Acting Senior Manager Roads Transport and Draining.

My husband and I	) own in partnership with	ı

We would like you to bring to the Central Coast Council's attention several shortfalls in managing the process of communicating to customers in the region the proposed submission to IPART and changes to stormwater drainage charges.

Firstly, the Council's letter to us was dated 8<sup>th</sup> October 2018 and addressed to our resident farm address outside . Mail between the Central Coast and the Central West usually takes 3 to 4 days and we were lucky to receive it late Friday 12<sup>th</sup>. Too late to read all the relevant material and make a submission. And your office phones were engaged for the hour prior to 5pm and the IPART website to which we were referred was down. This indicates a level of incompetence and lack of planning on behalf of the Council staff and as a rate payer, I expect better of the combined council.

Secondly on speaking with IPART I have formed the strong impression that the Council hasn't followed due process in hastily announcing their pricing proposals and again would like to think they are intelligent enough to seek more informed counsel and planning advice.

Subsequently I have tried over three days to speak to you personally, but finally gave up this morning. I know you would be a busy man but I wanted to have a definition of the Low Impact Ratepayer category before writing a submission. So I will simply put forward our case and response to the Council's pricing proposal.

When we purchased our first property in 1997 (	) on Mangrove Mountain,	
Gosford Council had a plan for the Somersby Pla	teau that required landowners/farmers to	
be aware of the natural beauty of the area and t	he future benefit that tourism might bring	
to the Coastal/Plateau communities if conservation practices were honoured. We		
established an alpaca stud, utilizing low stocking	rates/chemical impact and sustainable	
farming practices and purchased the	as our stud expanded. Cape	
weed, fire weed and crofton weed was eradicated, 25 acres which we owned at the back of		
the properties ( ) wa	as cared for but not farmed as an	
environmental corridor, to eliminate any adverse	e run off from our farm and those	
neighbours abutting the creek. And to provide n	atural flora and fauna refuge.	

Not only did we have the one of the most successful alpaca studs in NSW, we were complimented on having one of the most beautiful farms on the Mountain.

In early 2006 we moved our huacaya alpaca herd (150 head) to Orange seeking a cooler climate as their fibre density improved. We live at the Orange farm and manage it. Our suri alpaca herd (150 head) remained at Mangrove Mountain to become the most awarded suri

fleece herd in Australia. With the reduced stock numbers, was sold and the suri stud has since only operated out of Significant infrastructure commensurate, with a professional livestock breeding operation, . There is a constantly maintained spring fed dam at the was installed at bottom (middle east) of the farm from which water is pumped to high side (west) tanks for storage for a gravity fed stock watering system. Another dam is midway down the fall of the property on the north side. The main house, farm worker's cottage, American barn, machinery shed all have rainwater collection tanks. Our paddocks are constantly maintained for weeds – hand hoed or pulled, manure piles are vacuumed and mulched then aged and spread. Ph levels are monitored and rectified with natural calcium products. Any reseeding is direct drilled, rank pasture is mulched such that there is no turning of the soil anywhere on the property. Drainage from the top side of the property is directed along grassed stormwater spoon drains to the main dams or naturally fans following the gentle contours of the property. Having farmed with these farm environmental management practices, we resent the implication that we are in any way contributing to the degradation of the beautiful Plateau. I think you should be looking at the unabated industrial developments and the concrete jungle spreading along the coastal fringe of the Council area where stormwater drainage is a serious issue in many residential and industrial areas. On the financial side, a \$4000 rates hike will mean that our family that farm Road will \$4000 worse off as these charges come out of the farm income. Farmers don't make a lot of money anyway and our young family that manage the stud work 7 days a week to keep the business afloat (and that includes the input of their teenage children). I attach their submission below to give you an idea of how younger residents see the issues and it will be sent as a separate submission to IPART. Please seriously consider the impact of what the Council is proposing and consult in future with the landholders. Yours sincerely,

Dear Mr Spare,

Thank you for the invitation to residents for comment on Central Coast Council's (Council) submission to The Independent Pricing and Regulatory Tribunal (IPART).

Our family lives on a property that has "the potential to be significantly impacted by the proposed storm water drainage charges". As this property is greater than 45,000sqm (sitting on 45.31 hectares) the proposed storm water drainage charges will increase from \$124.68 per annum to \$5,427.81. This outrageous increase of 4,353% would have much more than a significant impact. It has already caused undue stress considering the nature of the increase as well as the way it has been delivered, being a notice in the mail three days prior to the closing of public comment to IPART.

I would like to state that Council does not supply this property, water, sewerage or storm water services. We:

- are self-sufficient in harvesting rain water
- have our own sewerage treatment, and
- appropriately deal with our stormwater through on farm facilities which include;
- two large dams
- water tanks
- minimal impervious surfaces
- a large portion of this property, 24 hectares, is untouched dense vegetation that Popran Creek flows through
- we do not have trade waste

All the "stormwater" or "environmental water" as it sustains the creek/river system, replenishes the water table and restores our water supplies is very well managed on this property. It is either harvested into water tanks, directed into dams or ends up in the ground water. With this in mind I can only assume this property would be applicable for the low impact rate, though that is only an assumption as your letter states that is to "be assessed following application to Council".

I would like to make note of the poor public relations on part of the council. Sending out a generic style letter with only an Assessment Number, no names and only three days prior to the original deadline for comment is unacceptable. This in no way fits with Council's "Good Governance and Great Partnership" aspirations nor its core value of collaboration. It has caused undue stress and worry for many people in the region. I question why there has been no prior notices in the mail or the local "Community News".

The Council is "proposing to harmonise the price it charges to customers". Where is the harmony in one land holder of 40 hectares on residential rates, paying a stormwater drainage charge of \$110.77 per annum, while his neighbour also a land holder of 40 hectares but on non-residential rates paying a \$5,427.81 per annum fee?

I would strongly disagree with the council that it is "considered a fairer approach as the volume of stormwater generated by a property is more closely related to the land size rather than the size of the water meter". I believe that stormwater is more closely related to urban areas than well managed rural properties. This is due to the nature of the urban environment and its impervious surfaces such as roofs, roads and pavements replacing areas of vegetated growth. The stormwater runoff increases as the urban environment grows. Whereas the majority of rural properties must put into place "stormwater" drainage systems to supply themselves with water for personal, agricultural and horticultural use which is taken very seriously, especially in these ever changing climatic conditions.

Summing up, Council's proposal has been very poorly delivered. It did not duly notify residents that will suffer extreme financial ramifications, allowing them time to respond effectively. Our property is not provided with water, sewerage or stormwater services and we have our own "stormwater" management plan on the farm. Our "stormwater" does not impact on the council other than replenishing the very valuable ground water supply. This proposal does not explain its reason for the increase other than being "fairer" nor does it justify it. For these reasons, we strongly oppose council's proposal.

Regards,

The residents