

Yarramalong, NSW

23rd April 2019.

IPART: Review of Central Coast Council's water, sewerage and stormwater prices

DRAFT REPORT.

RE: Stormwater pricing draft recommendations, as applied to properties west of the M1 in former Wyong LGA

I would like to acknowledge IPART's recognition of stakeholder's submissions re council's proposals and agree completely "*that Council take steps to improve engagement with its customers*".

I thank IPART for agreeing with stakeholders that CCC "*could not levy stormwater charges on properties west of the M1 unless the Minister declares this area a drainage area under the Water Management Act 2000*".

However I disagree with IPART's draft proposal that these same stakeholders be subject to a stormwater levy if this area is declared a drainage area.

In line with IPART's draft decisions Sect 10.4 Prices for unconnected properties

"Properties not connected to the water or sewerage system should not pay water or sewerage charges as they are not directly imposing costs on the Council's network."

Properties west of the M1 are NOT connected to a storm water system. Stakeholders collect and manage stormwater at their own cost.

Council described the service it provides in rural areas "*to divert water away from the road to reduce flooding*", surely this falls under road infrastructure funding.

IPART asks: Should stormwater services be funded through general rates?

No. Properties of a higher land value would pay more for exactly the same service.

How would council differentiate between properties in a declared drainage area to those which are not if the levy was funded through general rates?

If funded through general rates Council could apply for a special rate variation to fund these costs. Previously IPART approved a 6.9% rate increase over several years. For property owners west of the M1 our rates increased by 37.72% in the 2014/15 year. We remain wary of all council submissions to IPART, especially for a SRV.

In summary, irrespective of whether The Minister declares the area west of the M1 a drainage area, I believe affected stakeholders should NOT have to pay a stormwater levy for a service they are NOT connected to.

Sincerely,

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