

# Review of Sydney Water Operating Licence



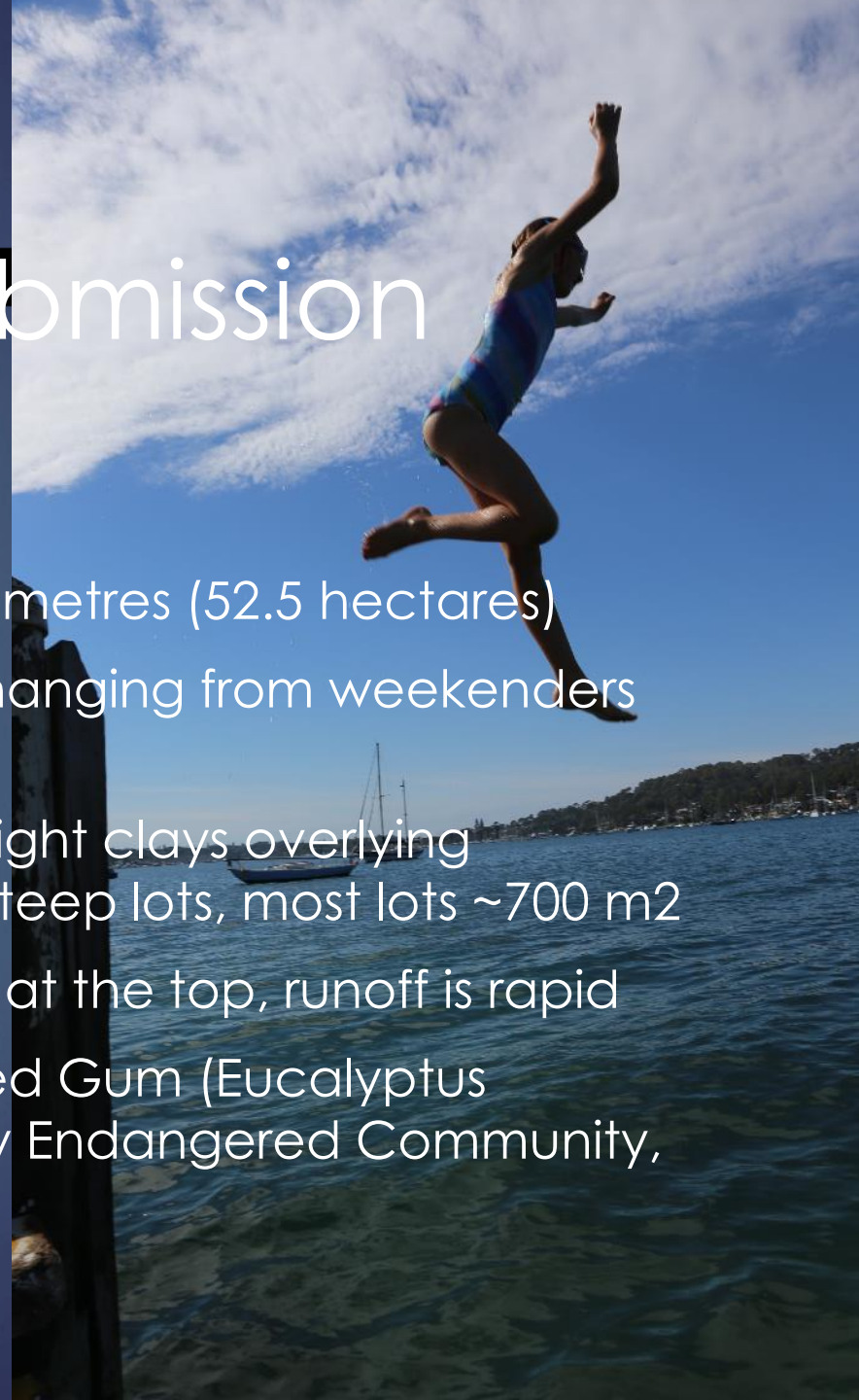
SCOTLAND ISLAND RESIDENTS' ASSOCIATION  
SUBMISSION TO IPART. FEBRUARY 2019

# Scotland Island



# Scotland Island, context of our submission

- ▶ 1 km diameter island in Pittwater
- ▶ Covers an area of 0.5 square kilometres (52.5 hectares)
- ▶ About 362 houses, population changing from weekenders to permanent. A lot of families.
- ▶ Soils are generally very shallow, tight clays overlying sandstone formation, outcrops, steep lots, most lots ~700 m<sup>2</sup>
- ▶ Topography is steep, 120 m AHD at the top, runoff is rapid
- ▶ Very vegetated suburb. A Spotted Gum (*Eucalyptus maculata*) forest, an Ecologically Endangered Community, covers most of the island





# Impacts of absence of sewerage on the environment

- ▶ Soils fully saturated with nutrients already in 1997 (Martens, 1997)
- ▶ Poor health of endemic spotted blue gum in areas with many onsite sewage system release, nutrient rich soils.
- ▶ Septic systems and biosystems disposal not suited to very low permeability soils: permanent wet patches, mosquito breeding and weeds.
- ▶ Nutrients rich runoff contributes to the proliferation of *Caulerpa Taxifolia* (non-native sea-grass) which destroys fish habitat through release of toxins.
- ▶ Sewerage release above impermeable clay beds finds its way into the waterway
- ▶ Sickneses (contamination through swimming). Faecal coliforms and enterococci
- ▶ Situation not in line with the objectives of the Pittwater Waterways Strategy



# Scotland Island and Sydney Water


- ▶ Scotland Island has been on the Priority Sewerage Program for over 20 years
- ▶ Sydney Water had committed to installing sewerage on Scotland Island
- ▶ All of Pittwater's main land peninsula is connected even through the most difficult landscape of the Peninsula
- ▶ Scotland Island is one of the last un-sewered areas on the Northern Beaches
- ▶ Discussions for a Scotland Island connection date back prior to 2000, this is a long time for nothing to happen!



***In the meanwhile one of world best waterway becomes contaminated***

# SIRA's Position

Nothing has happened, the rest of Sydney was being connected and/or developed.

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- ▶ 1996-1997: Martens & Associates study. Soils and waste water strategies study specific to Scotland Island. Outcomes identified unsuited and fully saturated soils, high contamination of waterway.
  - ▶ 1997: Start of the Priority Sewerage Program. Requirement as a licence condition, Sydney Water to install sewerage system on Scotland Island.
  - ▶ January 2011, just before becoming the NSW Premier, Barry O'Farrell wrote *"We will also ensure remaining areas such as Austral, West Hoston, Menangle, Menangle Park, Nattai and Scotland Island are connected as a matter of priority"*.
  - ▶ December 2012, the NSW government makes a commitment to *"better manage waste water and sewerage treatment facilities for Scotland Island"* and identifies provision of wastewater service on the island as a priority (Northern Beaches Regional Action Plan).
  - ▶ 2019 Commercial feasibility study for the provision of water and waste water to Scotland Island, facilitated by Council, with funds from the NSW Government.



# SIRA's Position

- ▶ Sydney Water is required in its operating licence to:

- ▶ *Co-operate with, 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.*

- ▶ **SIRA supports iPart's recommendation that Scotland Island remains on the Priority Sewerage Program.**
- ▶ **SIRA requests that conditions include a timeline.**
- ▶ **SIRA requests NSW Government identifies funding.**
- ▶ **Licencing and implementation are a matter for the NSW government.**





# SIRA's Position – Funding

- ▶ Sydney Water accepted the licence conditions of the Priority Sewerage Program many years ago, yet refuses to deliver it.
- ▶ The argument has been made (by others) that current Sydney Water customers should not pay for a capital project for non-current customers. SIRA points out that tax payers' money currently contributes to the benefit of Sydney Water shareholders. Sydney Water had an annual profit of \$546 millions after tax in 2017-2018. Should shareholders be prioritised against the urgent needs of a community and against licence compliance?
- ▶ The current model of funding sewerage for developing suburbs is not applicable and the NSW government should revert to models for funding available 20+ years ago for established suburbs.
- ▶ **SIRA requires the NSW government to identify a funding source. Residents do not agree, nor are they able, to contribute to the capital costs.**





# SIRA's Position – Timing

- ▶ On-site sewerage systems are not suitable to the natural features of Scotland Island, as the soils are fully saturated with nutrients and are mostly impermeable resulting in direct run-off to the bay.
- ▶ Commitments have been made for over 20 years, yet nothing has been done.
- ▶ The population of Scotland Island is growing, compounding the impacts.
- ▶ The current situation conflicts with the *Pittwater Waterway Strategy* (currently in draft).
- ▶ Northern Beaches Council has recently reverted to applying the *Australian Standard for On-site domestic wastewater management (AS/NZS 1547:2012)* without considering whether or not irrigation areas and trench requirements can be practically achieved and the suitability of the soil. A significant proportion of properties will be unable to meet the standards due to the natural settings. Conflicts are inevitable.





# Thank you.

Contact: [REDACTED]

