

21 March 2022

The General Manager
Latrobe Council

By email: submissions@latrobe.tas.gov.au

Dear General Manager

Submission – Latrobe Draft Local Provisions Schedule

We refer to the Latrobe Draft Local Provisions Schedule (**Draft LPS**), specifically to the increased load on the already inadequate Port Sorell Sewerage Treatment Plant that will occur due to areas of Port Sorell and Shearwater which are not currently subdivided for residential use being zoned as Future Urban and General Residential.

While we have no general objection to the limited additional residential subdivision in the areas shown in the Draft LPS as Future Urban and General Residential, no further residential intensification of the area should be permitted until there is sewerage treatment infrastructure capable of effectively dealing with the increased sewerage load.

Port Sorell Sewerage Treatment Plant – Tasmania’s worst

The existing Port Sorell STP is a lagoon style STP discharging (ostensibly) secondary treated sewage from a very short pipeline directly to the low water mark on the foreshore at mouth of Port Sorell. The STP was designed and constructed in the 1980s for a very much smaller population in the Port Sorell area.

In 2019-2020 Port Sorell STP discharged 357 million litresⁱ of sewerage to the Port Sorell near-shore waters. The vast majority of this sewerage was not sufficiently treated – Port Sorell STP was the worst performing sewerage treatment plant in Tasmania in every one of the last 5 years. It complied with its EPA regulatory requirements only 41.8% of the time in 2019-2020 and in some years as rarely as only 27.1% of the timeⁱⁱ. The quality of sewerage discharge into Port Sorell was in accordance with the Accepted Modern Technology (AMT) standard less than 37% of the time each year for the last 5 years.ⁱⁱⁱ

Despite the fact the Port Sorell STP has been polluting Port Sorell in breach of its regulatory standards and vastly below the AMT for the significantly majority of the time since at least 2009-2010^{iv}, inflows into Port Sorell STP have been allowed to increase by more than 25% between 2011^v and 2020^{vi}, from an average of 779kL of sewerage per day to 978kL. Taswater is now accepting inflows at Port Sorell STP in excess of its licenced inflow limit.^{vii}

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These figures almost certainly materially understate the problem. Despite an increased permanent population with recent residential development, the Port Sorell/Shearwater/Hawley Beach area remains a seasonal tourist destination, implying that the licence limit inflow exceedance, and discharge in breach of regulatory and AMT standards is likely to be much more significant during the busy summer months.

In short, even though Port Sorell STP is the worst performing sewerage plant in the State, even those figures underestimate the sewerage pollution being discharged to the popular swimming and fishing waters of one of the North West's most popular seaside holiday areas in summer when people are using those waters the most.

This poor performance from the plant is evident from the appalling odour it regularly emits, posing a health and safety risk to neighbours and workers on nearby properties.

No Planned Action from Taswater

Despite the fact that Port Sorell STP has so consistently failed to meet regulatory and Accepted Modern Technology standards, and is now exceeding average permitted daily inflows, Taswater's Capital Delivery Office has no published plan or strategy to take any action to replace the system or redirect it to a fit for purpose sewerage treatment facility, such as Pardoe long ocean outfall.

The Tasmanian Economic Regulator refers to planned desludging work at Port Sorell STP^{viii}. This work was completed in late 2019. While the 2020-2021 Report on the State of the Water and Sewerage Industry is not yet available, the regulatory and compliance results in 2019-2020 were still the State's worst despite half the year being post desludging. There has also been no improvement in the noxious odours from the site.

Fundamentally, maintenance desludging cannot overcome the problem of an outdated 1980's lagoon STP built for a tiny holiday community being unsuitable for the large permanent community that Port Sorell/Shearwater has become.

Disconnect between Latrobe Council and Taswater

The inflow load on the Port Sorell STP has continued to rise with intensifying residential development in the Shearwater area, despite more than a decade of gross underperformance of the Port Sorell STP. This highlights the disconnect between Latrobe Council in its role as consent authority in the area, and Taswater. Latrobe Council has no effective power to compel Taswater to invest in the type of sewerage treatment infrastructure necessary to service the area, and Taswater has no published apparent intent to do so.

Latrobe LPS

Once further areas of Port Sorell/Shearwater are zoned so as to permit further residential subdivision, further pressure will be placed on the Port Sorell environment through increased loads on the already unsuitable Port Sorell STP.

Development applications for subdivision will of course need to demonstrate that provision has been made for sewer service, however this will not extend to ensuring capacity of Taswater's STP. It is also not an issue confined to a single additional development.

The existing inadequacy of the Port Sorell STP for any further residential development should be recognised by the Latrobe LPS.

While the identified areas may be zoned in line with the Latrobe Draft LPS as Future Urban and General Residential, we submit that the Latrobe LPS should include a further condition that no further subdivision in Port Sorell/Shearwater/Hawley Beach be permissible until there is sewerage treatment infrastructure in place which is capable of accepting and processing sewerage from both the current development and that future proposed development.

Please feel free to contact us if you have any questions in relation to this submission.

Sincerely,



Derek Charge

Amanda Charge

ⁱ *Report on the State of the Tasmanian Water and Sewerage Industry 2019-2020*, Tasmania Economic Regulator, May 2021. Table A3.3.

ⁱⁱ *id.* Table A3.1.

ⁱⁱⁱ *ibid.*

^{iv} *Collectively Reports on the State of the Tasmanian Water and Sewerage Industry 2012-2013* through to 2019-2020, Tasmania Economic Regulator, Summaries of WWTP/STP discharge to waters compliance results tables.

^v *2012-2013 Report*. Appendix 2

^{vi} *2019-2020 Report*. Table A3.5

^{vii} *id.*

^{viii} *ibid.* at 6.3.1