

Inquiry into regulatory arrangements for small-scale water, sewerage and energy services.

Thank you for informing me about ESCOSA's Draft Inquiry Report. In light of recent developments to Tea Tree Council's (TTC) Community Wastewater Management System (CWMS) I would like to add the following to my previous submission to ESCOSA.

In a letter to a constituent dated 29 June, 2020 the Minister for Environment and Water stated he had directed SA Water to transfer all properties currently connected to the CWMS onto SA Water's main sewage system: further that "Importantly, you will not be required to pay for the cost associated with fixing this long-standing issue, and this critical work will get underway within 12 months." The Minister went on to say this decision "will see significant benefits Including state-wide sewerage pricing and lower prices".

My understanding of the word "critical", when used in the context of a piece of public infrastructure which government has recognised as substandard, means that work to rectify the problem needs to be undertaken as a matter of urgency. The community, therefore, does not understand the Council's apparent continuing involvement in the transition rather than SA water taking control.

Since Minister Spiers' letter was received, some residents attended TTG Council meetings when Councillors were presented with plans suggesting the Council will upgrade the current system before divesting to SA Water and that transition will take some unspecified years to complete (even 10 years has been mooted!) Furthermore, there was mention of developer involvement in the funding arrangements. At a Council meeting in 11 August a motion to "request a full State Government contribution (net of developer contributions) towards Council's pilot upgrade to mains standards currently planned for SA approved Glenere Drive, Modbury and Dawson Drive Modbury" was passed.

I have written to Minister Spiers to explain my worry that instead of the critical work of transition being planned by SA Water as one complete operation encompassing all properties currently on CWMS there will be a piece-meal development driven approach. Mr. Spiers response to my letter was not reassuring. He explained that it may not be possible to complete all works at once with some possible prioritisation required.

It would be understandable that possible prioritisation may be needed if CWMS pipes in a particular street or suburb were so compromised that urgent work was certainly required. But a piece-meal approach in any other circumstance (i.e. redevelopment) would mean that those residents in suburbs where redevelopment is not appropriate will be left to pay, presumably, the full-cost recovery envisaged by Council's proposed fee increases, This would be most unfair.

The Council's continuation of its programme of further development in CWMS areas is certainly a worry for residents. Within the last month development has begun on a vacant piece of land situated on Elizabeth Street, Banksia Park. The land area is very large and would be capable of containing possibly 15-20 new dwellings. Residents have been unable to confirm if the site is already connected to mains sewage, will be connected to CWMS or is one of the Council's "pilot" upgrades. About 7 house blocks have been cleared, subdivided and already up for sale on streets between North East Road and Milne Road. These streets are currently on septic tanks.

We all understand the imperative for more housing stock but not at the expense of existing households who are waiting for conversion to mains sewage. I would go further and say development in CWMS areas before transition would be completely illogical and will only add to the

eventual costs of the overall project. And there are many question marks about costs which remain unanswered.

The Council originally costed the work at \$92 million and the State Opposition have committed this sum of money if they are next in government. The State government's commitment is much lower at \$65 million. I have myself sought an explanation from State government about the shortfall but have only been advised that further details of timing and other aspects of implementation will be made publicly available soon.

We are now, however, informed (via page 12 of Edition 92 of the latest TTG Council's community magazine "Grapevine") that the State Government has "requested" ratepayers contribute towards the upgrade thereby contradicting the information in Mr. Spiers' letter of 29 June, 2020. I received my copy of "Grapevine" just a few days ago.

What is the community to make of all this?

S Kaye

30 September, 2020