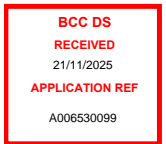




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14 November 2025

Brisbane City Council – City Planning and Economic Development Services
Attention Katrina Bogoevski
GPO Box 1434
BRISBANE QLD 4001

Dear Katrina

**RE: 409 PRIESTDALE ROAD, ROCHEDALE
BCC Ref A006530099 - INFORMATION REQUEST
26551.001 C L002, BRISBANE**

With reference to the Information Request dated 25/07/2025, and received as part of the Development Application, ADG is pleased to provide the following responses.

2. Stormwater

The submitted Civil engineering response refers to an updated Civil Engineering Report (ADG Ref 26551 C R001 Rev 02), however, this has not been submitted. Provide the amended report demonstrating on site stormwater quality and detention for the site, addressing the items below:

- a) Provide an amended Site based stormwater management plan (SBSWMP), including assessment of the existing downslope 1050 dia. drainage. The report is to demonstrate capacity, and provide detention as required in accordance with PO2/AO2.1 of the Stormwater code. It is noted that the adjoining site has no relevance to this application in that the flows from this proposed development will be in addition to the flows resulting from the adjoining approved developments. As such the flows generated by the proposed development application are to be considered and accounted for in the report.
- b) Provide an amended SBSWMP addressing major flow paths in accordance with PO2/AO2.1 of the Stormwater code. The proposal to address major flow paths at the Operational works stage is not supported. Capacity of the existing 1050 RCP needs to be determined under the current application to ensure that it can take the major flows from the site so as not to impact external downslope properties.
- c) Provide amended SBSWMP and plans to show a stormwater quality (SWQ) basin in accordance with PO6 of the Stormwater code. Referencing the adjoining development (A005513937) for water quality is not relevant to this application. Further, the proposal to provide SWQ by installing street tree pods is not supported.



ADG Response

- a) The upstream catchment contributing runoff to the existing 1050mm diameter stormwater pipe is approximately 20 hectares in area. The proposed development site is located within the lower portion of this catchment, immediately upstream of the pipe's discharge point to an existing waterway approximately 150 m south of the development.

In accordance with Brisbane City Council's *Infrastructure Design Planning Scheme Policy*, Section 7.5.2, stormwater detention is **not required for developments located within the bottom one-third of a catchment**, as detention in these areas provides negligible benefit to downstream flood mitigation and can adversely impact upstream hydraulic performance. Based on the catchment delineation and the site's position, this policy is directly applicable to the proposed development at 409 Priestdale Road.

Furthermore, the existing 1050mm pipe is a major drainage asset designed to convey flows from the entire upstream catchment to the receiving waterway. The proposed development will discharge minor flows into this pipe, consistent with its intended function and capacity. Introducing detention at this location would not materially reduce downstream flood risk, as the dominant flow contribution originates from the upstream 20 ha catchment, not from the subject site.

We also reference the adjoining development approval (BCC Ref: A005513937), where Council has previously accepted direct discharge of minor stormwater flows to the same 1050mm pipe without detention requirements. This establishes a clear precedent and reinforces the application of Section 7.5.2 for developments situated at the lower end of a large catchment.

On this basis, the proposed development complies with PO2/AO2.1 of the Stormwater Code, as detention at this location is neither required by policy nor hydraulically beneficial. The existing 1050 mm pipe and downstream waterway provide adequate conveyance for the combined flows from the upstream catchment and the proposed development.

- b) We make specific reference to **Brisbane City Council's Infrastructure Design Planning Scheme Policy, Section 7.2.2.1**, which states that **pipng of major flows cannot be relied upon for managing major flows**, and that **minor flows are conveyed by underground drainage only**. In line with this requirement:

Under this Stormwater Code and QUDM principles:

- **Minor storm events** (up to the design minor ARI) are conveyed through the underground drainage system.
- **Major storm events** are managed via overland flow paths, typically contained within the road reserve or designated flow corridors, ensuring no adverse impact on adjoining properties.

Our SBSWMP demonstrates that all major flows will remain within the lawful road reserve corridor, and no new flow paths will be created. This approach aligns with PO2/AO2.1 of the Stormwater Code, which requires that major flows be safely conveyed without increasing flood risk to external properties.

- c) We acknowledge that the stormwater quality modelling results within the approved SBSWMP do not fully achieve the percent reduction targets outlined in **Brisbane City Council standards** and the **State Planning Policy (SPP) 2017** when assessed against conventional bio-retention basins. This outcome was achieved using **WSUD street tree pods**, which were adopted following BCC's own direction and consistent with Council's endorsed WSUD practices.

It is important to note that **Brisbane City Council's Infrastructure Design Planning Scheme Policy** and **Stormwater Code PO6** require developments to implement stormwater quality measures that are **practical, effective, and aligned with best practice Water Sensitive Urban Design (WSUD)**. The use of street tree pods satisfies these principles by:

- Providing distributed treatment close to pollutant sources.
- Reducing Council's long-term maintenance burden compared to large bio-retention basins, which require significant ongoing asset management.
- Supporting urban greening objectives and integrated streetscape outcomes.

Further, **precedent has been established** through numerous BCC-approved developments of similar scale within the surrounding area (eg. BCC Ref A006082281 and A005513937), where WSUD street tree pods have been accepted as the primary stormwater quality treatment measure. These approvals demonstrate Council's recognition that tree pods are a valid and practical solution for meeting water quality objectives under PO6, particularly where site constraints make large bio-retention basins impractical.

Implementing a bio-retention basin within this development would:

- Require significant land allocation, reducing usable development area.
- Impose unnecessary maintenance obligations on Council, contrary to the intent of sustainable asset management.
- Deliver negligible improvement in pollutant reduction compared to a distributed WSUD approach.

On this basis, the proposed stormwater quality strategy represents **Best Practice WSUD**, consistent with Council's own endorsed solutions and previous approvals. The SBSWMP therefore complies with PO6 of the Stormwater Code by:

- Incorporating WSUD street tree pods as an effective treatment measure.
- Achieving pollutant reductions to the greatest extent practicable within site constraints.
- Aligning with sustainable design principles and established Council precedent.

We trust that the above advice is satisfactory to the City to facilitate release of the Development Approval Decision Notice.

Should you require any additional information, please do not hesitate to contact us.

Kind regards,

Cameron Moore
Associate Director - Civil
ADG ENGINEERS (AUST) PTY LTD