

SUBMISSION TO ESCOSA ON IMPACT OF LEGISLATIVE CHANGES TO SMALL SCALE NETWORKS

I am a householder living in Tea Tree Gully (TTG) in an area served by the TTG Council Community Wastewater Management System (**CWMS**). The CWMS is an ageing infrastructure: pipes constantly block or fracture raising many concerns amongst the community, including the very real risk to public health. I offer below an example of what can happen when blockages occur.

I live at the highest point of [street redacted], Banksia Park: the house lying below mine is at roof level with my garden. On three separate occasions this year, raw sewage dripped onto the patio of my neighbour from a Council pipe situated on my land and Council workmen spent many days trying to source the blockage and taking remedial action. The smell of raw sewage over this time was appalling. The blockage was undoubtedly due or exacerbated by the subdivision and building, in the last two years, of up to 10 substantial new houses on land below my own and that of my neighbour. All the new properties have been connected to the existing CWMS adding to the pressure on an already substandard system.

I have written to both state government and the Mayor of TTG and urging the case for all properties on the CWMS network to be transferred over to the main SA sewage system. I also suggested a moratorium be placed on any new subdivisions until the matter is resolved. The response I received from the Minister for Environment and Water was that government maintains that the matter is the responsibility solely of the Council.

I disagree as do most of the members of the community I speak to. My point about subdivision of properties was ignored.

The present policy of both state and federal governments (and councils) is to support higher density housing in existing urban areas thereby hoping to avoid further urban sprawl. All three entities would benefit monetarily from this policy (an increasing population means more revenue raised from taxes and rates).

As I understand it, the legislative changes to the small/minor licensed operators of such services as sewage, means that TTG Council would be required to set prices appropriate to full costs recovery for the service it provides. But the transition costs of moving an estimated 4,500 houses onto the main sewage system could be exorbitant. Furthermore, apportioning costs to households could lead to dispute amongst neighbours and anger in the community. For example, those houses closest to an existing SA outlet would be cheaper to transition than those lying further away. The community could also legitimately pose the question: Who benefits most from a move from the CWMS to mains sewage?

If government envisages continuing to support density housing in areas serviced by the present CWMS then it should be prepared to fund any necessary infrastructure that facilitates this policy rather than looking to outsource costs. Existing ratepayers who transition may well benefit from a more secure sewage system, but at the same time will lose far more from higher density housing. That is more cars, more pollution, more noise, further loss of open space, all the many irritants they hoped to avoid by moving to the TTGully Council area in the first place.

In short, any legislative change that seeks to impose full cost recovery on existing rate payers for any project or network which should rightly be a cost to central government, is to be deplored.

S Kaye

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