4 March 2016

The Hon Mick de Brenni
Minister for Housing and Public Works
GPO Box 2457
Brisbane Qld 4001

Dear Minister

I wish to draw your attention to a long-standing issue impacting water and sewerage service providers in Queensland which are represented by the Queensland Water Directorate (qldwater). These warnings have been raised by our industry repeatedly without any evidence of appropriate consideration.

Mandatory Part 1.4 of the Queensland Development Code, which was developed under the pretence of encouraging development (particularly on small lots), has created a “time bomb” which will ultimately lead to major infrastructure failures, and the costs of those failures will be borne by those very customers the new provisions were supposed to help.

qldwater has carefully compiled details of the issues which must be addressed in consultation with our members. These, along with the history of amendments, are detailed in the attached Building Over Infrastructure Services Position Paper.

On behalf of our members, we believe your department must be challenged to justify its decisions and the cost/benefit analysis supposedly undertaken prior to commencement of the work. We have in the past sought to understand what exact costs were expected to be saved for home builders by reducing the opportunities for water and sewerage service providers to have input into construction processes over existing infrastructure, and have only ever been provided with vague, unsubstantiated examples.

At face value, a major policy and regulatory change has been made by the former State government, under a false premise of promoting development. We do not doubt that your predecessors have received customer complaints stemming from past referral processes, however have been given no opportunity to investigate the validity of these claims, and seen no evidence that the costs attributed to these concerns can possibly outweigh the costs customers will ultimately bear as assets fail as a result of these amendments. The end result is deliberate short-sightedness leading to an overstated direct cost to the community being shifted from the short to medium term and increased in the process.

Our members have requested that I include a clear example of the impacts of just one of these failures in future. When extrapolated across the state, and particularly to the larger urban areas of SEQ, it should be clear that the rights of infrastructure owners in protecting their assets must be better managed.

One qldwater member reported on a late 2015 sewer main collapse due to construction of a unit complex within the pipe’s zone of influence in the 1960s. The pipe has essentially been crushed, sewage is currently leaking around the complex, and the building is at risk. A number of solutions have been considered:
- Structural relining (feeding a new pipe inside the existing pipe) was not deemed possible because the 150mm main had lost more than 50% of its area meaning insufficient flows to manage peak demand. Relining would also not have prevented further collapse and so the need for future maintenance at difficult depths was extremely likely. (Access for machinery is a major issue)
- Relocation of the main to the footpath was discounted because of the significant cost to relocate service connections as well as issues with other utility services including high voltage electricity. (Safety for workers, customers and the general difficulty to develop solutions for older blocks with different design objectives when they were created are a major issue).
- Relocation of the main through the back yard would have required demolition of an existing driveway meaning major access disruptions for the complex, and greater costs.
- Relocation of the main along the fence line is currently being considered as the preferred option as removal of the fence (and trees) is most cost-effective. This has still led to an estimated project cost of $158,000, which does not account for damage to the building, if it happens, during repairs. (Demolition is not uncommon in these cases).

This example illustrates the fundamental importance of involving the water and sewerage service provider in assessment of structures near its assets, to evaluate not just the risk of damage to those assets, but also recognise that they have a limited life and future maintenance must be carefully planned. The industry faces an “infrastructure cliff” – billions of dollars in assets approaching the end of their useful life. Technologies are evolving to help address this need, however there is no magic, and all issues are made more complex in small lot situations.

To be clear, we are no longer proposing removal of the mandatory part of the Code. **We simply seek an audience where industry experts can put forward logical arguments to address the remaining deficiencies in the Code and have those arguments considered on a fair and constructive basis. We do not believe that the officers in the department who have steered the process to date are capable of that objective assessment.**

Thank you in anticipation of your consideration of this request.

Yours sincerely

Dave Cameron  
Chief Executive Officer  
*qldwater* - The Queensland Water Directorate