

27 August 2018

Review of the Sydney Water Operating Licence
Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
NSW 1240

Our Ref: 2018/530356

Dear Sir/Madam

Re: End of Term Review of Sydney Water's Operating Licence 2015-2020

Northern Beaches Council welcomes the opportunity to provide comment to the Independent Pricing and Regulatory Tribunal of NSW (IPART) review of Sydney Water's Operating Licence 2015 – 2020.

The 2015-2020 Operating Licence notes Sydney Water's obligations to:

- Co-operate with, and participate in, any Government review of the Priority Sewerage Program
- If required by the Minister, implement and comply with any outcomes (including timeframes) of a Government review of the Priority Sewerage Program.

IPART is seeking comment on the following:

What are your views on maintaining or removing the existing obligations on Sydney Water regarding the Priority Sewerage Program?

Northern Beaches Council believes the State Government should carry out a review of the Priority Sewerage Program prior to any decision being made about retaining or removing obligations regarding the Program from Sydney Water's Operating Licence. Sydney Water has stated in their submission that they are happy to participate in such a review (*Response to Issues Paper* Section 8.2).

The Operating Licence is used as the regulatory mechanism to deliver the Priority Sewerage Program, as this then requires Sydney Water's wastewater customers to contribute to the cost of sewerage for the villages under the Program. Without this mechanism, there is no commitment from the Government to consider wastewater services for unsewered areas listed under the Program, including Scotland Island.

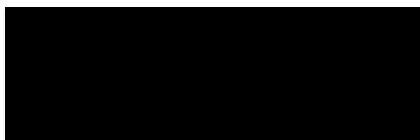
The review would inform any changed position regarding priorities. Sydney Water must be required to demonstrate that the lack of these services is having no detrimental health, water quality and environmental impacts on the communities and receiving waters of the remaining PSP areas.

Northern Beaches Council is currently carrying out a commercial feasibility study for the provision of water and wastewater services to Scotland Island, funded by the State Government and expected to conclude in late 2019. It would be premature to remove any commitments to the Priority Sewerage Program prior to the results of this study being available.


Additionally, Northern Beaches Council encourages consideration of a number of other unsewered urban areas in the Northern Beaches for provision of wastewater services including; parts of Bayview/Church Point, Wirreanda Valley in Ingleside, and the Western Foreshores of Pittwater. These are all areas impacting the quality of surface water entering the Pittwater Estuary, and the absence of appropriate sewerage systems is a source of ongoing community concern.

Council appreciates your consideration of this important environmental and public health matter. Should you require further information in regard to matters raised in this or Council's previous submission, please do not hesitate to contact the Council Officer listed below.

Yours faithfully,



Todd Dickinson
Acting General Manager, Environment and Infrastructure

Enquiries: Ruby Ardren, Project Leader – Water Management, .