



24th October 2019

IPART

Prices for Sydney Water Corporation from 1 July 2020

With regard to Sydney Water's Developer Direct (SWDD), from a Water Servicing Coordinators (WSC) perspective it appears that Sydney Water (SW) is in direct competition with its own WSC's

This reduces to number of projects available to the WSC's. The WSC industry is available to service the development industry. The WSC's cannot create further developments to provide its services to, the WSC's can only trim its business resources to suit the demand available.

For a WSC to grow or increase its business size it can only take customers from another WSC's. If that occurs as a decision of the developer that's fair, but to actively seek and market your services as better or able to get approvals faster than another WSC, is not ethical. For we all (WSC's) follow the same process and procedures and should deliver the same result.

Sydney Water requires the WSC's to maintain a Quality System, Environmental system, Professional Indemnity insurance Extensive on the job training for staff and key persons, Formal training etc. We as WSC's are required to provide developers with Sydney Water's information and processes, information that effect their development. At times this can be at length as some developers try to tailor their work to meet the least of SW's requirements. All the above forms an overhead that requires the WSC to fund from the business fees charged. SW may not have these overheads applicable to its SWDD business and are not built into the fee structure for that service. Therefore, SW has an unfair advantage in competing with its WSC's.

The way to reduce the cost of a small developer obtaining a S73 certificate may well be the following:

SW can make its policies and procedures more streamlined, able to be understood easily, written in plain English

- SW's decisions need to be consistent, always. Have a common sense approach.
- SW may be able to reduce the overheads and compliance costs placed upon the WSC's

For SW to take a position in the market place and a percentage of work away from the WSC and undertake that work below industry cost doesn't provide any long-term benefit to the development or the WSC industry.

Should you have any enquiries, please do not hesitate to contact one of our Case Administrators

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Yours faithfully

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