Hi,

We attempted to submit via the online form however it returned an error so please find my submission below. Please note that I provide my permission to publish my submission and name on the IPART website.

is a functional horticultural farm, 16 hectares in area, supporting 2000 citrus trees and 3 hectares of vegetable production. The farm was established in 1936. All storm water is managed on the property through:

- a series of dams and manmade drainage channels,
- absorption through the soil back into the water table,
- retention in a large area of remnant native bushland.

Council provides no storm water services to my property. Conversely, I manage some storm water discharged from the council managed Wisemans Ferry Road through my management system. My property is greater than 45,000 sqm thus based on the proposal we may be liable for a yearly Stormwater drainage charge of \$5,427.81. This is an annual increase of \$5,299.49. Such a large increase would create severe ongoing financial hardship.

We note the proposed exemption for non-residential Low Impact rate of \$110.77. Given the rural enterprise conducted on my property our expectation is that we would qualify for this exemption. However the proposal lacks sufficient detail to alleviate our concerns regarding the eligibility for exemption and how this process works in the long-term.

Our points of concerns for the proposed Low Impact rate exemption are:

- 1. What is the exact criteria to be accessed?
- 2. Is there an independent arbitration system in place to challenge any adverse ruling?
- 3. Does Council have the requisite skilled resources to properly assess stormwater management on rural properties? Note there is no longer a NSW Soil Conservation officer based in the area.
- 4. How often must a rural land owner apply for the exemption? Is it annual or a one-off process?
- 5. Is there any cost involved in applying for the exemption?
- 6. What is the longevity of the exemption process and can it be eliminated without IPART approval?

Yours Sincerely Reginald J. Bennett OAM