

August 16, 2018



Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
NSW 1240

Dear Sir/Madam,

Re: Sydney Water Operating Licence, the Priority Sewerage Program (PSP) and Scotland Island

We wish to respond to the request for comment in the 2019 IPART review of the **Sydney Water Operating Licence** in relation to: *What are your views on maintaining or removing the existing obligations on Sydney Water regarding the Priority Sewerage Program?*

The view of Scotland Island residents is that until the State government identifies an alternative delivery channel and funding source, Scotland Island should remain on the Sydney Water Priority Sewerage Program. Not only should the existing obligations be maintained, but also a time frame should be adopted for project implementation, following the completion of the feasibility study (described below), into the supply of water and wastewater services to Scotland Island that will shortly be undertaken.

Previous Commitments and Promises: This issue has a long history with the local community being led to believe over many years that the installation of a sewerage system was promised and imminent. For example in January 2011, just prior to becoming the Premier of NSW [Barry O'Farrell wrote \(link\)](#): *"The NSW Liberals and Nationals will fast-track the connection of sewerage ... clearing most of the Keneally Labor Government's Priority Sewerage Program backlog,... We will also ensure remaining areas such as Austral, West Hoxton, Menangle, Menangle Park, Nattai and **Scotland Island** are connected to the sewer as a matter of priority..."*

In December 2012, the NSW Government's [Northern Beaches Regional Action Plan \(link\)](#) made a clear commitment to *"Better manage waste water and improve ocean water quality including upgrades to waste water and sewerage treatment facilities for **Scotland Island**", (page 13). And also "The provision of wastewater services to **Scotland Island** is a matter of priority ..."* (page 14).

Feasibility Study: Consistent with the above commitments, Northern Beaches Council has recently received State Government funding through the Stronger Communities Fund to conduct an independent investigation into the commercial feasibility of water and wastewater services to Scotland Island.

As part of the project options for servicing the Island will be investigated. This will address the type of system (e.g. gravity or pressure sewer) and who operates the system. Two servicing options will be selected to take forward to the commercial feasibility study. The commercial feasibility study will consider whether the proposed options are likely to be commercially viable in the long term and may propose suitable operating models for the system.

This study will inform decisions to be made on the provision of reticulated water and wastewater services on Scotland Island, which is ultimately a matter for the appropriate service providers.

See here for more details: <https://yoursay.northernbeaches.nsw.gov.au/scotlandislandwater>

Urban Situation: Over the past 30 years Scotland Island has transformed into a fully populated, albeit highly vegetated, suburb of Sydney. As with any suburb of Sydney it now requires the infrastructure that is standard to most Sydney suburbs.

Scotland Island Residents' Association Incorporated
P O Box 70, Church Point 2105 ABN 19 163 341 913
president@sira.org.au

The Island's differentiating factor is the low number of vehicles and the width and condition of most of its roads. But in all other respects it has the same infrastructure requirements.

As with most parts of Sydney the trend to towards a greater and more compact population will continue going forward and the infrastructure requirements will continue to increase.

Environmental Effects: Scotland Island is an area that has highly valued spotted gums which are negatively impacted by the nutrient rich ground water containing effluent flowing from the many onsite septic and aerobic systems. Particularly during rainstorms, this nutrient rich effluent flows into the surrounding Pittwater and continues to significantly contribute to invasions of *Caulerpa Taxifolia* (a non-native sea grass) destroying fish habitat because of its production of toxic substances.

Health Effects: The Martens and Associates study, [*Australian On-site Waste Water Strategies: A case study of Scotland Island*](#) conducted in 1996-97, reported that storm water run-off on the Island is contaminated with both nutrients and bacteria, indicating severe sewage run-off pollution. Bacterial levels are extremely high, significantly exceeding ANZECC guidelines for surface water and in the salt water estuaries:

- **Faecal Coliform levels** were measured at levels between 96,850 to 58,475 ColonyForming Units per 100 mL. The recommended ANZECC safety level being a maximum of 150 Units per 100 mL. That is **up to 645 times above the recommended safety level.**
- Even more concerning was that **Enterococci levels** (that can lead to urinary tract infections, bacteraemia, endocarditis, diverticulitis, and meningitis) were measured at levels between 91,207 to 51,869 organisms per 100 mL. The recommended safe level being a maximum of 35 Organisms per 100 mL. That is, up to **2,600 times above the ANZECC safety level.**

Cost: We await the results of the Feasibility Study before we comment further.

Who Pays: The Scotland Island Community is prepared to contribute to this project to the same extent as all other previous recipients of the Priority Sewerage Program. Specifically, to the cost of any necessary upgrade to domestic plumbing systems, the connection from the house to the mains system and the removal of redundant domestic septic systems. The community is neither prepared nor able to contribute to the capital cost of this project. We have no view as to whether this project should be funded directly by Sydney Water or by the NSW Government.

Timing: Once results of the Feasibility Study are complete, a timeline for this project must be finalised and the project must be undertaken and completed within the period of the current (?) operating licence.

Our **strong view** is that until the State government identifies an alternative delivery model and funding source, Scotland Island should remain on the Priority Sewerage Program.

We again thank IPART for an opportunity to provide our submission and we hope that the outcome will be a positive step in the resolution of this long-standing issue.

Yours truly,

Neelica Raffel
President, SIRA

cc: Rob Stokes, MP