

23 June 2025
Our Ref: A6586822

To: Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
Sydney NSW 1240

Lodged as an online submission
water@ipart.nsw.gov.au

Dear Tribunal

IPART Draft Report Review of prices for Sydney Water Corporation

Fairfield Council appreciates the opportunity to respond to IPART's Draft Report on the Sydney Water pricing proposal for the period 1 July 2025 to 30 June 2030.

While we acknowledge the draft pricing determination seeks to balance affordability with service delivery, Fairfield Council is particularly concerned that the decision may lead to inadequate capital and operational funding to meet future population growth in the LGA.

Council's concerns are centred around the Department of Planning, Housing and Infrastructure's (DPHI) housing targets and completions data upon which infrastructure planning is based. This data does not include secondary dwellings which make up the majority of Fairfield LGA's new housing stock.

Over the past eight years (to June 2024) secondary dwellings, introduced by the State government via a blanket policy, have accounted for 57% (3,322) of total completions in the Fairfield LGA. This is the highest number and proportion of any LGA in NSW.

The exclusion of these dwellings from completions data means that infrastructure delivery agencies are significantly underestimating the demand for services such as water and sewage in Fairfield LGA. Recent meetings between Sydney Water and Council have found this to be the case with the former reporting higher than forecast demand in the LGA.

Council has consistently raised with the DPHI the issue of its data neglecting to count secondary dwelling completions, and the significant impact that this has on the:

- Housing (and associated population) growth data that informs infrastructure planning for State agencies including education, health and transport, and the

- infrastructure priorities for expenditure of the State governments Housing and Productivity Contributions (“HPC”).
- Achievement of housing targets set by the DPHI’s, including the current five-year housing target of 5,900 additional dwellings by 2029.

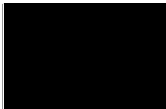
Accordingly, Council believes that the pricing decision under the current IPART Review is based on incorrect dwelling and population data and may therefore worsen an already chronic underservicing problem for the most disadvantaged community in metropolitan Sydney.

More generally, Council believes there needs to be less reliance on the costs of new infrastructure being placed on existing communities and greater consideration needs to be given to the inflationary effects of increased user charges.

Council also queries how the pricing determinations balances the need between new and renewal capital infrastructure. Specifically, is the pressure to complete infrastructure for new housing supply in greenfield locations compromising existing infrastructure and the level/frequency of service disruption for existing users?

If you have any questions regarding this submission, please contact Marcus Rowan, Manager Strategic Land Use Planning on [REDACTED]

Yours sincerely



Andrew Woodley
Director City Planning