

15 October 2018

Yarramalong, NSW 2259

IPART

To whom it may concern,

RE: Review of Central Coast Council's prices from 1 July 2019.

Re; Stormwater Drainage Services

As a resident and ratepayer of Central Coast LGA, I request that IPART reject the Central Coast Council (CCC) submission for review of prices from 1 July 2019.

CCC is proposing a new charge for storm water drainage on residents west of the M1 (previous Wyong LGA) and a change of pricing for former Gosford LGA residents.

Central Coast Council has failed to adequately notify/consult/discuss this new proposal with affected rate payers.

The CCC submission before IPART has a proposed fee of up to \$5,427.81 per non-residential property for storm water pricing. Prior to amalgamation there was no charge for Wyong LGA properties west of the M1 freeway and a flat charge of \$124.68 for former Gosford LGA properties.

I only became aware of this on Sat 29th Sept when council held a "community information session" at Alison Homestead (east of the M1) on the Saturday of the long weekend at the beginning of the school holidays. The only notification for this session being a poster displayed in the local shop window a few days before (copy of poster attached). There was no such advice or information provided to the residents of Dooralong Valley and Mangrove Mountain and Districts.

The majority of affected residents only heard about this proposal after the 29th Sept by word of mouth and local social media.

7th Sept 2018 council submits summary to IPART

29th Sept 2018 council holds information session.

12th Oct 2018 public submissions to IPART closed (extended to 19th Oct after residents appeal to IPART)

There has been NO community consultation with affected residents.

No advertisements in our local paper. (The Grapevine)

No advertisements in Mangrove Mountain and Districts Community News.

No mention in the CCC Coast Connect Quarterly mailed out with our rates.

Why did Council after months of preparation and 4 weeks after lodging its submission to IPART then decide to notify the "significantly impacted" properties only days before submissions for public comment closed? (copy of letter attached)

No such letters of advice were sent to all the other residential properties about to incur a new charge (previous Wyong LGA west of M1).

I suspect there may still be many residential rate payers west of the M1 who remain completely unaware of the proposed storm water charges.

I believe it was CCC's intention to keep affected property owners west of the M1 uninformed.

Our non-residential property has been identified as having the potential to be "*significantly impacted*" by the proposed stormwater drainage. No previous charge to \$5,427.

Apparently we can apply for a "*low impact rate, of \$110.77 per year, which will be assessed following application to council*" however there has been no definitive information from CCC

as to how properties are to be assessed as “low impact”. This is concerning as it provides no criteria, examples, models or definitions and could be open to misinterpretation and change without notice.

The majority of rate payers across the shire will receive a slight reduction in their stormwater rates, however this will come at the extreme cost to primary producers.

This is not an equitable stormwater price proposal as it targets properties on Farmland Rates while residential rated properties of exactly the same size will only have to pay \$110.77. The proposed fee is in direct and absolute conflict to the Central Coast Regional Plan 2036 (ref. Goal 2, Direction 8/9) which outlines the importance of agriculture to the Central Coast economy.

We live on our “non-residential” rated property, 22kms west of the M1. This is our home. As a resident of the shire I believe this proposal would be discriminatory to charge other property owners a lower residential rate than would apply to the land on which we reside. We are not connected to town water.

We are not connected to a sewerage system.

We are not connected to a storm water drainage system.

We pay for our own infrastructure and manage and maintain these at our own cost (as well as paying council an annual septic license fee)

Why should we pay for a service that we are not connected to?

The proposed charges are to align rates between the former Wyong and Gosford LGA's.

How is going from no rate or a flat rate of \$124.68 to \$5427.81 aligning rates?

CCC has not demonstrated any increased efficiencies or minimisation of costs since amalgamation.

We believe the proposed stormwater charge is unjust, unfair and inequitable by expecting a small number of ratepayers to incur severe financial impost for a service they are not even connected to so the majority of ratepayers east of the M1 can enjoy a reduction of rates.

And yet,

According to the CCC submission the price change “*will only come into effect if the entire Central Coast LGA is declared a drainage area*”

Surely this declaration process should have happened before the pricing submission was even considered? Is this not putting the cart before the horse? As residents living in a water catchment area and flood zone we should be afforded the opportunity to have input into this process as well.

I completely object to the CCC prices submission and ask that IPART reject the proposal and that CCC waits until it has had an answer from the appropriate Minister in regard to what constitutes the CC LGA Drainage Area.

I believe the Central Coast Council submission should be rejected as:

- It is inequitable and unjust, and
- CCC utterly failed to adequately notify and consult with all affected property owners.

8 October 2018

Central
Coast
Council

The Resident

YARRAMALONG NSW 2259

Dear Sir / Madam,

Assessment No:

YARRAMALONG NSW 2259

Council's submission to the Independent Pricing and Regulatory Tribunal (IPART) was lodged on 7 September 2018. IPART is the regulatory body responsible for setting prices for water supply, sewerage services and stormwater drainage on the Central Coast.

Central Coast Council is proposing to harmonise the prices it charges customers to ensure the costs of delivering water, sewerage and stormwater drainage services are consistent across the Central Coast. In relation to stormwater drainage, Council is proposing that:

- the residential stormwater drainage charge is reduced to \$110.77 per year
- **non-residential stormwater drainage charges will be based on land size ranging from \$110.77 for a non-residential property under 1,000 square metres to \$5,427 for a non-residential property greater than 45,000 square metres**
- **a non-residential Low Impact rate is available by customer application and assessment by Council**
- all rateable properties be levied the Stormwater Drainage Charge

Based on the proposed pricing framework, your non-residential property has been identified as having the potential to be significantly impacted by the proposed stormwater drainage charges. Refer to the table over the page containing the charges applicable to your property.

Currently, non-residential customers in the former Gosford Council have a flat rate charge of \$124.68 per year whereas non-residential customers in the former Wyong Council have a water meter based charge ranging from zero to \$12,832.09. This means that there is an overall difference in the way customers are charged for stormwater.

Council's proposal includes a non-residential stormwater drainage charge applied based on land size. This 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.



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The proposal also includes a non-residential Low Impact rate of \$110.77 per year, which will be assessed following application to Council. The application process will consider the amount of built areas compared to natural areas and take into account on-site stormwater management measures including detention storages, rainwater tanks and farm-dams as well as stormwater treatment options such as vegetated swales.

Preliminary investigations indicate that many Farmland customers may be eligible for a Low Impact rate given the undeveloped nature of their properties and widespread use of farm dams. Council is currently undertaking a review of all Farmland properties with a view to streamlining the Low Impact assessment process for these customers.

IPART have invited public comment regarding the proposal by 12 October 2018. For information on further opportunities to have your say or to provide a submission, visit: www.ipart.nsw.gov.au/Home/Industries/Water/Reviews/Metro-Pricing/Prices-for-Central-Coast-Council-from-1-July-2019

Should you have any concerns regarding the IPART submission process or the due date for public comment, please contact IPART's Anthony Rush by telephoning (02) 9113-7790 or Elina Gilbourn by telephoning (02) 9113-7788.

Yours faithfully

A black rectangular box redacting the signature of Jay Spare.

Jay Spare
Acting Senior Manager Roads Transport and Drainage



Community information session Proposed changes to stormwater pricing

Central Coast Council has recently lodged its submission to the current review of water, sewerage and stormwater drainage prices for the Central Coast. The review is being conducted by the Independent Pricing and Regulatory Tribunal (IPART).

Council's submission proposes some changes to stormwater drainage charges for residents and businesses west of the M1 in the former Wyong Local Government Area.

Council is holding a drop in session to answer your questions about the proposed changes. Please drop in any time between 10am – 12pm to have your questions answered.

Alison Homestead
1 Cape Rd, Wyong
Saturday 29 September 2018
10am – 12pm

For more information on the proposed changes, a copy of the submission summary, the full submission and links to the IPART website for your opportunity to have your say visit yourvoiceourcoast.com.au/waterpricing