

Attachment 1 to Item 106

Council Report Item 230 Domestic Sullage (23 November 2021)

Date of meeting: 14 June 2022 Location: Council Chambers Time: 6:30 p.m.

Meeting Date: 23 November 2021

INFRASTRUCTURE SERVICES

Item: 230	IS - Domestic Sullage - (95498, 112179)
Previous Item:	119, Ordinary (29 June 2021)
Directorate:	Infrastructure Services

PURPOSE OF THE REPORT:

The purpose of this report is to provide the information requested in regard to domestic sullage in accordance with Council resolution dated 29 June 2021.

EXECUTIVE SUMMARY:

Council at its meeting on 29 June 2021 considered a report regarding Domestic Sullage and resolved, in part, to receive a report providing information regarding:

"That:

- 5. A further report be provided to Council that covers:
 - Alternative pricing structures including user pay
 - The feasibility and economic potential of split systems (i.e. grey water treatment and brown water treatment) and how this might reduce costs
 - A draft survey of pump-out households
 - How the revised Development Control Plan will provide more flexibility to the owners of the new dwellings who would like to explore alternatives to pump-out
 - The information that Council provides to homeowners concerning inspections."

As background information to this report, the report considered by Council at its meeting on 29 June 2021 is attached as Attachment 1 to this report.

RECOMMENDATION:

That Council:

- 1. Enter into discussions with Sydney Water regarding their strategic plans for the North West area.
- 2. Review the Sullage service prior to the expiration of the current contract in May 2023 and report back to Council service and contract options, and the associated financial, environmental and regulatory considerations.
- 3. An update on the outcomes of Parts 1 and 2 to be reported to Council no later than June 2022.
- 4. Engage a consultant to develop education material regarding various technologies available in regard to split systems, including the criteria applicable for each system.
- 5. Receive and note the results of the survey of pump-out households.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

- 6. Receive and note the comment included in the revised Development Control Plan in regard to effluent disposal.
- 7. Receive and note the information that Council provides to homeowners concerning inspections.

BACKGROUND

At its Meeting on 29 June 2021, Council considered a report regarding Domestic Sullage and resolved, in part, as follows:

"That:

- 5. A further report be provided to Council that covers:
 - Alternative pricing structures including user pay
 - The feasibility and economic potential of split systems (i.e. grey water treatment and brown water treatment) and how this might reduce costs
 - A draft survey of pump-out households
 - How the revised Development Control Plan will provide more flexibility to the owners of the new dwellings who would like to explore alternatives to pump-out
 - The information that Council provides to homeowners concerning inspections."

Relevant Legislation

- Water Industry Competition Act (WICA)
- Part 3, Division 2 (Sections 56-66) of the Local Government Act 1993
- Local Government (General) Regulation 2005
- Protection of the Environment Operations Act 1997 and Regulations
- Onsite Domestic Waste Water Management AS 1547/2012 (Standard)
- The Hawkesbury Development Control Plan. Section 1.18 of the Hawkesbury Development Control Plan states, in relation to effluent disposal: 1.18 EFFLUENT DISPOSAL Aim (b) To ensure that there is adequate land for onsite effluent where land is not serviced by reticulated sewer. Objectives – Connection to reticulated sewerage is required for all forms of residential development, apart from single dwellings and rural dual occupancies.

DISCUSSION

The information requested in the Resolution is provided below:

1. Alternative pricing structures including user pay

The sullage service is self-funded through an internally restricted reserve, with all revenue from the charges being restricted for expenditure on the program. The annual sullage charge for residential and commercial properties is determined based on maintaining the desired level of funds in the reserve to fund on-going expenditure, and is based on full cost recovery. Council does not generate any profit from this service.

Council provides the sullage collection service through an external contractor. The current contract, due to expire in 2023 is based on a minimum fortnightly pumpout frequency. Under the current contract, Council pays the contractor an agreed charge per domestic service which equates to a total sum payable per annum based on the number of properties being serviced on a weekly or fortnightly basis, in addition to commercial, extra, and emergency services.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

Pricing Structures

Currently domestic services are charged a flat annual charge whilst commercial customers are charged on volume pumped out with a minimum charge applicable. Extra and emergency sullage pumpout services are also available to customers on request. These services are charged at a flat rate per service.

In regard to domestic sullage service, there are currently:

789 properties on a fortnightly service, 2021/2022 annual charge \$2,605.36 10 properties on a weekly service, 2021/2022 annual charge \$5,210.72

By comparison, the annual sewer charge is \$931.02.

Alternative pricing structures include:

- Volume based Charge
- Annual charge based on weekly, fortnightly or monthly based on estimated volume
- Minimum charge plus volume based charge.

Any change in pricing structure during the term of the existing contract is challenging due to existing contractual obligations and the "guaranteed" income forming the basis of the contract. Any change would result either in a cross subsidisation within the customer base, or a subsidisation by Council.

Whist changing the frequency of collection during the term of the current contract is challenging, Council could look at a different contract structure when entering into a new contract after the expiry of the current contract in 2023.

The pricing structure options explored below are based on the assumption that they are implemented within the context of a new contract.

Volume based charge

A volume based charge, or user pay pricing structure, means that homeowners pay for the actual volumes of sullage pumped out from the septic tank. The volumes pumped out are already being measured through flow meters installed in the contractor's trucks.

This pricing structure, whilst it may be perceived to be the fairest for homeowners, has a number of risks and challenges.

The potential financial and environmental impacts are as follows:

- From a contract perspective, it would be challenging to establish a "guaranteed" base income. This is likely to result in a high per Ltr charge being applied by the contractor.
- As volumes would fluctuate, it would be challenging logistically for the contractor to organise
 its truck runs. The service required would be on demand and would rely on the homeowner to
 request the service in a timely manner. This "reactive" type service is also likely to result in a
 high per Ltr charge being applied by the contractor.
- Increased potential for environmental and public health risks due to system failures where pump-out services are not organised before the system reaches capacity.
- Additional resources required to monitor and regulate the operations of the septic tanks due to the higher risk of system failure.
- Significant administrative burden and cost as each property would need to be invoiced monthly for actual volumes pumped out, rather than the current annual charge being included

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

as part of the Rates Notice. Monthly invoicing would require additional resources, with this cost being passed on to the homeowner.

Positive outcomes include:

- Incentive to implement water conservation / reduced discharge (although most households have already introduced these measures).
- More equitable charges based on user pay principles.

It is further noted that in areas where sewer services are provided, charges are made on a flat fee/charge and do not reflect volumes discharged. This principal is applied to ensure the best outcome for public health and environmental management. Whilst it is recognised that sullage charges are significantly higher, these same principles are still valid.

The challenges and risks associated with a volume based charge outweigh any potential benefits and ultimately are not likely to result in a significant reduction in cost for the homeowner.

Annual charge based on weekly, fortnightly or monthly based on estimated volume

Alternative options and arrangements for the frequency of collection were investigated in 2014, with a view to assessing the feasibility of reduced frequency collection for households generating lower sullage volumes. Eligibility for a reduced frequency collection was determined on the basis of volume of effluent generation or tank/storage capacity in order to ensure no overflows would be likely to occur. The reduction in service frequency that was considered most feasible was from fortnightly to monthly. At that time, based on a history of sullage pumpouts of less than 1,800 litres per pumpout service per property on a fortnightly basis and the sullage storage tank not being less than 4,000 litres in capacity, approximately 205 out of the total services could potentially be permitted to move to a monthly sullage pumpout service.

Should this option be further explored prior to the expiration of the current contract, a more up to date analysis of volumes being pumped out from each property would need to be undertaken, utilising volume data collected through the use of flow meters.

The potential financial and environmental impacts are as follows:

- The addition of a monthly service option could result in an increase in charges applicable to fortnightly and weekly sullage services, for the contractor to maintain the desired level of income to cover fixed and variable cost and an adequate profit.
- Should additional pumpouts be required, the cost of the additional service would negate the benefits to the resident.
- Increased potential for system failure leading to discharge of sullage into the environment to achieve the volume threshold required to move to a monthly service. A reduced collection frequency to reflect low volume generation would require strict controls on initial and ongoing eligibility (conformance, volume, environmental issues).
- Requirement to increase the frequency of inspections, leading to additional resources to monitor and regulate the option of an additional monthly service.

Positive outcomes include:

- Incentive to implement water conservation / reduced discharge (although most households have already introduced these measures).
- More equitable charges, as the option of a reduced frequency collection would provide the opportunity to better align cost with volumes pumped out

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

A reduced frequency of pump out for some customers would not result in significant operational efficiencies, and therefore charges to homeowners may not be reduced. Pump out times would not change significantly with any time savings in pump out connection balanced by more frequent transport time to the Sewer Treatment Plant. Council would potentially also incur higher treatment costs at its treatment plant due to higher ammonia levels arising from longer tank resident times. These costs would be passed on through charges to homeowners.

Minimum charge plus volume based charge

When reviewing the basis of a new contract the option of a minimum charge plus volume based charge could be explored. This type of price structure may address some of the challenges associated with a pricing structure solely based on volume and partially address the issue of alignment of volumes and charge. The volume based element of this pricing structure, would, however still result in most challenges and risks associated with a volume based charge.

Other Options

Council ceasing being a Service Provider

Homeowners can obtain an independent sullage pump out service, by a contractor of their choice. It is not mandatory to use Council and pay the applicable annual charge. Council does not have a legislative requirement to provide the sullage service. History does show, however that homeowners that had chosen to use a contractor other than Council's service, have returned to using the Council sullage collection service due to cost.

Council has historically provided this service with a view it can use its purchasing power to attract a contract that minimises the cost to homeowners due to economies of scale. Whilst this approach may have achieved this objective, it has also created a monopoly making it cost prohibitive for new entrants or other players in the market to provide a cost effective service. If Council was to cease being a provider of sullage collection services, the supplier market may become more competitive and consequently charges to homeowners by suppliers of the service may be reduced.

If Council was to cease to provide the service, increased education and regulatory activities would need to be implemented. The cost of these activities could be recouped through higher Septic Tank Inspection fees.

It is further to be noted that it would not be cost effective for Council to remain a player in the market. A reduced market would result in even higher contractor charges being payable by Council and consequently higher charges.

Subsidisation of cost by Council

Council could consider subsidising the cost of sullage collection to homeowners. The funds to provide this subsidy would need to come from general funds available for other services to the community overall, including those residents paying a sewerage annual charge. Subsidising the cost of infrastructure for a select section of the community only may not be equitable.

Table 1 shows the value of a subsidy to the homeowner on a fortnightly service (789 properties) and the associated cost to Council for a 50%, 25% and a 10% subsidy.

Meeting Date: 23 November 2021

Table 1 – Fortnightly Service

	50%	25%	10%
Saving per year per property	\$1,302.68	\$651.34	\$260.54
Cost to Council	\$1,027,815	\$513,907	\$205,563

Table 2 shows the value of a subsidy to the homeowner on a weekly service (10 properties) and the associated cost to Council for a 50%, 25% and a 10% subsidy.

Table 2 – Weekly Service

	50%	25%	10%
Saving per year per property	\$2,605.36	\$1,302.68	\$521.07
Cost to Council	\$26,054	\$13,027	\$5,210

The total cost to Council is \$1,053,868 for a 50% subsidy, \$526,934 for a 25% subsidy and \$210,774 for a 10% subsidy. The applicable cost would be budgeted as an expense, thereby reducing funds available for other Council programs and projects. The cost would apply annually, and will progressively increase over time in line with increases in the charges.

Council providing the service itself

The option of Council providing the sullage service utilising its own staff and plant, rather than through an external contract can be explored. The necessary set up capital costs and ongoing operational costs including staff costs, plant running costs, disposal costs and overhead costs can be estimated based on the number of properties serviced and frequency of collection.

Connection to Sewer

As detailed above the cost of sullage to homeowners is dictated by the cost incurred by Council to provide the service. It is likely that even with a different pricing structure than the current structure the cost associated with pump-out infrastructure will remain higher than costs associated with sewer infrastructure.

Connection of properties to Council's sewer network is currently not feasible. The unsewered areas are outside Council's area of operation. The initial capital cost is currently not planned for, and would therefore require higher annual sewer charges to be applied to those areas being connected to recoup the costs. On an ongoing basis, there is currently no business case to expand the sewer network.

Connection to Sydney Water sewer could be explored through engagement with Sydney Water regarding their strategic plans in this regard.

There is also the option for areas currently not connected to a sewer system to have stand-alone sewer systems. Similar arrangements are in place at Pitt Town and Nepean Park. Operators of existing or proposed standalone systems in the area could be contacted regard to the commercial viability of expanding these systems.

Standalone systems are generally established as part of a development, and are privately owned. Whilst a possibility, it may be challenging to attract this type of investment, noting that it is likely there would be a requirement for residents in those areas to contribute to the capital cost of the infrastructure, and initial connection costs. There is also no guarantee that these types of systems would result in a lower ongoing servicing costs than the current sullage pump out charges.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

2. The feasibility and economic potential of split systems (i.e. grey water treatment and brown water treatment) and how this might reduce costs.

Council uses the Onsite Domestic Waste Water Management AS 1547/2012 Standard to determine the type of on-site sewage management facility that is most appropriate for each property. There is a potential for more in-depth analysis of each property which would be obtained through a private wastewater study undertaken by the homeowner. The results of the wastewater study on any given property may still lead to a determination that a pump-out system is still the only appropriate system. However, there is a possibility that for some properties alternatives would be found, an option of which could potentially be a split-system. If an alternative was found, the cost of the system will be dictated by the type of system recommended, and some systems may result in lower running costs systems

Other types of on-site sewage management facilities (not effluent pump-out) do not incur the ongoing cost of paying for a pump-out service, as their wastewater is treated by their system in various ways dependent on their system type.

Properties that have these types of onsite sewage management facilities, these properties also comply with the Onsite Domestic Waste Water Management AS 1547/2012 standard and relevant legislation. Though some properties currently utilising an effluent pump-out system would also fall into these categories, the costs to convert/decommission their pump-out system and set up an alternative system are generally viewed as prohibitive.

Further, many of these types of systems (in particular, composting units, reed beds, sand filter mounds and worm farms require a high level of dedication and effort on the part of the property owner to maintain in working and compliant order. Even with a high level of dedication, user-error can result in system failure which can then lead to extensive contamination of land application areas. These types of systems can also have a negative effect on property resale value, as it can limit the number of potential buyers.

A desktop review (online) found price ranges for system types as below:

- Effluent pump-outs (conventional gravity system or pressure sewerage system)
 - Approximately \$2,000 \$3,000 plus installation, excavation and material costs plus annual fee of \$2,026.16 for the pump-out service through Council.
- Septic tanks with adsorption trenches or evapotranspiration beds;
 - Approximately \$4,000 \$6,000 plus trenching at approx. \$100 per meter, plus installation, excavation and material costs plus ongoing costs.
- Aerated wastewater treatment systems,
 - Approximately \$7,000 \$14,000 plus installation, excavation and material costs plus ongoing costs.
- Irrigation systems
 - A wide approximate range from \$200 \$8,000 dependent on multiple factors including ground/soil type, land size plus ongoing costs.
- Composting units, reed beds, sand filters and mounds
 - A wide approximate range from \$200 \$30,000 plus ongoing costs.
- Worm farm systems
 - \$13,000 \$25,000 Treated water has to be disposed of via sub-soil an application which has to be done more than 300mm underground. These systems are also highly susceptible to failure for a range of reasons including but not limited to temperature change, chemical sensitivity, and flooding.
- Dry composting systems also exist, with high costs that are very dependent on property type and are unpopular due to the level of direct maintenance by the property owner, odour and flies.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

Further, if a resident has an effluent pump-out system installed on their property and wished to change to one of the abovementioned systems, there would also be a cost to empty and decommission their existing system.

If a property has an existing system that fails or the owner fails to service their system regularly (must show proof), Council can and does force owners to convert their systems to a pump-out service. This is a rare occurrence, but is in the best interest of environmental and public health.

There are examples around Australia of property owners attempting, and in some circumstances being successful in going "off grid". An example of this is the famous Michael Mobbs 'green house' in Chippendale (City of Sydney Local Government Area). Michael Mobbs utilised many green ideas to completely take his home off the grid and manage it in a sustainable way. In terms of his waste water, Michael treats this water utilising a unique and purpose-built aerated wastewater treatment system, which also treats the water with other filtration methods including sand and UV lights. NSW Health would determine this system as a 'unique' system and has allowed it to be used for water re-use for washing clothes and flushing toilets for the purpose of research. The reused water may be safe for healthy people to be around; however those with compromised immune systems could potentially face severe health risks with a system like this.

The ability to implement any of the above systems on a property is dependent on the property meeting certain criteria. Accordingly, homeowners need to assess the viability of any potential system in lieu of a pump out system, based on the specific characteristics of their property.

To assist homeowners with these processes it is recommended that Council engage a consultant to prepare education material regarding various technologies available in regard to split systems, including the criteria applicable for each system. The material will be made publically available free of charge to provide basic information as a starting point for homeowners that would like to explore alternative systems.

3. Survey of pump-out households

A survey in regard to Domestic Sullage was undertaken. The survey was emailed to 258 residents who have a pump-out service and who Council has email contact for. The number of residents surveyed represents a statistically valid sample.

The survey was open from Tuesday, 28 September to Friday, 15 October 2021 (just over two and a half weeks). 119 or 46% of homeowners surveyed responses to the survey were received.

The following information was provided with the link to the survey:

- The vast majority of properties in the Hawkesbury that have an on-site pump-out system is because there are no other alternatives. The type of on-site sewage management facility a property can have will be dependent on a variety of factors including, but not limited to characteristics such as lot size, soil type, property slope gradient and proximity to waterways
- In some situations, lot owners also have the ability to select their preferred type of on-site sewage management facility, given they remain compliant with legislation and standards. Though many properties can utilise alternative on-site sewage management facilities, many residents opt for a sewage pump-out service because alternatives require a higher degree of maintenance and/or pose a higher risk of failure and non-compliance.
- Alternatives to pump-out systems include but are not limited to: Irrigation systems, Septic tanks with adsorption trenches or evapotranspiration beds, aerated wastewater treatment systems, composting units, reed beds, sand filters and mounds, worm farm systems and dry composting systems
- While an ideal situation would be to have all properties connected to a sewer system, in areas where there is scattered population, lower population densities, environmental constraints (significant incline / distance to current infrastructure), the significant financial costs of installing sewer infrastructure and elevated ongoing costs makes this option prohibitive for many parts of the Hawkesbury.

The questions, summary and thematic analysis of the survey results is shown in Tables 3 and 4.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

Table 3 Survey Questions and summary of the Results

	Question	Results (Total responses 119)
1.	Have you investigated alternate systems to pump out? (Examples include Septic tanks with adsorption trenches or evapotranspiration beds, aerated wastewater treatment systems, Irrigation systems, composting units, reed beds, sand filters and mounds, worm farms and dry composting systems).	Approx. 50% of respondents have investigated alternatives and 50% have not investigated alternatives.
2.	Are you interested in finding out more about alternate systems to pump out?.	107 of the respondents are interested in learning more about alternatives.
3.	Are you willing to obtain a wastewater study to demonstrate if there is an appropriate alternative to a pump out system for your property? (Estimated cost for this would be \$1,000 - \$1,500).	Only 39 respondents were willing to obtain a wastewater study at their cost.
4.	If there was an alternate system to the pump out that suited your situation and budget, would you change?.	110 respondents would change their system if an alternate was available.
5.	How much effort are you willing to put in to managing your sullage?.	Respondents ranked the options for effort in managing sullage as follows: Changing cleaning products, thinking about what you flush, not washing all in one day, spending one hour per month, just push a button and forget.
6.	Would you like to be able to use treated water in your garden or flush your toilet?.	109 respondents would like to use treated water in the garden to flush the toilet.
7.	If there was a Government program to assist you to buy an alternate system with cheaper running costs (in the long run) but potential initial outlay, would you be interested in participating?.	110 respondents would be interested in participating in a government assisted program whereby they initially paid for a better system which would eventually be cheaper ongoing.
8.	If you have any issues with the current pump out service, what are they? (choose as many responses as you wish).	110 respondents cited cost as the #1 issue they have with the pump out service, followed by odour, frequency, volume constraints, and environmental impacts and 'other' which was mostly regarding truck size and safety issues on the road.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

	Question	Results (Total responses 119)
9.	Did you know that you have a choice of which supplier you get to collect your sullage?.	110 respondents did not know they have a choice of pump-out supplier.
10.	If you did know that you have a choice of which supplier you get to collect your sullage, have you investigated other services?.	Nine respondents said they did investigate other services.

Table 4 Thematic analysis of Open ended Questions

Key theme	Comments	Response
Cost	 Many respondents feel the cost for pump-out is too high Many respondents also cited the cost for singles/couples being too high given pump out volume is less Cost an unfair burden, 'if council says we have no alternative, we shouldn't have to pay'. 	The sullage service is self-funded through an internally restricted reserve, with all revenue from the charges being restricted for expenditure on the program. The annual sullage charge for residential and commercial properties is determined based on maintaining the desired level of funds in the reserve to fund on-going expenditure, and is based on full cost recovery. Council does not generate any profit from this service. Pricing structures supporting a better alignment between charges and volumes pumped out from a property can be explored when forming a new contract. Homeowners do have an option not to use Council and get their own contractor.
Pump out service	 Pump-out trucks cause a traffic hazard as they block roads while doing the pump out Respondents also note that these trucks are damaging the local roads No regular timetable for pump out Significant odour during pump-out. 	Contract conditions require the contractor to undertake risk assessments and apply appropriate traffic control standards. The contractors trucks are users of public roads, same as all other trucks and vehicles. There is a regular timetable for pump outs. The odour is an inevitable part of the pump-out process.
Sewer	 Many respondents just want to get connected to the mains sewer and would like to see Council install or advocate for it. 	 As detailed in this report: It is not feasible for Council to extend its sewer network.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

		 Decentralised stand-alone systems could be constructed and operated by appropriately licensed operators, but significant initial costs are likely to apply with no guarantee of cheaper ongoing servicing costs. Discussions can be undertaken with Sydney Water regarding their plans for expansion of their sewer network.
Wastewater Study	 Of the respondents who were willing to pay for a wastewater study, many stated they were happy to pay for it only if there was a guarantee that there would be an alternative to pump out. Respondents cited that they would like a wastewater study but do not feel they should have to pay for it. 	• Council uses the Onsite Domestic Waste Water Management AS 1547/2012 Standard to determine the type of on-site sewage management facility that is most appropriate for each property. There is a potential for more in-depth analysis of each property which would be obtained through a private wastewater study undertaken by the homeowner. The results of the wastewater study on any given property may still lead to a determination that a pump-out system is still the only appropriate system. However, there is a possibility that for some properties alternatives would be found, an option of which could potentially be a split-system. If an alternative was found, the cost of the system will be dictated by the type of system recommended, and some systems may result in lower running costs systems.
		• The ability to implement any of the above systems on a property is dependent on the property meeting certain criteria. Accordingly, homeowners need to assess the viability of any potential system in lieu of a pump out system, based on the specific characteristics of their property.
		• To assist homeowners with these processes it is recommended that Council engage a consultant to prepare education material regarding various technologies available in regard to split systems, including the criteria applicable for each system. The material will be made publically available free of charge to provide basic information as a starting point

Meeting Date: 23 November 2021

		for homeowners that would like to explore alternative systems.
Education	 Many respondents cited that their neighbours have alternatives to pump-out even though they are forced to have pump-out. Some also sight they believe neighbour's systems are not being kept up. Interested in learning about possible alternatives, interested in learning about how to use treated water, understand restrictions but not happy about it. "My neighbour has a different system on a smaller block", "my neighbour has a system they don't upkeep", historic approvals vs new approvals being different". Many respondents said that had they known their property was not connected to sewer before purchasing, they would not have bought their property. 	 Some properties have different systems to pump-out which were approved before regulations and standards were changed. It has been Council's policy not to force these property owners to change to a pump-out system unless their current system fails (e.g. causes/poses an environmental/public health risk). One-on-one education programs are held with property owners and members of Council's Sewage Management Facilities (SMF) team when they are on-site conducting inspections. Topics include how to use treated water, how to up-keep systems so they do not fail and what alternative systems are like. Further educating owners of properties who have no alternative to pump-out systems could lead to confusion and frustration. The Sewage Management Facility Team continue to modernise information relating to the many types of on-site sewage management facilities and publish this information to Council's website. Council now includes information pertaining to a property's onsite sewage management facility (where applicable) as part of conveyancer's information packages for the purchase of property.

4. How the revised Development Control Plan will provide more flexibility to the owners of the new dwellings who would like to explore alternatives to pump-out

The revised Development Control Plan includes the following comment – "Amendments to the Effluent Control section of the draft Development Control Plan to reflect Council resolution are being investigated".

5. The information that Council provides to homeowners concerning inspections

A copy of the letter and associated information that is sent out to homeowners in regard to on-site sewage management system inspections is attached as Attachment 2 to this report.

COMMUNITY ENGAGEMENT

The issues raised in this report concern matters which do not require community consultation under Council's Community Engagement Policy.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

Council has undertaken a survey to gain an understanding of homeowner's attitudes in regard to the various aspects of Domestic Sullage. As detailed in the report, opinions have been provided in regard to the elements of cost, service, connection to sewer, a waste water study and education.

This report includes detailed information regarding cost and the possibility of a review of Council's sullage service and alternative pricing structures. The report includes a recommendation to enter into discussion with Sydney Water regarding any plans to extend their sewer network, and makes a recommendation for a waste water study to be undertaken. In regard to education, as referenced in the report, Council has various education resources available for homeowners to refer to and will continue to provide ongoing education as new technologies emerge.

Discussions with Sydney Water and the review of the service provided by Council, including options in regard to the new basis for a new contract in 2023, will provide the basis for information relevant homeowners. It is therefore recommended that appropriate and targeted engagement is undertaken after a report on these matters is considered by Council no later than June 2022.

CONFORMANCE TO THE HAWKESBURY COMMUNITY STRATEGIC PLAN 2017-2036

The proposal is consistent with the following Focus Area, Directions and Strategies within the CSP.

Our Environment

- 3.1 The natural environment is protected and enhanced Value, protect and enhance our unique natural environment
 - 3.1.1 Encourage effective management and protection of our rivers, waterways, riparian land, surface and ground waters, and natural eco-systems through local action and regional partnerships.
 - 3.1.2 Act to protect and improve the natural environment including working with key agency partners.
 - 3.1.3 Minimise our community's impacts on habitat and biodiversity and protect areas of conservation value.
 - 3.1.4 Use a range of compliance measures to protect the natural environment.
- 3.4 The sustainability of our environment is improved Encourage and enable our community to make sustainable choices

FINANCIAL IMPACT

There are direct financial implications applicable to this report, the extent of which will depend on the course of action determined to be taken in regard to the various matters raised in this report.

The provision of any subsidy of the sullage charge is not provided for in Council's Long Term Financial Plan. The total cost to Council is \$1,053,868 for a 50% subsidy, \$526,934 for a 25% subsidy and \$210,774 for a 10% subsidy. The applicable cost would be budgeted as an expense, thereby reducing funds available for other Council programs and projects. The cost would apply annually, and will progressively increase over time in line with increases in the charges.

The cost of engaging a consultant to prepare education material is estimated to be in the up to \$20,000 and is not included in the 2021/2022 adopted Operational Plan and would require a variation in the appropriate Quarterly Budget Review Statement.

FIT FOR THE FUTURE STRATEGY CONSIDERATIONS

Depending on the course of action determined to be taken in regard to the various matters raised in this report, actions may not be aligned with Council's long term plan to improve and maintain organisational sustainability and achieve Fit for the Future financial benchmarks. Some actions may require the allocation

Meeting Date: 23 November 2021

of additional financial and staffing resources which are currently not budgeted for in the Long-Term Financial Plan.

ATTACHMENTS:

- AT 1 Council Report, Item 119, Domestic Sullage, (Ordinary 29 June 2021).
- AT 2 Letter to Homeowners Regarding onsite Sewage Management System Inspection.

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

AT – 1 Council Report, Item 119, Domestic Sullage, (Ordinary 29 June 2021)

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

CITY PLANNING

Item: 119	CP - Domestic Sullage - (95498, 112179)
Previous Item:	106, Ordinary (26 May 2020)
Directorate:	City Planning

PURPOSE OF THE REPORT:

The purpose of this report is to provide a response to Council's Resolution from its meeting on 26 May 2020 concerning the NM3 - Collection of Domestic Sullage.

EXECUTIVE SUMMARY:

Concerns have been raised regarding the resident-incurred costs associated with effluent pump-out services and the need to educate and promote alternate on-site sewage management facility types.

This report provides a response to the various elements of information requested within the Notice of Motion. The report recommends that Council note the information provided and that Council continues to lobby the State Government regarding potential subsidies and provide educational material to the community.

RECOMMENDATION:

That:

- 1. Council note the contents of the report regarding Domestic Sullage:
- Council continue to lobby the State Government for rebates for residents or subsidies for Council to be able to pass on savings to residents for effluent pump-out services to homes that cannot be connected to a reticulated sewage system (sewage main).
- The Council's Sewage Management Facility team continue to modernise information relating to the many types of on-site sewage management facilities and publish this information to Council's website.
- Council include information pertaining to a property's onsite sewage management facility (where applicable) as part of conveyancer's information packages for the purchase of property.
- 5. A further report be provided with alternate pricing structure options including user pay.

BACKGROUND

This report is in response to the Notice of Motion NM3 - Collection of Domestic Sullage resolved by Council on 26 May 2020:

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

"That:

- Identify and investigate alternative commercially viable and environmentally sound options for our community in relation to the pump out and collection of domestic sullage, and report the results to Council.
- It is envisaged that this would involve work with the community to promote and implement any such alternative options."

The Notice of Motion requested information on a number of matters including but not limited to:

- Information about properties that have pump out systems, numbers and locations
- How other Councils deal with pump outs
- Council charges
- Alternate systems and costs
- Community education

Residents within the Hawkesbury currently pay pump out rates significantly higher than the adjoining Blue Mountains City Council Local Government Area, due to the subsidies that State Government pay to the relevant landowners in these areas.

While Council has made representations to the local Member regarding this matter, to date we have not been successful in obtaining any subsidies for Hawkesbury residents.

There are now a number of examples where individual land owners across the State, including those living on some tiny inner-city sites, have been able to treat all of their waste on site and avoid the need to connect to an outside sewerage service.

Further concerns were also raised regarding the ongoing costs incurred by Council regarding effluent pump-outs being treated at Council's sewage treatment facilities.

Relevant Legislation

- Water Industry Competition Act (WICA)
- Part 3, Division 2 (Sections 56-66) of the Local Government Act 1993
- Protection of the Environment Operations Act 1997 and regulations under it
- Local Government (General) Regulation 2005
- Onsite Domestic Waste Water Management AS 1547/2012 (Standard)
- The Hawkesbury Development Control Plan. Section 1.18 of the Hawkesbury Development Control Plan states, in relation to effluent disposal: 1.18 EFFLUENT DISPOSAL Aim (b) To ensure that there is adequate land for onsite effluent where land is not services by reticulated sewer. Objectives ¬ Connection to reticulated sewerage is required for all forms of residential development, apart from single dwellings and rural dual occupancies.

DISCUSSION

Introduction: Types of on-site sewage management facilities

Properties in rural, rural residential or in small villages that are not connected to the sewerage system require an on-site sewage management facility.

The type of on-site sewage management facility a property can have is determined by standards relating to ground type and other factors. Though many properties can utilise alternative on-site sewage management facilities, anecdotal information indicates that many residents opt for a sewage pump-out service because alternatives require a higher degree of maintenance and/or pose a higher risk of failure and non-compliance.

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

Types of on-site sewage management facilities are:

- Effluent pump-outs (conventional gravity system or pressure sewerage system)
- Septic tanks with adsorption trenches or evapotranspiration beds;
- Aerated wastewater treatment systems,
- Composting units
- Reed beds, sand filters and mounds

These systems ensure that all wastewater from kitchens, laundries and bathrooms is disposed of safely. This is important to prevent pollution and the spread of disease. Owners of properties with an on-site sewage management facility have responsibilities to ensure they are maintained and in working order. Property owners and Council must work together to make sure septic systems do not pollute our waterways or cause contamination or health risks.

On-site sewage management facilities in the Hawkesbury Local Government Area

The table below shows the types of sewage management systems in the Hawkesbury along with the number of properties that have that type of system.

Table 1 – Number of types of systems in the Hawkesbury Local Government Area

Septic Management System Type	Number of properties
Effluent pump-outs (conventional gravity system or pressure	790 residential
sewerage system)	36 commercial
Septic tanks with adsorption trenches or evapotranspiration beds;	3,723
Aerated wastewater treatment systems,	2,339
Reed beds, sand filters and mounds	27
Composting units (wet or dry)	17

Effluent pump-out systems:

Hawkesbury City Council provides a sullage collection, transport and disposal service to 790 residential and 36 commercial premises within the Hawkesbury Local Government area. These properties are not connected to a reticulated sewerage system (sewer main).

Attached as Attachment 1 to this report is a map showing the locations of these properties in the local government area.

The following addresses each element or question raised within the Notice of Motion.

The number and general locations of these properties

There are currently 790 domestic properties with an effluent pump-out system being utilised. A large number of these properties are located in:

- Bowen Mountain (largest concentration)
- Cumberland Reach
- Ebenezer
- Freemans Reach
- Kurrajong
- Kurrajong Heights
- Kurmond
- North Richmond
- Sackville

ORDINARY

Item: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

- Wilberforce
- Vineyard
- Others scattered across the Local Government Area

The size of these properties and an indication of why they require this particular type of system

Lot sizes with effluent pump-out systems in the Hawkesbury Local Government Area range from 400sqm to over 3,000sqm.

Any property that cannot be connected to a reticulated sewage system (sewage main) must have a compliant on-site sewage management facility. The type of on-site sewage management facility a property can have will be dependent on a variety of factors including, but not limited to characteristics described in the table below:

Table 2 – Land characteristics determining type of sewage management facility

Land characteristics	
Lot Size	
Slope gradient	
Soil depth and stability	
Soil category	
Depth to seasonal water table	
Duration of continuous seasonal soil saturation	
Dispersive soil	
Content of stones, cobbles or boulders	
Climatic factors	
Proximity to waterways	

In some situations, lot owners also have the ability to select their preferred type of on-site sewage management facility, given they remain compliant with legislation and standards. Though many properties can utilise alternative on-site sewage management facilities, many residents opt for a sewage pump-out service because alternatives require a higher degree of maintenance and/or pose a higher risk of failure and non-compliance.

Properties in locations such as Bowen Mountain which are located on solid rock do not have any alternatives to pump outs. This is based off the criteria shown in table 2 of this report. Given the water cannot be absorbed by dirt and other ground matter, the water will pool underground and cause hazards to property footings resulting in landslips, rising damp and swamp-type conditions.

How pump-out charges are determined

Council provides this service through an agreed contract with Staples Premier Pumpouts. Residents are charged for the service on a full cost-recovery basis by Council as no state government or Sydney Water rebates can be accessed by these residents. The fees for domestic sullage pump out services listed in Council's 2020/2021 Fees and Charges

- \$2,505.16 per year for a fortnightly pump out service
- \$5,010.32 per year for a weekly pump out service

While all residents have the option of acquiring their own pump out service directly with another supplier, no residents in the Hawkesbury have taken that option. Council is able to obtain the most cost-efficient prices through economies of scale for all residents who require a pump-out service. Council has lobbied on a number of occasions for rebates from State Government and Sydney Water, to no avail (lobbying efforts detailed later in this report).

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

Research into the costs associated with treating effluent pump-outs at Council's sewage treatment facilities have also shown there would not be significant savings to be realised if the sullage was treated elsewhere, given the majority of effluent treated at these facilities comes from the reticulated sewage system (sewage main).

At the Council briefing held on 22 June 2021, questions were raised about an alternative potential pricing structure, which could also include a user-pay model. It was determined that a further report would be completed to address this.

Possible alternative on-site treatment systems, including cost comparisons to pump-out

Residents with other types of on-site sewage management facilities (not effluent pump-out) do not incur the ongoing cost of paying for a pump-out service, as their wastewater is treated by their system in various ways dependent on their system type.

While Table 2 shows there are a number of properties that have these types of onsite sewage management facilities, these properties also comply with the Onsite Domestic Waste Water Management AS 1547/2012 standard and relevant legislation. Though some properties currently utilising an effluent pump-out system would also fall into these categories, the costs to convert/decommission their pump-out system and set up an alternative system are generally viewed as prohibitive.

Further, many of these types of systems (in particular, composting units, reed beds, sand filter mounds and worm farms require a high level of dedication and effort on the part of the property owner to maintain in working and compliant order. Even with a high level of dedication, user-error can result in system failure which can then lead to extensive contamination of land application areas. These types of systems can also have a negative effect on property resale value, as it can limit the number of potential buyers. A desktop review (online) found price ranges for system types as below:

- Effluent pump-outs (conventional gravity system or pressure sewerage system)
 Approximately \$2,000 \$3,000 plus installation, excavation and material costs plus annual fee of \$2,026.16 for the pump-out service through Council.
- Septic tanks with adsorption trenches or evapotranspiration beds;
 Approximately \$4,000 \$6,000 plus trenching at approx. \$100 per meter, plus installation, excavation and material costs plus ongoing costs.
- Aerated wastewater treatment systems,
 - Approximately \$7,000 \$14,000 plus installation, excavation and material costs plus ongoing costs.
- Irrigation systems
 - A wide approximate range from \$200 \$8,000 dependent on multiple factors including ground/soil type, land size plus ongoing costs.
- Composting units, reed beds, sand filters and mounds

 A wide approximate range from \$200 \$30,000 plus ongoing costs.
- Worm farm systems
 - \$13,000 \$25,000 Treated water has to be disposed of via sub-soil an application which has to be done more than 300mm underground. These systems are also highly susceptible to failure for a range of reasons including but not limited to temperature change, chemical sensitivity, and flooding.
- Dry composting systems also exist, with high costs that are very dependent on property type and are unpopular due to the level of direct maintenance by the property owner, odour and flies.

ORDINARY

Item: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

Further, if a resident has an effluent pump-out system installed on their property and wished to change to one of the abovementioned systems, there would also be a cost to empty and decommission their existing system.

If a property has an existing system that fails or the owner fails to service their system regularly (must show proof), Council can and does force owners to convert their systems to a pump-out service. This is a rare occurrence, but is in the best interest of environmental and public health.

There are examples around Australia of property owners attempting, and in some circumstances being successful in going "off grid". An example of this is the famous Michael Mobbs 'green house' in Chippendale (City of Sydney Local Government Area). Michael Mobbs utilised many green ideas to completely take his home off the grid and manage it in a sustainable way. In terms of his waste water, Michael treats this water utilising a unique and purpose-built aerated wastewater treatment system, which also treats the water with other filtration methods including sand and UV lights. NSW Health would determine this system as a 'unique' system and has allowed it to be used for water re-use for washing clothes and flushing toilets for the purpose of research. The reused water may be safe for healthy people to be around; however those with compromised immune systems could potentially face severe health risks with a system like this.

Environmentally vulnerable areas of the Hawkesbury protected by pump-out systems

- Locations of wetlands and other ecologically sensitive areas;
- Whether there is any protection afforded to downstream seafood growers, by the number of pump-out systems in the Hawkesbury; and
- How pump-out systems might protect the quality of the water being treated by the drinking water filtration plant at North Richmond.

As shown in the attached map, many properties who subscribe to Council's pump-out service are located along wetlands and other ecologically sensitive areas.

The efforts of Council's Sewage Management Facilities (SMF) team are to ensure sewage on private property does not result in dangerous levels of water and food contamination and outbreaks of disease. They deliver the Septic Safe community health program to inspect and identify septic systems in the community and keep them working well. This provides protection to all users of the river, including farms and seafood growers.

- An estimate of the reduction in operating costs to the sewage treatment plant/s that receive the sullage from our pump-out systems if it was to be treated elsewhere
- An estimate of any changes in the foreshadowed cost of future upgrades/maintenance needed to our sewage treatment plants if domestic sullage was treated elsewhere

An investigation to determine if there would be a reduction in operating costs to the sewage treatment plants that receive the sullage from our pump-out systems if it was to be treated elsewhere was undertaken. An investigation to determine if there would be any savings in the foreshadowed cost of future upgrades/maintenance needed to our sewage treatment plants if domestic sullage was treated elsewhere was also undertaken.

Currently, sullage collected from septic systems are treated at Council's sewage treatment plants. There would be little to no impact on the operating costs to Council's sewage treatment plants at South Windsor and McGrath's Hill if the sullage from pump-out services were treated elsewhere. The reason for this is that these treatment facilities also treat wastewater from properties connected to the reticulated sewage system (sewage main).

Further, costs to divert sullage from our pump-out service to other treatment plants (for example, Sydney Water treatment plant at North Richmond) would not see any significant discounts for property owners. Their charges equate to a saving of \$43.00 per annum based solely on their published fees and charges, which do not take into account any administrative or other etc. costs of diverting sullage to their treatment plants.

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

• The evaluation of Council's current policy on collection of domestic sullage (Policy No. PES0001Z). This policy is dated 14 March 2000 and is in need of review and updating.

While this policy has been updated, it is currently being reviewed as part of an overarching review of Council's policies, which will be reported back to Council in 2021.

- How other councils manage pump-out services
- Their charges and their specifications for needing to have a pump-put system
- Whether there are any options for sharing contracts for pump-out services

Under the legislation, Councils have no obligation to provide the Effluent Collection and Disposal Service to residential or commercial premises. Because of this, most councils have ceased providing this service to residential and commercial customers. The nearest council area continuing to provide the service is Blue Mountains City Council. However due to the small number of properties continuing to receive the service in that area, there is a lack of economy of scale to see a benefit in sharing the contract with them.

Research into how other councils deal with and charge for pump-out services has shown that other than Hawkesbury City Council, Blue Mountains City Council and Hornsby Shire Council are the only councils in metropolitan Sydney providing pump-out services. Further, Hornsby Shire Council only provides emergency pump-out services for failing systems. Because of this, there are no other councils Hawkesbury could work with to share a contract for pump out services which would be of financial benefit.

Other charges and their specifications for needing to have a pump-put system

All properties across Australia that cannot be connected to a reticulated sewage system (sewage main) must comply with the Australian/New Zealand Standard for on-site domestic wastewater management (AS/NZS 1547:2012).

What sort of support, if any, other Councils get from the State or Federal governments for their residents who have a pump-out system?

Blue Mountains City Council

As part of the Sydney Water Priority Sewerage Program the Blue Mountains City Council area was largely connected to reticulated sewer. Only **15** properties were found not to be economical to sewer and a decision was made to leave these on a pump out system, with Sydney Water subsidising the pump out cost.

Pump out of these properties is undertaken by Blue Mountains City Council, at cost, and billed to the resident who then seeks a rebate from Sydney Water.

Sydney Water rebate the difference between their normal sewer charge (Currently \$335.00).

A cost comparison of current charges between Blue Mountains City Council and Hawkesbury City Council is tabled below. The significant difference is attributed to the lack of economy of scale.

Council	Residential Service per annum (fortnightly service) 2020/2021	Commercial Service (\$/ kl) 2020/2021
Hawkesbury City Council	\$2,505.16*	\$22.31
Blue Mountains City Council	\$8,190.00** / \$335***	\$48.00

*6000 litres max. per pump out

- **Cost before subsidy and using 4,000 litres per pump out
- ***Cost after subsidy and using 4,000 litres per pump out

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

Lobbying ٠

Council staff have, on multiple occasions, lobbied State government for further rebates for residents having to pay for their effluent pump-out services including:

A Mayoral Minute from 12 May 2020 (MM - Inequitable and inconsistent application of the NSW Environment Protection Authority Waste Levy - 80093) also raised this issue. Letters were sent on 1 June 2020 lobbying for waste levy reductions and also included points regarding the Sydney Water rebate provided to Blue Mountains residents using a sewage pump out service specifically directed.

The letter was sent to:

- Robyn Preston MP
- NSW Environmental Protection Agency (Tracey Mackey)
- Minister for Energy and Environment (Matt Kean)
- NSW Treasurer (Dominic Perrottet)

Robyn Preston MP

Correspondence sent by Ms Preston to Melinda Pavey MP – Minister for Water, Property and Housing to Robyn Preston MP generated the below response (excerpt) dated 25 January 2021:

"There is no NSW Government or Sydney Water policy of subsidising septic pump out charges for residents living in Sydney water's water supply catchments. Nor is there any plan to introduce such a policy

The Blue Mountains septic pump-out rebate Mr Conroy refers to is a legacy of a specific Government Direction to Sydney Water in 1988...

NSW Environmental Protection Agency (Tracey Mackey) No response received

Minister for Energy and Environment (Matt Kean) A meeting was held on 13 July 2020 with Minister Kean, Clr Barry Calvert (then Mayor), Clr Mary Lyons-Buckett (Deputy Mayor), Peter Conroy (General Manager), Clr John Ross and Clr Amanda Kotlash. Further from this meeting, written correspondence was sent to the Minister further justifying the need for the Hawkesbury Local Government Area to be reclassified as a Regional (waste) Levy area.

A letter received from Minister Kean on 11 May 2021 did not specifically mention subsidies for pump-out services, however it noted that the waste levy and grants for waste infrastructure would be detailed in the State Government's 20 Year Waste Strategy (to be finalised).

Education Program

Council's Sewage Management Facility Team (SMF) conduct inspections on all on-site sewage management facilities in the Hawkesbury Local Government Area. While on site, members of this team educate residents on how to manage their systems properly so they remain operational and compliant with standards and regulations.

Often residents speak to the team about the costs associated with pump-out systems while they are on site. During these inspections the staff provide resident with brochures which detail how each of the systems work.

The team also educates residents on measures they can take to help keep costs of services down, including ensuring that the pump-out contractor can access their system with ease, thus reducing the time they spend on site and keeping costs down.

The team is currently working on modernising these brochures, with a view of having this information published to Council's website.

ORDINARY

Item: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

Informing potential buyers of property prior to purchase

Through informal feedback, Council has learnt that many potential buyers of properties are unaware of the onsite sewage management facility on the property they are looking to purchase. This poses a great issue particularly for people who have been used to living at properties connected to a reticulated sewage system (sewage main).

A possible solution for this is for council staff to include information about a property's onsite sewage management facility as part of information packages provided to conveyancers acting on behalf of property purchasers.

FINANCIAL CONSIDERATIONS

Currently, the expenditure incurred to provide the Effluent Collection and Disposal Service is fully funded by annual charges collected. Both income and expenditure associated with this service is maintained through the internally restricted Sullage Reserve.

Council could consider cross-subsidising this service to reduce the annual charge, but as all households incur some costs associated with sewage this poses equity issues. For example, if subsidised, a household connected to Council's Sewerage System will pay annual charges for that service, but also receive a reduced level of other Council services as a result of subsidising the Sullage Service.

COMMUNITY ENGAGEMENT

Council's Sewage Management Facility Team (SMF) conduct approximately 240 inspections per month for on-site sewage management. During these inspections, the SMF team use the opportunity to provide information and education about the resident's on-site sewage management facility. Approximately 70% of residents are also interested in learning about alternative options which may be available and the team members provide this information, having considered the property specifications and constraints.

The team also educates residents on measures they can take to help keep costs of services down, including ensuring that the pump-out contractor can access their system with ease, thus reducing the time they spend on site and keeping costs down.

The team is currently working on modernising the information brochures, with a view of having this information published to Council's website.

CONFORMANCE TO THE HAWKESBURY COMMUNITY STRATEGIC PLAN 2017-2036

The proposal is consistent with the following Focus Area/s, Direction/s and Strategies within the CSP:

Our Environment

- 3.1 The natural environment is protected and enhanced Value, protect and enhance our unique natural environment
 - 3.1.2 Act to protect and improve the natural environment including working with key agency partners.
 - 3.1.3 Minimise our community's impacts on habitat and biodiversity and protect areas of conservation value.
 - 3.1.4 Use a range of compliance measures to protect the natural environment.

FINANCIAL IMPACT

There are no financial implications applicable for this report.

ORDINARY

ltem: 119

Meeting Date: 23 November 2021

ORDINARY MEETING

SECTION 3 – Reports for Determination

Meeting Date: 29 June 2021

FIT FOR THE FUTURE STRATEGY CONSIDERATIONS

The proposal is not currently aligned with Council's long term plan to improve and maintain organisational sustainability and achieve Fit for the Future financial benchmarks. The proposal will require the allocation of additional financial and staffing resources which are currently not budgeted for in the Long-Term Financial Plan.

ATTACHMENTS:

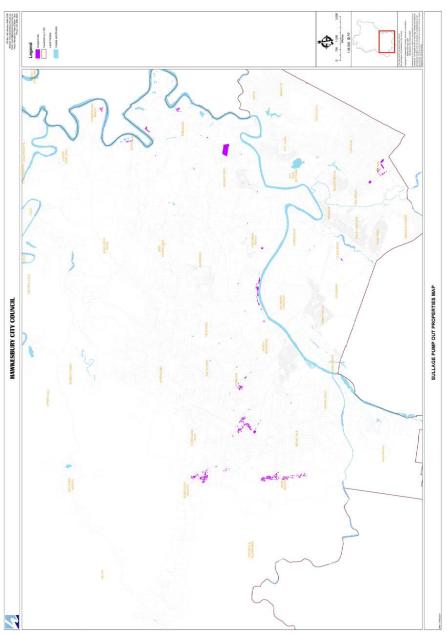
AT - 1 Map of locations of pump-out systems in the Hawkesbury Local Government Area.

ORDINARY

Item: 119

Meeting Date: 23 November 2021

ORDINARY MEETING SECTION 3 – Reports for Determination Meeting Date: 29 June 2021



AT - 1 Map of locations of pump-out systems in the Hawkesbury Local Government Area

0000 END OF REPORT 0000

ORDINARY

ltem: 119

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021

AT – 2 Letter to Homeowners Regarding onsite Sewage Management System Inspection

366 George Street, (PO BOX 146)

council@hawkesbury.nsw.gov.au

Windsor NSW 2756 PH: (02) 4560 4444 FAX: (02) 4587 7740

DX 8601 Windsor

hawkesbury.nsw.gov.au City Counci

Hawkesbury

Our Ref: <Prop No.>

<Date>

<Owner's Name> <Postal Address> <Suburb State Postcode>

Dear Sir / Madam

On-site Sewage Management System Inspections

<Property Address>

Hawkesbury City Council is conducting inspections of on-site sewage management facilities in your area. This is so Council can issue an approval to operate which will outline standards and conditions of the operation of your septic system.

The Local Government (General) Regulation 2005 specifies performance standards for on-site sewage management activities (Clause 44) and requires landowners whose premises are not connected to a reticulated sewerage system and who operate their own system of sewage management, to do so with council approval.

For the current financial year an inspection fee of \$160.10 per system is being charged to partially cover the inspection and administration costs to Council. Hawkesbury City Council has endeavoured to keep the cost at a minimum and the fees are comparatively lower than other councils.

Please make an appointment within 14 days from the date of this letter so that Council officers may conduct your inspection. Please ensure that clear access to your on-site sewage management facility is available. If it is an AWTS and it requires servicing ensure that it is completed before the inspection. Should the system fail in anyway and requires a re-inspection then a re-inspection fee of \$96.10 (for the financial year) will be charged.

Hawkesbury City Council understands the enormous strain that the bushfires, floods and Covid-19 (novel coronavirus) have and are placing on some communities within the City. If you are experiencing financial hardship, Council would like to work with you to develop a plan to assist you. If you are in any of these situations please email us at council@hawkesbury.nsw.gov.au, or call us on (02) 4560 4444.

Please contact Council's Customer Service Staff on (02) 4560 4444 to make an inspection appointment. You can make payment for the inspection at the time of booking or be invoiced once the inspection has been carried out.

If you have any further enquiries regarding this matter please ask to speak to a member of the Septic Safe Team.

Yours faithfully

SMF Team | Regulatory Services | Hawkesbury City Council

👬 Inlerpreter Service available, call 131 450 م لحيت المريرينا تبدغ رفبونت Inlerpreter Service available, call 131 450 الجريت المان المريزين المان ا

SECTION 3 – Reports for Determination

Meeting Date: 23 November 2021



A guide to Hawkesbury City Councils Approval to Operate Inspection program

Why is it important to have my on-site sewage management system inspected by Council?

A State Government survey of on-site sewage management (OSSM) systems in NSW showed that up to 70% of systems were experiencing some type of failure.

As a result the NSW State Government developed legislation which stipulates that every OSSM system in NSW should be inspected to ensure it is not having an adverse impact on the health of people or the surrounding environment. Hawkesbury Council estimates that there are over 9,000 on-site sewage management systems within the Hawkesbury Local Government Area.

What should I do to prepare for my approval to operate inspection?

To prepare for your Council inspection please ensure that:

- Safe access is provided to the tank(s) and effluent disposal area.
- 🧭 The area around the tanks and the effluent disposal area has been mowed.
- of Dogs and any other animals or stock have been secured or locked up.

If I own an Aerated Wastewater Treatment System (AWTS) and pay a service agent to service my system quarterly do I still need to have an inspection done by council?

Yes. At this point in time the Council inspection is one of the only quality control regulators of this industry. Service agents are not licenced or regulated by any Government body. Inspections are undertaken by SMF Technical Officers from council to check the adequacy of the system as a whole and to ensure that the system is not impacting on public health or the environment.

What happens if my septic system is failing?

A Council officer will work closely with you to ensure that you understand why your system is failing and how to fix it. If your on-site sewage management system is failing, Council will send correspondence under the Local Government Act 1993 with the required works to rectify the system.



Frequency of Inspection

All on-site sewage management systems are required to be registered with Council. Each system will be assessed and once passed will be categorised into low, moderate or high risk.

Inspection categories are allocated based on the type of system, the age of the system and any environmental and health risks associated with the site.

Upon a satisfactory inspection council will issue an approval to operate to the owner for the system. This approval will detail the renewal date and conditions for safe operation and maintenance of your system.



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