Submission by Alan Smedley of regarding the "Review of Central Coast Council's prices for water, sewerage and related services" 10-10-2018

The Central Coast Council proposed rate changes for large land holding is totally ill-considered and unjustified.

We reside in an area with no Council water, sewage or drainage services on acres in a rugged hinterland valley with land where the topology makes it barely able to commercially generate income enough to meet the current rate charges, let alone any improvements and will make it totally unviable for us and for many residents to remain in the area.

Many people living in this area have moved from the city and are elderly, have retired and receive limited income.

As Land Holders we are obliged to maintain and manage the environment we own and reside in as a part of our occupancy certification and compliance.

The claim by the Council in the statement on the proposal on page 7 and in section 1.3 is quite clearly incorrect. It says "Council has proposed changes to the way the stormwater drainage charges are implemented. Under this proposal, all rateable properties will pay for stormwater drainage, as the whole community benefits from stormwater drainage infrastructure."

Is this proposal an attempt to charge us as local land holders for the water from the sky, that passes through our land and runs off to the local creeks and the Wyong River. The river that the Council then take that same water further down the river to service their own customers for a fee.

This following statement is also not financially or logistically achievable as the cost of Infrastructure to achieve this in the terrain of the hinterland would negate any value.

"To enable the proposed change, Council will need to apply to the NSW Minster for Water to have the whole of the Central Coast LGA declared a Drainage Area under the Water Management Act 2000. This will include an application for all properties west of the M1 in the former Wyong LGA. This proposal would see all customers in the former Wyong LGA that are not included in the current designated Drainage Area required to pay the proposed stormwater drainage charge."

As stated above the Council do not provide us with any water supply, sewage or with infrastructure to manage or treat our own water, or infrastructure to put our water into the river upstream of their water catchment point.

The proposal discusses very extensively expenditure on water supply, water treatment, storm water and sewage systems extensively but at virtually no point is there mention of those with their own water collection, treatment and septic system that are all implemented at the land holders' own cost. Systems that are regulated by council and or the State for a license fee to operate, yet no contribution is made toward the cost of these facilities by the Licensor.

To properly manage the requirements imposed as the Land Holder in any environmental or conservation zoning imposed by the State or the Council in any sort of sustainable way the property must be able to produce income to meet those costs.

Does this make it a business?

Does a Home Office of a small business owner make what is otherwise a Low Impact Property get reclassified as a business?

What hurdles and red tape must a land holder like us or any other a farm property owner clear to get their property classified as low impact?

There is no clear indication in the proposed changes to identify how or what methods or criteria the Council will use to classify a business as against a residence.

How does a Westfield or a Bunnings site equate with a low impact property farm like ours?

Furthermore, local community members have been advised by Council staff that obtaining the Low Impact classification will be almost impossible!!

In section 1.10 of the Council proposal community engagement is mentioned; the Council have all our address details including email and phone contacts as land holders and rate payers but at no time did we receive any communication or notice of any of the so-called engagements activities of information regarding these proposals. Nor has there been any engagement or discussion with the community about this matter.

How will the numerous weekender dwellings and non-resident owners on acreage in our hinterland valley be impacted, properties that would quite obviously not be viable as an enterprise be affected by this proposal?

The proposal lists non-residents as being required to pay this new Levey. So even if currently listed on their rate notice zone as residential this new charge could be applied. Given the propensity of Council to change its words and their meaning without notice, e.g. "rural residential" to "residential", what security do we have that it will not change the terms or interpretation again?

The Council contribute nothing to the costs we bear of maintaining the environment whereas the NSW Local Land Services who charge us as land holders a far lesser fee while contributing extensively to all rural communities' state wide.

Based on historical information provided by others I am led to believe that over the last ten years that rate increases for this region have amounted to an average of over 9.8% whereas the Australian Bureau of Statistics CPI increases for the same period have averaged only 2.23% and are currently lower at just 2,1%. How can our local council justify what is potentially going to be a doubling of the current costings for a drainage levy? I strongly believe this, and any increase is totally unjustified particularly when almost all residents west of the MI have no drainage infrastructure, kerbing and guttering or town water and are low impact. It most certainly feels like gauging when we don't have access to amenities

Perhaps land and water rates should not be tied directly to just the CPI but should reflect fluctuating land values.

Increases that are more than four times CPI over a ten-year period must be questioned, and particularly when they have applied to an area with limited and few Council services. If it is necessary to tie rates to anything it should be the land value alone particularly in the case of rural land.

I know of several instance of Land Rate increases that have been successfully challenged.

The proposed rating changes may be appropriate in an urban or inner-city region but are totally inappropriate to a remote and rugged rural area such as this.

A direct comparison of urban and rural values compared to rates and charges would be of interest and should be considered.

Alan Smedley