Motona Pty Ltd ABN 48 001 647 936 as Trustee for Paul J Cumming Family Trust ABN 41 053 778 814 Trading as:

Paul J. Cumming and Associates Residential Property Developers

11th October 2018

Chief Executive Officer IPART SYDNEY

Email: ipart@ipart.nsw.gov.au

SUBMISSION

REVIEW of Central Coast Councils prices for water, sewerage and related services from 1ST JULY 2019.

The current 2013 Determination uses a fixed service charge per dwelling for Residential properties and a meter-based charge for other dwellings which are classified as non-residential such as Manufactured Home Parks and Boarding Houses.

Retirement Villages are charged on the meter size, then adjusted down because they are a Retirement Village. This method is complicated and inequitable to other Residential users of water and sewerage services.

IPART has previously advised me that properties containing multi-dwellings were charged using the meter size method. However, as a result of the 2013 Determination, properties containing multi-dwellings will now be charged per dwelling rather than the meter size and "IPART made this change in an effort to improve equity between customers and so that customers imposing similar costs on the system pay similar prices".

It is apparent that this was not achieved in the 2013 Determination.

SUBJECT PROPERTY

Our property known as 72 Koolang Road Green Point, consists of 39 dwellings situated on a large site of 19390 square metres (1.939 hectares). It was developed in

1984 by our Family Company for the sole purpose of providing Residential long-term rental accommodation to tenants.

It is still owned by our Company and has operated for 34 years.

GENERAL COMMENTS

I consider that there are basically two types of Residential Properties.

- a) dwellings which are owned individually and either owner occupied or rented.
- b) properties which comprise several dwellings and are owned wholly by one owner and provide accommodation to others such as Retirement Villages, Manufactured Home Parks or other properties which contain a number of dwellings which are occupied by persons other than the owner of the property as a whole. In Summary all (b) above are providing accommodation for people who are paying some form of rent.

To illustrate the huge variation in water and sewerage service charges resulting from the 2013 Determination, listed below are four types of Residential Properties, all of which provide accommodation for people, other than the owner of the property.

1. **Retirement Village** – Alloura Waters at Davistown.

204 Dwellings

Water/sewerage service charge 2016/2017

\$36531.82

Shows \$179.00 per dwelling

Method - Meter size less deduction.

2. Manufactured Home Park - Broadlands Estate Green Point.

300 Dwellings

Water/sewerage service charge for 2016

\$33433.00

Shows \$111.44 per dwelling

There may be a Sewerage usage charge on this property Which would result in a figure of approximately \$200.00 per dwelling.

Method - meter size.

3. **Boarding house** – Advertised as Apartments.

65A and 65B Webb Street East Gosford.

30 Apartments

Water and Sewerage Service charge for 2018

\$9379.86

Shows \$312.66 per dwelling

Method – meter size.

4. <u>Subject Property</u> – 72 Koolang Road Green Point.

39 Dwellings all for rental.

Water and sewerage service charges 2016

\$31772.00

Shows \$814.00 per dwelling

Method – charge levied on number of dwellings.

The inequity created by the 2013 Determination if obvious.

OUR SUBMISSION

Residential Properties

All Houses, Flats, Units, Town Houses, Villas, Apartments, Boarding Houses which have kitchen and bathing facilities, Retirement Villages, Manufactured Home Parks, should have water and sewerage service charges levied on a per dwelling basis.

A discount could then be applied to properties such as 1, 2 and 3 above and properties similar to 4 provided they have a minimum of say 20 dwellings, all of which are available for permanent rental.

The discount would be to reflect the fact that the properties are providing accommodation for long-term rental to tenants.

It is considered that the above method of dealing with different types of Residential properties would be less complicated, would be more equitable and would be transparent.

The alternative is to charge each and every dwelling the same water and sewerage service charge.

MOTONA PTY LTD.

Paul Cumming

Company Secretary.