

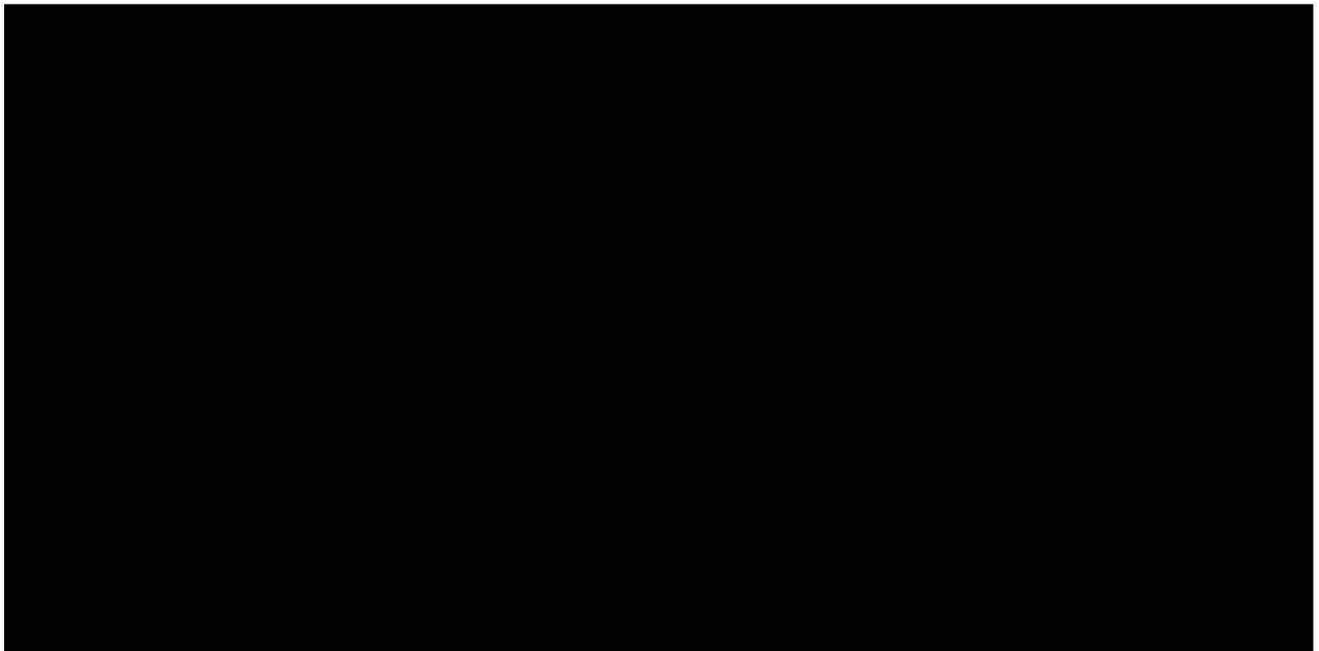
Dear NSW Treasury,

Thank you for allowing myself and the community the opportunity to respond to the NSW Proposed Property Tax consultation paper.

As a property home owner, investor, landlord and community member please find below my concerns and my feedback, which is also the concerns of many other persons with whom I have discussed these issues about the NSW Proposed Property Tax. I have referred to the proposed tax as a Land Tax because it is unclear to me as to what you are calling a Land Tax and what you are calling a Property Tax. Please establish one clear and understandable term, preferably Land Tax, as that is the common term if my understanding is correct.

Unless particular items below are acted upon by Government, we will find ourselves paying much more property taxes in the future than we do now and many poorer members of the community will increasingly be deprived of affordable and comfortable accommodation.

Your sincerely,



Feedback

MOST IMPORTANT QUESTION LEFT OUT OF GOVERNMENT SURVEY

Q4 of the Government Survey asked:

“How important would each of the following be to you when deciding to purchase a residential property in NSW? “

Nowhere in the options available was there a possible answer of the greatest interest to almost all property owners.

Land Tax was not offered as an option for comment. Property Tax was not offered as an option for comment.

And yet, current Land Tax and possibly the new Property Tax may well possibly be the main reason that property owners do not purchase in NSW.

LAND TAX is an economically damaging tax fraught with problems that include increasing the cost of housing and business premises for all community members, reducing the size of homesites (yards) and thereby causing health, exercise and socialising problems for children, families and pets, reducing the amount of available housing at the margin due to increased holding costs preventing and deferring purchases, creating smaller living accommodations that reduce employment in the building construction and supply industries, creating social problems due to increased densification of living and the emergence of high rise homes as the only financially viable option for many home buyers instead of homes with their own yards and gardens.

Land Tax increases the cost of housing and other buildings for all community members.

Land Tax creates an increase in outgoings by investors, business owners and/or homeowners who either live in, work in, or rent out property and Land Tax is imposed irrespective of citizen's income and their ability to pay. Land Tax is grossly unfair as it can cause financial hardship and failure for those with low incomes who cannot pay. Those who are doing good works for society such as assisting others on low incomes, or with spiritual aspirations, are the most vulnerable to exploitation by Land Tax.

The expense of Land Tax creates an economy wide propensity to construct smaller buildings to reduce the amount of Land Tax payable. All building sizes are potentially reduced as a result and the land allocated for those buildings is also reduced in size by demand from price conscious purchasers. ALL properties are affected, including residential, commercial and industrial properties. **The conclusion is that the increase in Land Tax causes higher costs of living for home owners and all property owners and/or reduces the size of building sites and/or reduces the size of buildings due to Land Tax induced cost cutting and lowered affordability.**

Land Tax reduces the size of homesites (yards) causes health, exercise and socialising problems for citizens, children, families and pets.

Less land due to Land Tax charges simply means less private land available for recreational purposes such as children's play, gardening (particularly as exercise for the aged), and for socialising with neighbours and friends at parties and barbecues. Eventually "Throw another prawn on the barbie" ceases to be an Australian activity and becomes Australian history, and children must play indoors rather than in a safe backyard environment. **The conclusion is that Land Tax ensures less happiness, less exercise and play, more mental stress, more ill health, and a more divided less inclusive society.**

Land Tax reduces the amount of available housing at the margin due to increased holding and owning costs preventing and deferring purchases.

The imposition of Land Tax causes higher costs to hold Land and the number of community members who can afford to buy and hold a property is reduced by the amount of the additional weekly income that is taken by Land tax.

Land Tax also affects the ability of home and investor purchasers to buy property as the amount they can borrow to make a purchase is proportionally reduced by **multiples** of the amount that is allocated for annual Land Tax payments. The reduction of an aspiring buyer's ability to purchase is a **multiple** of the amount of Land Tax paid as it is the aspiring buyer's net income that lenders use to determine the TOTAL amount to be loaned.

The conclusion is that weekly expenses are increased by Land Tax and tens of thousands of dollars of borrowing capacity will be taken away from first home owners and all other Land Tax payers thereby further reducing the standard of suitable building for accommodation or business use that they can afford. This is problematic for the economy, health and socially acceptable living standards and will also reduce the demand for property at the margin as it becomes unaffordable. This is already the case for some investors due to existing high property taxes. Low income earners and start-up cash strapped businesses are, and increasingly will be, the most affected and the most harmed by Land Tax as government policy. Otherwise successful businesses and employers of citizen's labour are not, and increasingly will not, be commenced due to the imposition of Land Tax.

Land Tax creates smaller living accommodations that reduce employment in the building construction and supply industries.

As Land Tax causes smaller housing and land allotments for development and use there is a proportional decrease in the demand for building materials and labour when construction begins on any building site be it residential, industrial, commercial or other. **The conclusion is that Land Tax reduces employment directly and indirectly in the building and building supply industries.**

Land Tax creates social problems due to increased densification of living.

It is a stated result, and even intention, by Land Tax proponents and researchers that *Land Tax creates a more “efficient” economy by reducing the amount of land consumed* for all purposes. The end result of this irrational perspective is that all people will, over time, be forced to live in very small rooms with no yards if Land Tax is increased sufficiently. Land Tax, and the extent to which it is charged, is the ultimate arbiter of how much space individuals and families can have to live in as homes, and to work in, as workplaces or businesses. This widespread and totally controlling aspect of Land Tax and government enforcers is totalitarian in nature and goes to the very roots of human rights of free expression, the right to comfortable living space, and the right to have freedom through sufficient workspace to be creative in the arts and businesses.

Australians, including NSW citizens, have a right to comfortable tax free living space, either rented or owned, and to not be evicted or penalised by Land Tax revenue seeking governments. Good quality and affordable homes are a measure of citizens freedom, mental health and engagement in their society.

High rise and high density accommodation, which is directly increased by Land Tax, is known for increasing social and health problems that range from theft and assault, to mental health, obesity and other metabolic diseases. **The conclusion is that Land Tax reduces the availability of appropriate housing and business**

and workplace premises and creates widespread physical and mental health problems for all people and most particularly for children, parents and the aged.

Land Tax directly creates the emergence of high rise homes as the only financially viable option for many home buyers instead of homes with their own yards and gardens.

Due to Land Tax induced increased holding costs and reduced borrowing ability to purchase more spacious homes, and homes with yards, the propensity for Land Tax to reduce the size of each property by marketing techniques including high rise construction and small area accommodation become the housing norm. **The conclusion is that Land Tax reduces standards of living and quality of life particularly for lower income earners.**

Land Tax increases low income disadvantage.

Land tax distorts the allocation of housing by increasing the costs of holding property for investors when it is charged at a different rate for investors vis a vis others such as residential live-in owners. The result of imposing a Differential Land Tax based on the land value of the property is that investors will reduce the amount of property they purchase for rental purpose at the margin and therefore the amount of property available for rental purposes is reduced at the margin. **This is already the case** and as a result of the NSW Government charging investors Land Tax **rents are higher than would otherwise be the case because of Land Tax** reducing affordability for investors to own and provide rental accommodation at the margin. The most disadvantaged people are those who are most affected by this outrageous effect of Land Tax, the poorer are made even poorer as a result of Land Tax and suffer

accordingly. **The conclusion is that rents are higher because of Land Tax, and lower income citizens, by numbers, are by far the most disadvantaged because of Land Tax.**

Land Tax even further reduces available residential accommodation.

Due to increasing Land Tax there is a propensity for investors to move away from the higher Land Tax imposed holding costs of residential property. The higher returns possible by investing in short term accommodation premises such as those provided through AirBnB and similar accommodation service retailers becomes more attractive to investors when returns from long term residential rental property is reduced due to higher government charges including Land Tax. The result is, on top of already reduced demand by investors due to Land Tax as explained above, that investors invest in short term accommodation to obtain higher returns. Thus the Land Tax induced increased investor demand for more short term rental properties reduces the number of long term rental properties available for rent as these are purchased and converted to more expensive (higher rent) short term rental properties which are not affordable for long term (permanent) renters.

Land Tax is more than even a Triple Whammy for renters!

The conclusion is that rents are even higher because of Land Tax, and lower income citizens, by numbers, are by far the most disadvantaged because of Land Tax which reduces available long term rental accommodation by by several adverse effects that reduce available rental accommodation.

How Land Taxes could be spent for the betterment of society and renters.

To provide lower rents and better living conditions for tenants Land Tax paid could be rebated for the amount spent on property improvements by the owner. This would achieve a direct improvement for tenants living conditions and remove some of the difficulties faced by low income property investors. As the investors would ensure the money was wisely spent there would be no expenditure by government and tenants would receive the full benefit of the expenditure.

GOVERNMENT PRESENTATION OF EXAMPLES APPEARS BIASED

The Government produced a web page entitled "What Could This Mean For You"

see

<https://www.treasury.nsw.gov.au/budget-financial-management/reform/nsw-property-tax-proposal/what-could-mean-you>

This appeared to be a very biased communication citing examples which favoured the new Property Tax when in reality, there were serious disadvantages of the new system and information not forthcoming.

LOSS OF LAND TAX THRESHOLD

Of major concern is the fact that the Government has not specified how the annual increase in the existing land tax thresholds will be calculated or if indeed, there will be land tax threshold increases each year as there has been in the past.

If Land Tax thresholds are not increased in the same manner in which they are currently done pursuant to section 62TBB (3) of the *Land Tax Management Act 1956*, ("the percentage by which average land values of land within residential, commercial, business and industrial zones have changed between 1 July one year and 1 July the next"), then it will be

obvious that this lack of increasing threshold that has existed in the past is not being renewed in order to specifically force investment land owners move over to the new Property Tax.

Over the last 10 years, the average percentage increase of the General and Premium land tax threshold has been 6.6%. With increasing land values without a corresponding increase in the land tax threshold, all investment property owners will eventually be hit with land tax once their land values eventually exceed the current stationary threshold.

If that is the case then no property investor will want anything to do with the proposed Property Tax.

HOW CAN THE ELDERLY MEET NEW PROPERTY TAX PAYMENTS FOR THEIR OWN HOME

The focus of the Government appears to be on the deflection of the real issue which is to introduce a new money train for the Government with property purchases. Is the Government able to explain how, in 30-40 years' time, an elderly person is going to meet an additional land tax impost on their home, when currently most struggle to pay their rates and power bills in today's market? Will this not only increase this hardship and force more elderly home owners on to Government assistance again?

Also, it is not an option to say that the aged, upon their death, will be able to pay deferred or unpaid Land Taxes. Such a policy is a huge disincentive to home ownership aspirations that begin early in life. Home ownership is a societal stabiliser with many, many positive outcomes and should be a focus of government support policies for the good of citizens and society. Home ownership and quality rental accommodation give zest and substance to citizenry who are then enamoured to be socially good contributors to society, and economically productive.

Equally, the less wealthy should be able to pass on their lifetime of accumulated wealth, which is frequently the home that they live in, to their children or relatives. The family home is frequently the prized trophy of a lifetime of effort and devotion to family by parents who intend to proudly hand on to their loved and surviving relatives. It is the poorer and the working class who are primarily deprived of this trophy and gifting by Land Taxes that will suck away their wealth and prevent them from saving a home deposit because Land Tax raises their cost of living and rents for the many reasons, and more, stated in this submission.

OWNER OCCUPIER AND INVESTOR SHOULD BE AT THE SAME RATE

Land should be taxed the same base amount and rate for all people and not provide advantages or disadvantages to one group or another. Under the current system this is done because Owner Occupiers and Investors with only one or two properties (and thus total NSW Land Value under the \$755,000 threshold) do not pay land tax.

In proposing the new Property Tax, the Government quotes the manner in which Council rates are levied as an example of how the new Property Tax will work.

Council rates are the same for everyone with a possible discount for seniors. Why does the NSW Government not follow a similar methodology for all property owners and thus charge the same rate for both Owner Occupiers and Investors? And if it does want to have a system similar to that of Council rates, then also provide a discount for seniors?

The new Residential Investor Property Tax rates shown are significantly higher than the Owner Occupier rates. At this stage with an Unimproved Capital Value of say \$450,000, you are looking at \$6,000 per year Property Tax compared to \$1,850 for the Owner Occupier. This is more than three times the amount. This is too much of a difference. Investors should not need to pay three times as much as an owner occupier in Property Tax.

Such an impost will undoubtedly reduce the number of investors, reduce the supply of rental properties and increase rents.

Whether it is recognised by the Government or not, residential property investors do help to provide housing to those who cannot afford to purchase their own home and investors help to assist in providing housing where the Government is often expected to provide such housing – e.g. housing commission or “social housing”. Overall, governments have been shown to be failed property investors and large scaled sell-offs, and reduced acquisition of, of government owned housing has occurred over the past fifty years. It is non-sensical for governments to bail out of their failed “social housing” ownership management and to then seek to gouge taxes out of the investors who have provided housing where the governments have failed. Investors, and through them renters, should be supported by government and not penalised for government failures. The governments of Australia and NSW are now losing less money and getting better societal outcomes by having passed the rental problem onto investors and the government has then tax gouged investors with high Land Taxes and now proposes even higher and more punishing Land Taxes for investors and home owners.

Since some of these Residential Property Investments thus provide an element of social housing, especially whilst the Government is in the process of selling a lot of such public housing, investors should not be penalised in the way that they currently are but rather be supported. This would thus help the Government in the provision of housing, property investors do not rely on Government grants in retirement and social housing for the community – a win/win/win situation.

In discussing the role of Residential Property Investors in providing housing for those not able to yet purchase property, rents should be determined by market conditions and not have additional Government imposed factors which favour the tenant to the detriment of owners. More and more legislation and rules are being enacted by Government for the benefit of tenants and this is a good thing. PICA’s view is that any property investor who does not treat their tenant in a manner which they

themselves would want to be treated as a tenant, should not be a property investor.

However, it is the property investor and not the Government that is the entity that must pay for all of the additional costs that these changes cause and which are solely for the benefit of the tenant. Yet whilst the Government is decreasing its social housing expenditure, it expects the costs caused by these new rules to be borne by the property owner. Property owners everywhere would always support additional legislation and rules for the benefit of tenants if all of the cost burden of such rules was paid by the Government.

For this reason I call for any new Property Tax to be the same for all property owners and not a different rate for Owner Occupiers versus Investors.

WHY NOT SIMPLY CHANGE THE STAMP DUTY TO A FAIRER RATE?

When Stamp Duty was first introduced by the NSW Government it was at 0.5%. If the Government wants a fairer tax then Stamp Duty should revert more to the original level than the current 4+% which has only disadvantaged property buyers across NSW. That would be a fairer system for all people purchasing property.

CAPPING RENT INCREASES?

This new Property Tax will eventually result in increased taxes for the majority of property investors. As ATO statistics (2017-2018) show, around 90% of residential property investors own only one or two investment properties and the majority of these people in NSW have total NSW land holdings which are below the current land tax General threshold of \$755,000 for 2021.

Increased taxes have to be paid by someone. It is lacking in sense to believe that taxes may be increased and rents will not increase because a household at the 'end of the line' will 'feel the pinch' and respond in some way. If property investment was a risk-free investment, why would the Government not become more involved in this themselves? Government has proven its poor residential property investment abilities time and time again and has therefore been reducing its "social housing" involvement for most of the past fifty years. Land Taxing the property investor goose that has laid the Golden Egg by saving governments from their incompetent investing in 'social housing' is courting disaster as those Land Taxes are currently choking, and will eventually kill, the property investor goose.

Property investment has been taken on by many Australians and New South Wales citizens because they feel they do not have the business acumen or capability to commence their own business, they are too worried about the total loss of their savings to invest in the stock market and they cannot get anywhere near a reasonable return on any funds they may have in the bank. Yet these same citizens want to try and give themselves every possibility to be able to eventually retire and not go to the Government in retirement for continual handouts.

This only leaves Property Investment as a means of achieving this and the majority of these investors do not know enough about anything other than Residential Property.

Such property investors should not be penalised by having onerous rental caps in place or tenancy legislation aimed specifically against them. It is already the case that property investment has become much more difficult due to Government and Banking decisions which have targeted property investors by increasing the interest rates for Investors and for Interest Only loans. When the Government and Banks took these decisions to make it easier for Owner Occupiers, they did not reduce the interest rates for Owner Occupiers but instead increased the interest rates for investors.

Further disadvantaging Residential Property Investors by making them pay three times the amount of Property Tax as for a normal Owner Occupier is wrong. Doing so is a real walloping for *renters* for the reasons stated in this submission.

OUT OF PROPORTION WITH WAGES GROWTH

Land value increases at a greater rate than wages growth. The Government needs to set this new Property Tax such that annual increases in the Property Tax are based on the actual increase in wages of the people and not simply applying a percentage increase based on Government land valuations.

As investor rental incomes are frequently not related to property values Land Tax is an unfair means by which government takes from investor incomes. Unfairly, Land Tax must be paid even if investors lose money or have no income at all. This can cause investors even far greater losses through a forced sale when economic conditions are tough or a family financial or health problem must be solved.

PROVIDE ADVANTAGE FOR ACCOMMODATION FOR LESS WELL-OFF

The Government should look to provide concessions for holders of multiple properties who provide accommodation for people who cannot afford property. Governments now appear to be selling off Government or community/social housing and wanting everyday Mum and Dad investors to fill the gap.

Investors should be encouraged and incentivised to keep providing accommodation thus creating more housing for people who may not be ready or able to buy.

BAD DEAL FOR THE MAJORITY OF RESIDENTIAL PROPERTY INVESTORS LOSS OF LAND TAX THRESHOLD

This is a really bad deal for owner occupiers or owner occupiers with only one or two investment properties. The majority of investment property owners are in this category – (The average number of investment properties owned by Australian residents who own any investment property is 1.49 based on ATO statistics 2017-2018). Currently no land tax is payable in the case of an owner occupier or an owner occupier with one or two investment properties (where total investment land value in NSW is less than \$755,000 this year). Eventually, these people will need to pay land tax either because they purchase an investment property which has previously paid Property Tax (and therefore is now forced to take up the new Property Tax scheme) or because of land tax “bracket creep” due to no increase in land tax thresholds.

The new Property Tax proposal does not include increasing the old land tax threshold at all let alone anywhere near its current average annual increase of around 6.6%. If there is no increase in the land tax threshold, this means that over time those current investment owners with only one or two properties will end up paying land tax as their total land value grows and begins to exceed the 2021 land tax threshold of \$755,000.

This will also distort the market in that a property which has been purchased using the new Property Tax instead of the old Stamp Duty and Land Tax will not be able to revert back to Stamp Duty and Land Tax. Any owner with one or two investment properties looking to live in that property or rent it for a long period of time will therefore favour purchasing any property which is not under the new Property Tax regime. In this way they will only pay Stamp Duty and not land tax. A person owning an investment property with say \$400,000 land value will thus have the choice of paying zero land tax (plus Stamp Duty) or \$5,500 per

year Property Tax as their choice. The longer they own this property, the more advantageous is the zero land tax option (unless the new proposal does not increase Land Tax thresholds as described above)

IF MORE TAX THEN MORE RIGHTS

Governments seem to think that businesses and investors are cash cows who may be milked for more taxes but in return do not receive any compensation, reduced red tape, improved support or services.

Increasing the effective taxation on investment properties should be accompanied by commensurable benefits such as:

- * Lifting restrictions on rental bonds to more realistic levels based on property damage claim statistics,
- * removing the one month limit for initiating the eviction of a defaulting tenant,
- * giving the Police powers to intervene in property related emergency incidents such as threats of property damage, actual property damage, clear cases of trespassing / illegal occupation and
- * giving investors the right to select any resident they choose without restriction,
- * making approved damages compensation much more accessible, and
- * making direct tribunal orders against income rather than having to go through a court process after a tribunal process.

The main reason one would not invest in another rental property in NSW is that it is not an investor friendly jurisdiction to invest in; the tenants being given way too much leeway and the investors way too little. The property investment framework in Australia is becoming more socialist-like from an international perspective with owners having too few property rights. If the Government want to tax investors more they should give investors more rights.

NOT LOCKED IN TO PROPERTY TAX

All purchasers should have the choice of paying stamp duty / land tax or paying the new Property Tax. One shouldn't have to pay Property Tax just because the owner before you opted to.

Within our survey over 65% of our members want to be able to choose stamp duty/land tax or Property Tax regardless of whether the new Property Tax was already in place for that property. Also the new Property Tax should not be a perpetual tax but should be capped at the equivalent of what the stamp duty & land tax would have been. This way the purchaser is not worse off overall.

CHOOSING OTHER STATES OR ASSET CLASSES

When a person buys an investment property the amount of rent to be received is mostly based on similar prices in that area. If the rental cannot be increased in order to offset the annual Property Tax because the property rental is now too high and the property cannot be leased, then that investor would either have to choose to invest in other states that don't have such a Property Tax or, if all states begin to move to such an annual tax without threshold, would have to move to another asset class such as shares. It is interesting that other asset classes such as shares do not have any such annual tax based on their value as at a certain date each year.

PROPERTY TAX FOREVER

Trying to look positively at the new Property Tax proposal, the biggest concern our members had was that the ongoing Property Tax with no end date is actually providing a disadvantage to those who cannot afford a lump sum.

Ongoing Property Tax should be limited and capped with a fixed amount. Such an annual Property Tax will be expensive for holding any property for the longer term. From NSW property owners' points of view, the Government may as well keep the one off stamp duty tax as it is now.

This new scheme disadvantages buyers who hold property for the long term as they will pay more than the initial stamp duty. The annual Property Tax should stop when the buyer has paid out the same amount as the initial stamp duty would have been.

AMORTISE STAMP DUTY

If you elect stamp duty then why not pay it off over a standard 5 year period? This will allow those with smaller deposits the ability to purchase (first home owners can enter the market a little easier). It is a dishonest pea and thimble trick by governments to remove Stamp Duty and replace it with Land Tax that, in the end, goes on for eternity and takes far more in revenue from each land purchaser than would, and does, Stamp Duty. It is the poor who have low cash levels for a deposit at the time of purchase who will be the main victims of this ploy.

ASSISTING YOUNG PEOPLE

Reducing the upfront cost of purchasing a property is a positive move to get younger people onto the property ladder especially in major cities. Overall there is not really much of benefit in this proposal for investors excepting that Stamp Duty should be removed without other damaging imposts such as Land Tax being subsequently applied. Land Tax should be abandoned for the reasons it stated herein and as agreed to by the Federal Government in the early 1960's when it abandoned Land Taxes. There is further clarity needed around the impact on existing Land Tax rules?

LAND TAX IS A BAD IDEA AND A BAD PRACTICE

Land tax is a bad answer to the government's funding problems- the Government(s) should stop slugging all types of property owners with excessive tax for trying to put roofs over people's heads including their own.

NOT TRUSTING GOVERNMENTS

There is a concern that the Government will keep raising taxes.

The proposed new Land Taxes, and the existing Land Taxes for investors, is a way of getting property owners to pay more taxes. If this goes ahead there should be legislation enacted that the new Property Tax is genuinely revenue neutral compared to existing revenues and that how this is calculated should be transparent to the people of NSW.

Many felt that the new proposal was not good for anyone except the State Government.

Below is a recount of what happened in California, USA, when the state government turned Land Taxes into a form of extortion. Land Taxes in California are still preventing or hindering the entry of first home owners ,and are plagued with other problems, even now after so many years of government ineptitude.

Californians had to rise up and vote in Proposition 13 to stop the huge Californian State Government rort that was forcing low income and unemployed citizens to sell their homes. This pernicious Land Tax was also causing great pain for the middle class and through Proposition 13 (a luxury not available to Australians) Land Tax was reduced:

“PROPOSITION 13

“On June 6th, 1978, nearly two-thirds of California’s voters passed Proposition 13, reducing property taxes by about 57%.

“Prior to Proposition 13, property taxes were out of control. People were losing their homes because they could not pay their property taxes, yet government did nothing to help them.

“In the finest tradition of the Boston Tea Party, California taxpayers stood up and said “No more!” to excessive taxes.

“The Proposition 13 Revolution swept the country and made headlines around the world. It began a change in thinking about the tax burden property owners had to bear. Proposition 13 also started a revolution in the people turning to the initiative process to gain greater control over their lives. (Howard Jarvis Taxpayers Association)”

CAPPING OF PROPERTY TAX TIME PERIOD

A positive of such new Property Tax annual payments is affordability and thus labour mobility as demonstrated by one of the Case Studies in the “What This Could Mean for You” Government examples. Annual payments should not prejudice those holding properties longer term i.e. they should be capped.

To encourage business and investment generally, they should be taxed less, not more. The consequence would then be an increased supply of business services and goods and of rental properties which should place downward pressure on prices and rents.

PROPERTY TAX THRESHOLD??

Perhaps the Government should consider a threshold for each property in much the same way that currently exists for Land Tax. This way, Owner Occupiers would still maintain some form of advantage whilst the small

property investor would not try and increase rent to cover such a large cost.

NEW SYSTEM NOT EXPLAINED SUFFICIENTLY – TOO MANY UNKNOWN DETAILS

The Government has not outlined how joint ownership will be handled? Is this \$500 each for owner occupiers plus 0.3% as opposed to \$500 in total plus 0.3%. And is it \$1,500 each for property investors plus \$1% or is it \$1,500 in total plus 1%?

There has been no explanation of what rates will apply for Self-Managed Super Funds, Special Trusts, and Fixed Trust? This sounds like something is being hidden from us?

The Government has not explained whether or not the current Land Tax thresholds will be increased each year in much the same way they have increased over the last 10 or 11 years – i.e. around 6.6%