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IPART

Review of Central Coast Council's prices

Submission

Key Issue

**The Council's proposed prices.**

Are the Council's proposed price changes reasonable? Would they have any undue impact on any customer groups?

NO the stormwater drainage non-residential properties charges are not reasonable.

Properties in this category are going to be changed to be charged using a land size approach in the former Wyong LGA. It is stated in the CCC proposal "approximately 400 customers will receive an increase in this charge." And "Stormwater drainage charges for non-residential customers will be introduced for customers that are not included in the current designated Drainage Area for former Wyong LGA."

I argue this is not reasonable as it includes farms and primary producers in the Wyong LGA. The classification of properties as large at over 10,001 m2 proposed charge of \$1716.96 increased from zero and "very large" properties at over 45000 m2 which is only over 11 acres charge of \$5427.81 is definitely not reasonable. Indeed, if these charges are imposed on the drought affected farms of the Central Coast it may render them non viable and ruin their business.

YES these charges will have an undue impact on the farming and rural businesses group of non residential properties. In Wyong LGA these properties have not been subject to any stormwater charges in the past. The 2000 properties in the Gosford area are going to be subjected to an increase to \$1717.96 or \$5424.81 from the former Gosford LGA rate of \$124.68. Yes this will have an impact on these ratepayers.

It should be noted that the ratepayers of the valleys, be they residential or non-residential, do not have access to the four basic business products of Council's Water and Sewer functions

- Harvesting raw water
- Drinking water
- Collecting sewerage
- Recycling treated water

These customers have tank water, septic and manage their own properties in the event of stormwater. We also have no meters as we harvest our own water. However, in this proposal these properties have to pay the cost of these services at a rate of 15% or 49% higher then the neighbouring property which is classified as a residential property even though it is acreage.

**Aligning prices between the Gosford and Wyong areas**

Should stormwater drainage prices be aligned across the Council's area? Why or why not?

No they should not if it means non-residential properties are targeted and forced to pay exorbitant rates at the expense of the residential properties. Lets be clear about this, if you have a farm which is primary production and classified as “farmland” by Council, as we have, we will be charged the new charges (\$5,427.81) but if our neighbour has a “very large” property but is not rated as “farmland” they will only be charged the residential charge of \$110.77 in this proposal. This is not aligning prices between the Gosford and Wyong areas and is discrimination.

I question the proposal to reduce the rates of the residential properties at the expense of a small number of properties classified as Medium, Large or Very Large as per Table 2 Proposed Charges. This is clearly a case of cross subsidising residential properties for stormwater and drainage. The savings are minimal and I suggest the current rate of \$128.32 be applied to all residential. As we receive the stormwater drainage from 5 neighbouring properties including the State Forest we and we manage it at our own cost, we should not be paying any stormwater drainage charges at all. This would be a fair and reasonable solution in my opinion.

### **Stormwater drainage prices**

Should the Council’s stormwater prices be based on the area of a customer’s property? Why or why not? Should there be a low impact customer category for stormwater drainage prices?

As I have said earlier, NO, prices should not be based on the area of a ratepayer’s property. It is unfair as this would NOT increase cost-reflectivity as farmland and primary producers charges are unreasonable and would have a huge impact on the farming business community. Indeed this charge could result in businesses going out of business as the rates charged are already huge.

Why have a low impact customer category when Gosford LGA has operated on a standard price for stormwater services and this method could be adopted for the amalgamated Council. It would be much fairer and not necessitate farms and other businesses having to apply for a low impact status. Further more, there are no details on what a low impact property is or how and when the status would be established leaving non residential properties threatened with this charge without any transparency or consultation.

### **Community engagement**

Council claim, in their proposal, that they have undertaken extensive community engagement. However, at no point have the properties which will be impacted by the massive increases of stormwater drainage charges been contacted. They identify 400 in the Wyong LGA but we have not received any clear notice that our farmland property will be subject to the charges for a non-residential Stormwater drainage charge of \$5427.81. When we did see the brief Council press release we assumed it did not apply to our property as we have never paid it in the past and we do not benefit from any of the Water and Sewer functions.

2000 properties are identified in the Gosford LGA in Table 2 of the Proposed Charges and from discussions with other farmers, they had no idea this charge was proposed by Council. They are alarmed at the proposal and on top of Council rates it would have a unreasonable impact on the farming ratepayers.

Council also stated under Community engagement “Customers said prices should be consistent across the Central Coast LGA. Reliability of the services and value for money is also important to customers.”

This statement is contrary to the proposed charges for Stormwater Drainage for non-residential properties. The proposal is not for consistent prices across the Central Coast and certainly there is no value for money as we do not benefit from the water services like water or sewerage!

As an example of how, even to this day 3 days before the original closing date for IPART submissions, Central Coast Council are misleading the residents they have issued a press release with no mention of the specific charges which are going to be incurred by properties west of the M1 and they continue to claim:

*“We recently held information sessions specifically for residents and businesses west of the M1 in the former Wyong local government area and Council encourages these community members to provide feedback on the proposed changes directly to IPART.*

*Council’s proposal to apply a consistent approach to the stormwater drainage charges reflects the regional benefit”*

In fact there was one (1) information session on the Saturday of the long weekend and no information made available to the individual properties which are going to incur the very inconsistent charge for properties Council has identified as non-residential large and very large.

Thank you to IPART for extending the submission date by a week and we will attempt to talk to other ratepayers and groups like the NSW Farming Association about these charges. However, this should have been done by the Council direct, not coming as a shock only 3 days before submissions were closing.

### **The Council’s expenditure**

Has the Council’s expenditure over the current determination period delivered appropriate levels of service?

In my opinion, the answer is NO. They have not fixed Mangrove Creek Dam as it requires a major upgrade to meet safety standards and be fill to capacity. As we head into another summer with drought conditions the dam level is falling but if it had been able to be filled to capacity the Central Coast would be in a much better position. Water is precious and yet for many years the Central Coast Water Authority has neglected the major water storage facility.

Yours sincerely

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