

## LAND VALUATION AMENDMENT BILL 2023

**Submission No:** 23  
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**Submitter Comments:**

21 September 2023

Committee Secretary  
Transport and Resources Committee  
Parliament House  
George Street  
BRISBANE QLD 4000

Dear Secretary

**RE: Land Valuation Amendment Bill 2023**

I am writing to object to the Land Valuation Amendment Bill 2023 (**Bill**) and the proposed amendments to the *Land Valuation Act 2010* (**LVA**).

I am concerned that if the Bill is passed it will result in the following:

1. In higher land tax and rates for landowners; and
1. compromise the transparency and consistency in the way that the Valuer-General makes valuations of land in Queensland.

One of the major concerns is the concept of guidelines

My understanding is that these guidelines will be binding in relation to the valuations to which they apply.

The issue here is that these guidelines would move away from what I consider precedent that has been used in the past and replace these with guidelines that could easily be to the detriment of land owners.

If the guidelines promote and advocate the interests of the community and landowners that could have positive outcomes. However if it ignores the interests of landowners, and adheres to pressure from activists, of which there are many with varied and questionable intentions could cause a very negative position for landowners.

Guidelines unless closely monitored, vetted and held to account will destroy the transparency with which valuations are made and compromise their defensibility.

Landowners must have the right to affectively object to valuation decisions. These guidelines will severely limit this ability. If it's a guideline it cannot be appealed successfully.!!!

In this instance the only appeal able matters would be:

limited to the guideline being incorrectly applied or the correct guideline was not used.

If guidelines are determined with the interest and input of Landowners then the proposed change may work. If not it is possible the guidelines may skew decision and provide an undesirable and unfavourable outcomes for landowners .

My concern also covers off circumstances where the guidelines may in fact be incorrect based on previous precedents and decisions. If this occurs landowners will be greatly disadvantaged.

Any proposed guidelines need to be open for public comment and provided with ample time for debate before it is considered by Parliament.

The proposed amendment may mean that landowners face increased cost in objecting to or appealing against valuations made and that those valuations will be artificially inflated,.

It is important to note that many Landowners offer viable employment opportunities for tens of Thousands of Queenslanders. This point is often overlooked. Businesses require a place to conduct their business. Landowners offer that space. To put landowners in an unfavourable financial position will impact on employment prospects for all Queenslanders.

The Bill proposes to amend the processes by which deductions for site improvements may be made and non-adjointing farm lots are included in the same valuation.

This appears misguided. Separating deduction applications from objections is likely to increase costs for landowners. Instead of making one application, landowners will be required to make two separate applications to seek a deduction and object to a valuation issued by the Valuer-General.

Similarly, the Bill proposes to require that landowners make an application to combine non-adjointing farm lots or parcels in the approved form.

These changes will simply lead to increased costs for landowners in dealing with the Valuer-General.

I am concerned the proposed changes will negatively impact on my business. This will reduce my desire to invest in property and this will ultimately be reflected by Landowners divesting themselves of these assets and leaving a void.

As a landowner we are constantly bombarded with increased costs to run our business,. Rates, land tax, utilities, electricity, state and federal government regulations and others. These are all costs we need to pass to our tenants. Making it harder to landowners makes it harder for all business to operate effectively.

The following comparison can be made , the Landowner is like a trucking company, without trucks good cannot be delivered and supplies and business would ground to a halt. Without landowners business and employment will ground to a halt.

Please design a system that is fair and reasonable and not dictated by the flavour of the month or agitation by activists who focus on micro outcomes.

Yours sincerely



Phillip Rizzo

Director Ponticello Properties Pty Ltd

