

11 October 2018

Independent Pricing and Regulatory Tribunal

PO Box K35

Haymarket Post Shop

NSW 1240

Via e-mail [www.ipart.nsw.gov.au/Home/Consumer Information/Lodge a submission](http://www.ipart.nsw.gov.au/Home/Consumer%20Information/Lodge%20a%20submission)

Central Coast Council price review 2019

Thank you for the opportunity to make a submission to IPART regarding the review of Central Coast Council's prices for water, sewage and related services.

We are owners of a rural property located at the above address, the property has no council provided services for water, sewage or drainage. We do however pay fees to Central Coast Council for the right to operate our own provided, run and maintained on-site sewage system hence our comments relate to stormwater drainage pricing.

We have reviewed the matter and the issues paper and make the following comments:

We understand that

The previous Gosford Council had a stormwater charge as a line item its rate structure and that the previous Wyong council did not. In the case of Wyong's (missing) line item this fee, if deemed by council to provide a service (there is no infrastructure provided) would have been included within Wyong Councils pre-existing charges.

The new Central Coast Council, in its submission to IPART and to the NSW Government has proposed declaration of a stormwater area(s) within its jurisdiction and a common stormwater charge for all rate payers, the quantum of which is proposed to be \$100 for a residential customer.

Specific commentary on the issues paper includes

There is no clear definition of residential property, I presume this is a place where a person lives but does not conduct a business, this needs to be understood in the terms of any stormwater charge that may arise.

Most of Yarramalong Valley and most adjoining rural properties do not fit the description of residential in the discussion paper, as mentioned these places typically are not provided with water or sewage services by council. Most of these properties do not have any council provided stormwater services/infrastructure such as curbs and gutters, detention arrangements or similar.

It is arguable that most of the rural properties are already low impact due to their size where water is captured on the ground, in tanks or dams or in many cases where stormwater run-off flows directly into Wyong River or its tributaries.

Our specific response to the questions raised (in the Issues paper) relevant to stormwater are as follows

Should the Council's stormwater prices be based on the area of a customer's property?

There should be no stormwater pricing for rural residential properties, there are no (or very limited) services (infrastructure or maintenance thereof) for rural residents in any case.

Further, any stormwater charge must not be levied on the size of rural residential land, as mentioned these are low/no impact situations and to differentiate and assess one property situation to another would seem an unnecessary administrative burden, therefore a single fee should apply should any charge ultimately arise.

If for reasons of standardisation a stormwater charge is to be applied to rural residential land in the previous Wyong council zone this must not be an **extra** charge as this is already being paid but is not listed as a line item charge.

Are the Council's proposed stormwater charges reasonable?

Please see above comments, these are already being paid in existing charges. The notional value of \$100 is irrelevant, however it would be satisfactory to express this value as a line item as opposed to any (net) extra charge.

Should there be a low impact customer category for stormwater drainage prices? If so;

- *Should a low impact customer price be available to both residential and non-residential customers?*
- *What should the low impact price be compared to other stormwater prices?*

Please see above comments on charging. Should a stormwater drainage price ultimately be applied low impact ratings should apply to both residential and non-residential customers, this provides incentive to be a low impact user.

The low impact price should be consistent with current Sydney Water low impact rates.

Thank you for the opportunity to comment on the above.

We look forward to further to the next round of consultation on this matter.

Please contact me on [REDACTED] if I can provide further clarification or information on this response.

Yours Faithfully

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[REDACTED]