



**Economic Regulation Authority  
Landgate submission on Review of the Emergency Services Levy 2017**

**Submission regarding 6.2.4 Grouping of properties**

There are more than 12,000 gross rental value assessments which comprise multiple lots. These groupings are determined by the Valuer General reflecting the provisions of the *Valuation of Land Act 1978 (VLA)*, legal precedent and valuation policy. The VLA provides that in valuing land, the Valuer General is not subject to direction from any person.

Group values reflect an occupation of land extending across more than one lot. In many cases it isn't practicable to determine a GRV for each individual lot in these circumstances.

Group value examples which are impracticable to assess individually include:

- buildings that straddle lot boundaries.
- a house on one lot which is only has access from a driveway over the other lot.
- a house on one lot and a swimming pool or tennis court on another lot
- farm house, sheds and other outbuildings located across various lots.

In each case splitting these assessments would be contrary to legal precedent and Valuer-General's policy. These values may be utilised by DFES, Local Governments and Water Corporation. If ESL was to be separately assessed for these lots, it would lead to unnecessary complication and potential confusion. Spitting up these valuations would involve significant effort and cost, as physical inspections would be necessary in many cases.

I reiterate that group values are determined by the Valuer-General to reflect the provisions of the VLA and legal precedent. Any change in the group value process including the abolition of group valuations would be a decision for the Valuer-General.

**Submission regarding 6.2.5 treatment of vineyards**

As mentioned in the report, a review of property classifications provided to DFES for vineyard properties was undertaken by Landgate in 2013. This is considered to have substantially enhanced the fairness and accuracy of these classifications.

The classifications are provided to DFES to assist with the ESL levying process. Landgate doesn't propose to undertake any further reviews however property owners may refer any queries concerning the classifications to DFES. DFES also has a formal classification objection process in the event that the matters cannot be resolved at the query stage.

Lester Cousins  
**VALUER-GENERAL**

10 August 2017