



Central Coast Branch  
Chair: Tim Kemp



### **Independent Pricing and Regulatory Tribunal**

**PO Box K35 Haymarket Post Shop NSW 1240**

Dear Independent Pricing and Regulatory Tribunal,

On behalf of the NSW Farmers Central Coast Branch and its members, I submit this response to the *WATER METRO PRICING-Prices for Central Coast Council from 1 July 2019 Review*.

NSW Farmers Central Coast branch represents a large proportion of farmers and primary producers on the Central Coast Plateau, and generally welcomes the draft report.

NSW Farmers Central Coast Branch pays particular acknowledgement to the proposal to recommend a flat rate charge for farmland storm water of \$105.11.

However, members have expressed a concern in relation to section 9.4.3 in the draft report

Contrary to the third paragraph of this section, there seems to be a definite lack of clarity with regard to declared drainage areas.

While it is understood that Central Coast Council is not presently progressing an application to the relevant Minister to have the area west of the M1 declared a drainage area, there is scope for this to occur after the final determination from IPART.

Any changes to the currently declared 'drainage area' which at present does not stretch any further west of the M1 highway would allow Central Coast Council to charge storm water levies in the future with no apparent oversight from IPART. This would have the effect of sidelining IPART with regard to, what is, in members views, one of the most contentious parts of the whole Central Coast Council submission into the above Review.

This is a real concern to farmers in this area.

It would seem that if the minister declares the area to the West of the M1 Highway a declared "Drainage Area" this would allow council the freedom to increase the IPART-Suggested Levy to whatever it sees fit, without any external oversight. Oversight, that has been, and should remain critical to ensuring that farmers are not bearing the cost of a problem that is not of their creation, as noted in IPART's own preliminary view according to the Fact Sheet that forms part of the timeline of this Review.

I would welcome any feedback on this submission that you may have.

Kind Regards,

Tim Kemp,

Chair

NSW Farmers Central Coast Branch.