exploration are generally commensurate with rural activities in terms of the likely load they present to Shire services. For example, Tronox undertake mineral exploration within the Cooljarloo tenements for approximately 4 months

of the year. The exploration team comprises 3 personnel operating a drilling rig (land cruiser or light truck mounted aircore rig) and two support vehicles (land cruiser and/or light truck). As such, exploration presents a similar (or lower) cost on Shire services to other rural users and certainly not the types of burdens listed in the Mining Rate justification provided by the Shire and should be rated accordingly.

2. *The higher rate mining properties pay is to ensure they adequately contribute to the cost of Shire services as they are heavy users of the Shire's infrastructure and contribute to its deterioration at a far higher level than other properties. The minimum rate recognises that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council, regardless of the value of their property.*

As above, the cost imposition to the Shire of Tronox's mining activities is not substantial given Tronox already contributes to the Shire on a number of fronts.

Tronox maintains in-house emergency response capabilities which enhance existing Shire services. As a significant portion of Tronox's tenements occur over Unallocated Crown Land, fire management is the responsibility of the Department of Biodiversity, Conservation and Attractions (DBCA), not the Shire.

The Cooljarloo Project is regulated by the Department of Mines, Petroleum and Exploration (DMPE) and the Department of Water and Environmental Regulation (DWER). There is no additional burden on the Shire for the regulation of environmental impacts listed.

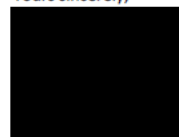
As an alternative to the Shire's proposal, Tronox suggests a discussion on the following proposals is warranted:

**Proposal 1:** the Shire introduce a reduced rate for mineral exploration and mining tenure where mining has not yet commenced at a rate aligned with Differential Rating Category: example; UV-General – 0.0037 or the rate be frozen at 2024/2025 values for the 2025/2026 Shire rates.

**Proposal 2:** Given the considerable differences in burden to Shire services presented by various mining operations that do and could occur within the Shire, perhaps a user pays model could be adopted. This user pays on a case by case approach to recouping the additional costs presented by mining operations would ensure that the charges levelled are fair and just.

Tronox would welcome the opportunity to meet to discuss this matter. Please contact Katherine Quick on 0435 441 569 for that purpose, or if you require any additional information.

Yours sincerely,



Tenement Specialist

Submission	Officer Response
<p><b>Tronox holds sixteen exploration and mining leases within the Shire of Dandaragan... Tronox also operates the Cooljarloo Mine within that footprint and clean up work at the historic Jurien mine site is also ongoing.</b></p>	
<p><b>Since 2021, Tronox has paid approximately \$78,500 in the form of Shire Rates... and contributed \$73,815 since 2024 towards the maintenance of roads used by Tronox for the transport of ore.</b></p>	<p>The contributions Tronox has made via both rates and its Road User Agreement are acknowledged. These agreements are valuable to supporting the Shire's ability to maintain road infrastructure associated with mining activity and the increased utilisation of local roads for the haulage of bulk material.</p>
<p><b>Tronox is also a major contributor to the Shire in other ways, being a major employer a principal to multiple contractors and service providers in the area and the supporter of multiple community and educational groups through its community engagement initiatives.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>It is Tronox's position that the proposed differential rates are excessive and not justified, and in conflict with the Key Values contained within the Rating Policy Differential Rates. released by the Department of Local Government and Communities.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>Mining operations should pay rates commensurate with the services required by them... Tronox considers the UV – Mining rate increase... is excessive.</b></p>	<p>Differential rates are also a mechanism to reflect land use intensity and asset lifecycle impacts, not just annual service cost. The proposed rate will be reviewed in light of this feedback.</p>



<p><b>Tronox objects both on the basis that the proposed increase... is excessive; as well as to a number of the Shire's stated reasons for the size of the premium on the Mining rate relative to other rates.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>1. UV Mining – this category is rated higher than UV Tourism &amp; Accommodation, UV General, UV Intensive Agriculture and UV Renewable Energy... The activities associated with mineral exploration are generally commensurate with rural activities in terms of the likely load they present to Shire services. For example, Tronox undertake mineral exploration within the Cooljarloo tenements for approximately 4 months the year. The exploration team comprises 3 personnel operating a drilling rig (land cruiser or light truck mounted aircore rig) and two support vehicles (land cruiser and/or light truck).</b></p> <p><b>As such, exploration presents a similar (or lower) cost on Shire services to other rural users and certainly not the types of burdens listed in the Mining Rate justification provided by the Shire and should be rated accordingly.</b></p>	<p>Officers acknowledge that not all mining assessments generate the same impact. Council can consider the applicability of applying different rates to exploration versus operational mining, based on land use and infrastructure demands.</p>
<p><b>The higher rate mining properties pay is to ensure they adequately contribute to the cost of Shire services as they are heavy users of the Shire's infrastructure and contribute to its deterioration at a far higher level than other properties. The minimum rate recognises that all ratepayers have an equal opportunity to enjoy the facilities and services provided by Council, regardless of the value of their property.</b></p>	<p>The Shire recognises Tronox's existing contributions and agrees that this should be factored into broader assessments of impact. However, the UV Mining rate is based on land use classification and does not override or disregard voluntary or negotiated contributions made by proponents.</p>

<p><b>Tronox maintains in-house emergency response capabilities which enhance existing Shire services. As a significant portion of Tronox's tenements occur over Unallocated Crown Land, fire management is the responsibility of the Department of Biodiversity, Conservation and Attractions (DBCA), not the Shire.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>Proposal 1: the Shire introduce a reduced rate for mineral exploration and mining tenure where mining has not yet commenced at a rate aligned with Differential Rating Category: example; UV-General – 0.0037 or the rate be frozen at 2024/2025 values for the 2025/2026 Shire rates.</b></p>	<p>This proposal is appreciated and will be tabled for Council consideration as part of this process.</p>
<p><b>Proposal 2: Given the considerable differences in burden to Shire services presented by various mining operations that do and could occur within the Shire, perhaps a user pays model could be adopted. This user pays on a case by case approach to recouping the additional costs presented by mining operations would ensure that the charges levelled are fair and just.</b></p>	<p>A user-pays model may be appropriate in specific circumstances, and the Shire is already implementing this principle through Road User Agreements and development contributions. However, differential rating provides a transparent and consistent framework that captures broader infrastructure wear over time and contributions to overall community services and infrastructure. Council can consider the merits of the proposal in its decision-making process.</p>

27. APA – received on email 08/07/2025



APA Group  
APA Group Limited  
ACN 091 344 704  
Level 25, 580 George Street, Sydney NSW 2000  
PO Box R41, Royal Exchange NSW 1225

P+61 2 9693 0000  
F+61 2 9693 0093  
apa.com.au

8 July 2025

Chief Executive Officer  
c/of [council@dandaragan.wa.gov.au](mailto:council@dandaragan.wa.gov.au)  
Shire of Dandaragan  
PO Box 676  
JURIEN BAY WA 6516

Dear Mr Bailey,

**Re: Differential General Rates and Minimum Payments Proposal**

APA owns and operates both the Badgingarra (130 MW) and Emu Downs (80 MW) renewable facilities in the South West Interconnected System. APA has worked with both the landowners and the communities in which we have built the facilities to deliver long-term community benefits through various channels.

APA appreciates the opportunity to provide feedback on the Shire's current proposal to levy Differential Rates. Based on the current information and proposal provided by council, APA does not support the proposed Renewable Energy differential rates on the basis that the approach lacks transparency, cost certainty and fairness. APA does not believe the proposed rates reflect the proportionate and real impact of renewable energy projects on local infrastructure. Additionally, the proposal imposes an additional financial obligation on landowners, rather than project proponents.

Excluding the initial building and commissioning / decommissioning phases of a renewable project, there is minimal ongoing impact on infrastructure, so to impose an increased rate levy on the landowners seems unfair and unjustified in terms of actual impact to the community.

APA would like to work with the shire to determine a rate levy structure that better reflects actual cost recovery and provides transparency on the drivers of any increased charges.

In relation to the currently proposed differential rates, APA does not support the proposal that UV Renewable Energy be rated higher than UV Tourism and Accommodation and UV Mining. The current percentages ignore the sustained infrastructure burden mining and tourism places on local infrastructure. In contrast, the infrastructure impacts of Renewable Energy are temporary, and not comparable in scale or duration to those from tourism or mining operations.

We request the Shire not proceed with the current proposed differential rate for renewable energy and instead work in partnership with landowners and renewable energy proponents to determine a fair and equitable method.

Should you require any further information or wish to discuss our concerns please don't hesitate to contact me.

Yours sincerely,

A large black rectangular redaction box covering the signature and name of the sender.

Submission	Officer Comment
<p><b>APA owns and operates both the Badgingarra (130 MW) and Emu Downs (80 MW) renewable facilities in the South West Interconnected System. APA has worked with both the landowners and the communities in which we have built the facilities to deliver long-term community benefits through various channels.</b></p>	<p>It is acknowledged that renewable energy operators like APA often work collaboratively with landowners and local communities to provide long-term benefits alongside their operations. These contributions are a valued part of the broader impact of such developments.</p>
<p><b>APA appreciates the opportunity to provide feedback on the Shire's current proposal to levy Differential Rates. Based on the current information and proposal provided by council, APA does not support the proposed Renewable Energy differential rates on the basis that the approach lacks transparency, cost certainty and fairness. APA does not believe the proposed rates reflect the proportionate and real impact of renewable energy projects on local infrastructure. Additionally, the proposal imposes an additional financial obligation on landowners, rather than project proponents.</b></p>	<p>Concerns regarding transparency, fairness, and cost allocation in the proposed differential rating approach are noted. The intent of the proposal is to align contributions with land use impacts, while remaining within the existing rating framework. Input from operators and stakeholders will be considered as part of the review process.</p>
<p><b>Excluding the initial building and commissioning / decommissioning phases of a renewable project, there is minimal ongoing impact on infrastructure, so to impose an increased rate levy on the landowners seems unfair and unjustified in terms of actual impact to the community.</b></p>	<p>It is recognised that the most significant infrastructure impacts often occur during construction and decommissioning phases. However, rates are applied based on land use and valuation as assessed under current legislation, rather than on operational activity alone. The proposal aims to ensure that contributions reflect the broader implications of land use changes, and all feedback on fairness and proportionality is being considered as part of the consultation process.</p>
<p><b>APA would like to work with the shire to determine a rate levy structure that better reflects actual cost recovery and provides transparency on the drivers of any increased charges.</b></p>	<p>A willingness to collaborate on refining the rate structure is welcomed. Open dialogue with stakeholders is an important part of the process, and feedback regarding cost transparency and alignment with actual service impacts will help inform future rating approaches and ensure that any framework adopted is both fair and well understood.</p>

<p><b>In relation to the currently proposed differential rates, APA does not support the proposal that UV Renewable Energy be rated higher than UV Tourism and Accommodation and UV Mining. The current percentages ignore the sustained infrastructure burden mining and tourism places on local infrastructure. In contrast, the infrastructure impacts of Renewable Energy are temporary, and not comparable in scale or duration to those from tourism or mining operations.</b></p>	<p>Consideration of the differing infrastructure impacts across sectors such as mining, tourism, and renewable energy is an important aspect of differential rating. Each sector contributes to the use and wear of local infrastructure in different ways and over different timeframes. Tourism and mining activities often result in sustained or seasonal pressures, while renewable energy projects may have more intensive demands during specific periods—particularly during construction and decommissioning—with generally lower impact during ongoing operations.</p> <p>The current differential rating framework takes into account a range of factors, including land use classification, valuation, and projected infrastructure demand. Feedback on the comparative impacts of land use types provides valuable insight and will be considered as part of broader reviews to ensure that the rating approach remains proportional, transparent, and aligned with long-term planning objectives.</p>
<p><b>We request the Shire not proceed with the current proposed differential rate for renewable energy and instead work in partnership with landowners and renewable energy proponents to determine a fair and equitable method.</b></p>	<p>Collaboration between landowners, project proponents, and local government plays an important role in shaping policy approaches that balance development with community expectations. The current rating proposal is part of a formal process that allows for public input and review before any final decisions are made.</p> <p>Suggestions for alternative approaches, including partnership-based models, are valuable and will be considered as part of the broader evaluation of how best to manage land use impacts and ensure contributions to shared infrastructure and services remain equitable and transparent.</p>

28. Alinta Energy – Received 08/07/2025



8 July 2025

Our Ref: YWF-AES-[20250708]

Chief Executive Officer  
Shire of Dandaragan  
PO Box 676  
JURIEN BAY WA 6516

Via email: [council@dandaragan.wa.gov.au](mailto:council@dandaragan.wa.gov.au)

Dear Mr Bailey

**Proposed Differential General Rates and Minimum Payments**

Yandin Wind Farm understands the significance of renewable energy projects to regional communities and appreciates the opportunity to provide feedback on the Shire's proposal to levy differential rates.

As the owner of one of the largest and most efficient wind farms in the state, Yandin Wind Farm (211.7 MW), the proposal to introduce a higher differential rate for Renewable Energy is of keen interest. We support long-term community benefits through local programs and contributions that promote local social and economic growth and welcome the State Government's Draft Guideline on Community Benefits for Renewable Energy Projects.

We do not support differential rates for Renewable Energy as we are concerned the approach may lead to inequitable outcomes and introduce uncertainty as to the long-term operational costs for project proponents and host landowners. We are also concerned that the approach does not align with the timing of the majority of the impacts that renewable energy projects have on local infrastructure, and that it imposes the financial obligation on host landowners, rather than project proponents.

Based on our experience, the most significant impact to local infrastructure occurs during the construction and decommissioning stage of a renewable energy project, while the operational phase imposes minimal ongoing impact. We are concerned that applying a long-term rate on a landowner across the full project life is not only inequitable but also has the potential to undermine the viability of renewable energy projects and associated community benefits schemes. This is contrary to the State Government's draft guideline which promotes consideration of the cumulative impact of any change in ratings approach with any community benefits program to ensure the commerciality of renewable energy projects is maintained, sovereign risk is reduced, and that revenue is split fairly between hosting councils seeking to recover costs, and communities seeking benefits for hosting renewable energy projects.

We also note that, under the proposal, UV Renewable Energy would be rated higher than UV Tourism and Accommodation. Based on the conflicting information provided in the Proposed 2025/2026 and Comparison Year on Year tables in the Statement of Objectives and Reasons, it is unclear if UV Renewable Energy will be rated higher than UV Mining. Applying a higher differential rate to renewable energy projects is not supported by evidence and overlooks the sustained infrastructure burden tourism (and mining) places on local infrastructure. In contrast, the infrastructure impacts of Renewable Energy are temporary, and not comparable in scale or duration to those from tourism or mining operations.

We advocate for an approach to the collection and coordination of contributions for infrastructure, directly from renewable energy project proponents, that embodies similar principles to State Planning Policy 3.6 – Infrastructure Contributions. An approach of this nature is appropriate as it will:

- Link contributions to actual infrastructure use;
- Provide transparency and certainty for all parties through formal agreement;
- Ensure accountability and proportionality;
- Support sustainable infrastructure funding without penalising landowners; and
- Maintain clear separation between cost recovery and community benefit initiatives.

Unlike differential rating, an approach that levies infrastructure costs by agreement ensures the Shire benefits from a sustainable and predictable funding stream while landowners benefit from infrastructure improvements without increasing the rating cost. Renewable energy proponents gain from a collaborative and consistent process that supports community trust and long-term project success.

Our view is that the Shire should not proceed with the proposal to establish a differential rate for renewable energy for the reasons set out in this letter. We are willing to work in partnership with the Shire to assist in the development of a cost recovery approach that does not undermine the viability of renewable energy projects, the trust of landowners or broader local community benefit schemes.

Thank you for the opportunity to provide this submission. Should you require further information or wish to discuss our concerns please contact Alinta Energy's Regulation and Compliance Specialist, Jean Mileto, on [Jean.Mileto@alintaenergy.com.au](mailto:Jean.Mileto@alintaenergy.com.au) or 0437 014 596.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Jacinda Papps".

Jacinda Papps  
General Manager, Regulatory Affairs and Compliance  
Alinta Energy

CC: Office of the Minister for Local Government  
Office of the Minister for Energy

Submission	Officer Response
<p><b>We do not support differential rates for Renewable Energy as we are concerned the approach may lead to inequitable outcomes and introduce uncertainty as to the long-term operational costs for project proponents and host landowners alike.</b></p>	<p>The proposal aims to ensure fair contribution based on land use and impact, but the feedback regarding equity and stability is appreciated and will inform Council's deliberation.</p>
<p><b>We are also concerned that the approach does not align with the timing of the majority of the impacts that renewable energy projects have on local infrastructure, and that it imposes the financial obligation on host landowners, rather than project proponents.</b></p>	<p>It is acknowledged that the greatest infrastructure impact typically occurs during construction. The rating mechanism must apply to landowners under the <i>Local Government Act 1995</i>, there is currently no legislated solution for the collection of rates from renewable energy proponents on leased land.</p>
<p><b>Based on our experience, the most significant impact to local infrastructure occurs during the construction and decommissioning stage of a renewable energy project while the operational phase imposes minimal ongoing impact.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>We are concerned that applying a long-term rate on a landowner across the full project life is not only inequitable but also has the potential to erode the viability of renewable energy projects and associated community benefits schemes.</b></p>	<p>Officers acknowledge that financial models for renewable energy projects are sensitive to ongoing costs. The lack of a legislative mechanism for equitable contributions towards the rate base from the renewable energy sector has been a driver of the current proposal.</p>

<p><b>We advocate for an approach to the collection and coordination of contributions for infrastructure, directly from renewable energy project proponents, that embodies similar principles to State Planning Policy 3.6 – Infrastructure Contributions.</b></p>	<p>The Shire is open to exploring alternatives that align with State Planning Policy principles, including cost recovery frameworks through negotiated agreements. However, local governments currently have limited mechanisms to levy proponents directly, which is why differential rating was considered. The Shire would welcome further discussions to help develop a framework that supports both infrastructure sustainability and project viability.</p>
<p><b>Unlike differential rating, an approach that levies infrastructure costs by agreement ensures the Shire benefits from a predictable funding stream while landowners benefit from infrastructure improvements without increases to the rating cost.</b></p>	<p>Officers agrees that predictable and fair cost recovery models are desirable. While differential rating is one of the few statutory tools available under current legislation it should also be recognised that ratepayers contribute to a broad range of community services and infrastructure throughout the district.</p>
<p><b>Renewable energy proponents gain from a collaborative and consistent process that supports community trust and long-term project success.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>Our view is that the Shire should not proceed with the proposal to establish a differential rate for renewable energy for the reasons set out in this letter.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>
<p><b>We are willing to work in partnership with the Shire to assist in the development of a cost recovery approach that does not undermine the viability of renewable energy projects, the trust of landowners or broader local community benefit schemes.</b></p>	<p>The comment is noted and tabled for Council consideration.</p>



<p><b>Should the Shire elect to proceed with the proposed differential rating scheme, it is essential that further clarity is provided on when the Shire would determine that properties involved in renewable energy projects are deemed to fall into the UV – Renewable Energy category.</b></p>	<p>The Shire acknowledges this request for clarity. It is currently proposed that properties enter the Renewable Energy category once generation commences and projects are exporting energy to the transmission grid.</p>
<p><b>It would not be reasonable for this to occur prior to the commencement of renewable energy project construction.</b></p>	<p>The comment is noted and tabled for Council consideration and addressed above.</p>