

9 August 2021

Strategic Planning
City Planning and Economic Development
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Attn: Strategic Planning Team

Dear Strategic Planning Team

RE: Proposed citywide amendment - planning scheme policy - Amendment package N

We write in reference to the Brisbane City Council (BCC) '*Proposed Citywide Amendment - Planning Scheme Policy - Amendment Package N*' advertised on Council's website. Stormwater Queensland (SQ) notes with some concern that the amendment proposes to adopt Version 1.3 of the Stormwater Quality Improvement Device Evaluation Protocol (SQIDEP).

Whilst we acknowledge that Stormwater Australia is progressing both the governance and technical issues with SQIDEP, we believe that the adoption of SQIDEP Version 1.3 by BCC is premature and comes with numerous risks. Additionally, the message that this action sends to the industry is that SQIDEP Version 1.3 is a document that can be relied upon to provide a rigorous understanding of how stormwater quality improvement devices perform and therefore, the degree to which it can protect Brisbane's waterways and Moreton Bay. Given the current technical limitations with the document and its governance framework, SQ does not support this position and encourages BCC to reconsider the adoption of SQIDEP Version 1.3 into its planning scheme.

To date, only two products have achieved certification status under SQIDEP. Council currently has 14 approved devices. Reducing this to only two will greatly limit the selection of an 'appropriate' stormwater treatment device and may result in a device being used in an incorrect location, as there are limited certified options. We also note that SQIDEP Version 1.3 can be applied to green stormwater infrastructure, such as wetlands and bioretention systems. If SQIDEP is accepted in its current format therefore, this could prevent the use of such green infrastructure which are unlikely to be certified under SQIDEP in the near future.

SQ has prepared a detailed [submission](#) to Stormwater Australia which we request BCC considers as part of our submission to BCC (refer to Appendix A). Stormwater Australia recently responded to some of the governance matters addressed in SQ's submission however, SQ believes that several matters addressed in this response remain unresolved. This is detailed in our [response letter](#) (refer to Appendix B) which we also request BCC consider as part of our submission. The technical matters addressed in our original submission remain outstanding and at this point, there is no assurance that those matters will be suitably addressed (in a revised version of SQIDEP) in time for the BCC planning scheme amendment. Equally, even if the next version of SQIDEP was released in time, there would not be any time for industry assessment of whether the technical issues had been suitably addressed. We encourage BCC not to commit to a document with so much uncertainty.

We understand that there have been some concerns in the industry regarding both Stormwater Australia's and SQ's management of conflicts of interest. We would like to draw your attention in the two attachments which highlight the lengths that SQ has gone to in order to address its own conflicts of interest.

We would welcome further discussion with your officers about perceived conflicts of interest, how they have been managed by SQ or any other matters raised in our submissions.

Should you have any comments or questions, please contact SQ via secretary@stormwaterqueensland.asn.au

Kind regards



David Simpson

Secretary, Stormwater Queensland
On behalf of the Stormwater Queensland Committee