

**AFFIDAVIT**

**Planning and Environment Court**

**David Manteit V Brisbane City Council 2916/24**

I, David Manteit of 128 Ashridge Rd Darra, developer, under affirmation says:

1. I emailed a copy of the attached letter of 220 pages, numbered 1-220, to Adrian Schinnerer and Dr Kerrie Freeman on 20-10-25 as per "Attachment A".

Signed:



Deponent:

DAVID MANTEIT

Affirmed by David Manteit on



Taken by:

  
Justice of the Peace

In the presence of

Signed:



Deponent:

DAVID MANTEIT

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AFFIDAVIT

David Manteit  
128 Ashridge Rd Darra 4076  
Ph 0424739923  
Email [davidmanteit@hotmail.com](mailto:davidmanteit@hotmail.com)

**David Manteit V Brisbane City Council 2916/24**

"Attachment A".

Letter to Kerrie Freeman and Adrian Schrunner, 220 pages, numbered 1-200, sent on 20-10-25

David Manteit  
128 Ashridge Rd  
Darra 4076  
davidmanteit@hotmail.com

20-10-25

Dr Kerry Freeman  
The Chief Executive Officer  
Lord Mayor Adrian Schrinner  
Brisbane City Council  
266 George St  
Brisbane 4000.

cc. Crime and Corruption Commission

Dear Dr Freeman/Lord Mayor Schrinner

128 Ashridge Rd Darra A006565555 - 2916/24

**This case is a matter of public interest - Judge Williamson KC**

JUDGE WILLIAMSON

**24-4-25**

Given this is public interest litigation, public interest litigation, my inclination is to let the material in and we deal with it. And what I mean by that is...

- 1) Request for **written advice** by Brisbane City Council prior to instructing RPEQ engineers to prepare civil and hydraulic plans for Council approval, as per Condition 17 and Condition 7. Response from you required by 31/10/25.
- 2) This report provides further **clarification of matters** of interest and responses regarding your alleged corrupted and licenced and unlicenced Council employees ("The Council employees") corruption, that have come to light, up to 5/8/25, being the last court date. The findings in this letter and your responses will be referred to the Crime and Corruption Commission. Transcripts of all hearings are now in my possession.
- 3) **Statement to Lord Mayor Adrian Schrinner** ("Schrinner") and CEO Dr Kerry Freeman ("Freeman") or "You"

David Manteit states that it is not possible to provide "Upstream Drainage" as required under Condition 17, to the rear lots 97, 99, 99 without the breaking of certain laws, being the list of laws broken, in Table 1, that your or your unlicenced

employees or witnesses have already broken.

a) The alleged laws broken in Table 1 are a summary of laws allegedly broken -

- Laws allegedly already broken by your own accused corrupt licenced and unlicenced Council employees
- Laws already allegedly broken by your shonky winemaster witness Corrigan
- Breaking of laws forced on the owner, his civil and hydraulic RPEQ engineer and licenced plumber
- Trespass
- Alleged contempt of court by Susan Hedge, Sara McCabe, Adrian Schrinner and Dr Kerry Freeman

New separate allegations of corruption by Schrinner and Freeman will be made to the Crime and Corruption.

b) The hydraulic and civil design drawings required by the current Condition 17 cannot even be commenced to be prepared by the applicant's RPEQ engineer for approval, without the **breaking of Council, gravity and criminal laws** and losing of the RPEQ licence by the applicant RPEQ himself.

c) The laws broken by our RPEQ, if designed by him, in order to comply with condition 17, would be-

- Loss of applicant RPEQ licence for any illegal civil and hydraulic design prepared by him and criminal charges against him resulting from the Board of Professional Engineers from legal actions taken in the Magistrates Court by you.
- Stormwater Code
- Brisbane Planning Scheme Policies
- Brisbane Standard Drawings
- Newtons's law of gravity
- S163 and S164 of the Planning Act 2016



- Schedule 2 of the Professional Engineers Act 2002

**1) There is no RPEQ in Australia that could intentionally design something that breaks laws and therefore provide illegal design plans to comply with the current Condition 17. They will lose their licence.**

**Nothing has changed. Our RPEQ would have lost his licence and be jailed if he designed to the DA approved Upstream Drainage and Onsite Drainage red lines.**

And the consequences of the change made it more difficult for easements, and the like. That would be a reason why a solution, even though it worked, would not be generally in accordance with the indicative line shown on the plan.

a) Council would have been entitled to produce a S167 enforcement notice like you always do, for any building work that contravenes the previous DA approval, whether dry or flooded. You were warned of this in numerous filed affidavits.

b) Even draft hydraulic design made by our RPEQ Civil Works in the plans lodged for Onsite Drainage, filed on 31-3-25 are at risk of those consequences of S164. The preparation of hydraulic plans is carrying out building work. If that building work contravenes the DA approval, then the RPEQ loses his licence and attracts a fine of \$751,000 under S164 of the Planning Act 2016.

And the consequences of the change made it more difficult for easements, and the like. That would be a reason why a solution, even though it worked, would not be generally in accordance with the indicative line shown on the plan.

You forced our RPEQ and plumber to potentially lose their licences, for 7 months. Why did you do that? Please advise the Crime and Corruption, the Master Builders and all builders. I will be doing so.

c) The RPEQ design building work, for onsite drainage whilst only for discussion, complied with Brisbane City Council laws, but unlawful as it contravenes the DA approved plan and therefore may attract a charge of

4,500 penalty units being caught under S164 of the Planning Act 2016. The building work would never be approved by Council, since it contravened the DA approval.

**164 Compliance with development approval**

A person must not contravene a development approval.

Maximum penalty—4,500 penalty units.

And the consequences of the change made it more difficult for easements, and the like. That would be a reason why a solution, even though it worked, would not be generally in accordance with the indicative line shown on the plan.

e) The same principle applied to your own Upstream Drainage and Onsite Drainage red line lines approved on 25-9-25, that were removed on the day of the trial, 28 April 2025.

PLANNING ACT 2016 - SECT 163

Carrying out assessable development without permit

163 Carrying out assessable development without permit

(1) A person must not carry out assessable development, unless all necessary development permits are in effect for the development.

Penalty—

Maximum penalty—

(a) if the assessable development is on a Queensland heritage place or local heritage place—17,000 penalty units; or

(b) otherwise—4,500 penalty units.

The red lines and conditions in the DA approval were proven to be illegal and flooded. You said on 31-1-25 they were "one way". They were in fact not "one way".

The plans were flooded in depth and velocity at the kerb. You refused to take action on this allegedly corrupt employee conduct.

This is allegedly corrupt conduct on that basis alone.

f) Any contravention of the DA approved drawings potentially made by our RPEQ in design or construction by our plumber of both those flooded Upstream Drainage and Onsite plans would have attracted fines of 4,500 demerit points and a fine of \$751,000 under S164 of the Planning Act 2016.

And the consequences of the change made it more difficult for easements, and the like. That would be a reason why a solution, even though it worked, would not be generally in accordance with the indicative line shown on the plan.

**Judge Williamson KC** - "a solution, even though it worked, would not be generally in accordance with the indicative line shown on that plan" 30-4-25

These comments crystalize the fact that I could not make any changes to the red lines whatsoever, lawful or not.

You never offered to remove the red lines until 28-4-25.

As Judge Williamson KC states -



***" That would be the reason why a solution, even though it worked, would not be generally not in accordance with the indicative line shown on the plan"***

**Judge Williamson KC 30-4-25**

**There was no way Manteit could have lodged any change without starting another full Planning court application.**

**All thanks to Freeman and Schrinner.**

**Your damages can be summed up in one paragraph.**

**Judge Williamson KC 30-4-25 JW comments about the Upstream red lines**

And then during the appeal, the council has taken a step back from that and said rather than, us tell you what the solution looks like, here is a condition that allows you to demonstrate whatever option you like achieves compliance with the planning scheme in circumstances where we will say to the court that you can be satisfied there is a solution, it's just a matter of detail.

**Susan Hedge**

That is true but could I add this that the council's position is that the removal of the red line really had no effect because what was required by the condition was to be generally in accordance with the plan which had the red line on and then the red lines indicated to be indicative so our position is that many many stormwater options including pipes going straight through the middle of the lot rather than around the edge would have been generally in accordance with because of the purpose of the condition and the line, taking them together, is to provide upslope drainage connections.

So where the pipe runs isn't really the point.

The point is to provide the upslope connections if they're provided with a pipe that runs in a different line.

And so rather than having that dispute in this trial, we've removed the red line, because the red line has become a matter of fixation and distraction. So, but it's not accepted by the Council that the red line was inappropriately put on the plan or any of those aspects.

**Judge Williamson KC**

Sorry, I'm not suggesting it, but I have to say, I'm not sure it's as fluid.

It has fluidity, but I'm not sure the red line, by calling it indicative and generally in accordance, in effect opened the door to a whole array of solutions.

And the reason I say that is because generally in accordance with would be assessed by reference to the consequences of the change.

And the consequences of the change made it more difficult for easements, and the like. That would be a reason why a solution, even though it worked, would not be generally in accordance with the indicative line shown on the plan.

I don't think it's as easy as saying, look, this is one way, but if you don't do that, there's many other ways.

Because as soon as a line is drawn on a plan and generally in accordance with, unless there's something in the condition that makes it very clear, and I don't think indicative in and of itself gives much more than generally in accordance with.

There's some flexibility, but it's not open slather.

**Susan Hedge**

I accept that.

This statement is all one needs to explain the cause of my damages for at least for 9 months including holding costs and lost profits.





## **"Failure to comply with the conditions of a DA ....draws a a maxium offence of 4,500 penalty units = more than \$600,000 (2001)**

A DA attaches to the premises and binds the owner, the owner's successors in title and any occupier of the premises. It remains in effect even if there is a later development approved for the lot or the premises are reconfigured.

Failure to comply with the conditions of a DA is classed as a 'development offence' under the Act and draws a maximum penalty of 4,500 penalty units (with the value of one penalty unit for most offences under state legislation being \$133.45 as at 1 July 2020), or more than \$600,000.

The enforcement authority, such as the local council, must provide a 'show cause' notice under section 167 of the Act. This notice is issued if the enforcement authority reasonably believes a person has committed, or is committing, a development offence; and is considering giving an enforcement notice for the offence to the person.

### **Enforcement notices**

If the enforcement authority believes a person has committed, or is committing, a development offence such as not complying with the conditions of the DA, it may serve an enforcement notice to the person or, if the offence involves premises and the person is not the owner of the premises, the owner of the premises.

The enforcement notice will require a person to refrain from committing a development offence and/or remedy the effect of a development offence in a stated way and within a specific time frame.

The notice may require, for example, the development be stopped, demolished or removed; the premises be restored, as far as practicable, to the condition it was in immediately before development was started; and to do, or not to do, another act to ensure development complies with a development permit.

A person or owner may also be asked to repair, rectify or secure the works if they are considered dangerous; stop a stated use of premises; ask the person or owner to apply for a development permit, and; provide the enforcement authority with a compliance program that show how the enforcement notice will be complied with.

Among other requirements as to the time frame in which the notice must be complied with, it should also inform the person or owner of their right to appeal against the giving of the notice. Contravening an enforcement notice carries a maximum penalty of 4,500 penalty units.

## 2) Generally in Accordance.

A change to your illegal flooded red lines and conditions for Upstream and Onsite Drainage in the approval date 25/9/25 to make them lawful **would not be "generally in accordance"**.

**Your own advices to Brisbane residents, online on your own website -**

Brisbane City Plan 2014  
Interpretation guidance 01/2021

### What is Generally In Accordance (GIA)?

Generally In Accordance (GIA) advice is a non-binding expression of an opinion from an appropriately qualified person that an inconsequential alteration or amendment to a development is considered to be in accordance with the requirements of an approval. GIA is not recognised by planning legislation and does not replace any aspect of the approval.

This Interpretation guidance is intended to assist in clarifying if an alteration to the development might be GIA or would require a change request application under the planning legislation; and where necessary, how to seek Council's written advice on GIA.

#### Background

Development that is approved by Council requires that development to be constructed 'In Accordance' with the approved plans, documents, and conditions. In many circumstances following an approval, alterations to the development may occur as the result of detailed design, improved construction methods or site-specific circumstances.

Section 77 of the *Planning Act 2016* (the Act) recognises changes to a development and provides pathways to amend the approval (refer to the Act for information related to 'minor change' or 'other changes'). However, small variations from the approved plans may not require a change application. In these situations, a GIA opinion from an appropriately qualified individual/organisation may be sufficient to demonstrate a development is in accordance with the approval.

#### What is not a GIA?

Any alteration that requires a Development Condition to be changed.

Any alteration that requires specialist assessment such as an engineering traffic consultant.

An alteration that does not meet an Acceptable Outcome assessment benchmark and requires consideration against a Performance Outcome assessment benchmark where the Acceptable Outcome was met at the time of the approval or where the alteration exacerbates an approved Performance Outcome. E.g. Reducing an approved building setback from 2.4 m to 2.3m when the acceptable outcome was 3.0m.

Integral component of a Development being added or removed. E.g. Deep planting being removed.

A change that would trigger the re-calculation of Infrastructure Charges. E.g. Changing 2-bedroom units into 3-bedroom units within a multiple dwelling complex, even when the building footprint and GFA are not changed.

A change that alters the number of bedrooms in a multiple dwelling complex E.g. Making a 1-bedroom unit into a 2-bedroom unit [operational impacts].

Adding a balcony or enclosing a balcony to a multiple dwelling. The variation may affect the visual appearance of the building and generate overlooking/privacy concerns or reduce access to private open space.

Any amendments to parking layouts, including changing from single to tandem parking bays.

Significant changes to the visual appearance of the development. E.g. Changes to roof forms.



### 3) Manteit not able to make changes to the red lines whether dry or not

a) **Judge Williamson KC** has made comments on your red line hydraulic plans, and explained it sufficiently in Court on 30-4-25.

b) It is alleged that you were **very lucky not to get a determination** and referral to the department of prosecutions during the trial. You allegedly knew this and that is why you allegedly chose to remove the red lines on the day of the trial. What a coward.

You should seek legal advice now and find a barrister that doesn't lie in Court, like Susan Hedge, to advise you in this matter, for 7 months , including 24-4-25.

c) Why have you **hidden these flooded pipes from the public for 7 months?** Are Freeman and Schrinner are responsible for their employees and witnesses they rely on.

Your Council solicitor Sara McCabe is allegedly implicated as well. The CEO was warned about Sara McCabe, one year ago, by me, about her practices.

Feel free to phone South and Geldard for further advice on the 4,500 penalty units.

It seems like you are not getting good advice from City Legal.

d) The obligation to comply with the DA plans and conditions passes on to **all subsequent owners.**

This topic has been covered ad nauseum by myself in my lodged files

e) It will be a question you to advise myself and the Crime and Corruption Commission **if you have now stamped out this corrupt practice of Council staff drawing illegal DA approved red lines that "it won't work (Susan Hedge)"** and expecting that owners can contravene the DA approval, to fix up your alleged Council employee corruption. The Master Builders and all homeowners need to be aware.

f) I advise you now that if you persist with practice of encouraging owners to carry out building work contrary to the DA approval and conditions that it is my belief that you will allegedly be charged, as a criminal offence. You were warned in 2020 by the CCC.

#### 4) Warning to Master Builders and REIQ

- a) The REIQ will be informed since owners need to check their site for unlicensed Council employee pipes on their land. They will never sell their house, as declaration now needs to be made to buyers.
- b) I will seek orders that you inform the **Master Builders and REIQ** and affiliated organizations of your alleged illegal employee unlicensed engineering practices. .
- c) An owner of a house in Brisbane will not be able to sell their house, as a result of your placing illegal red lines on a property. New rules having come into place 1/8/25.
- d) You have destroyed the values of many homeowners if this practice under your employee has not been stamped out.

**Does the Lord Mayor wish to continue to cause the landowners of Brisbane to fail to sell their house?**

**Every time an owner that has an illegal Council employee red line placed on their property, they have a legal obligation to advise purchasers.**

**Hence their property value has plummeted.**

**When will the Lord Mayor stop house owners from being able to sell their property?**

I intend to inform every home owner in Brisbane to check for illegal Council employee red lines. They will not be able to sell their house.

#### 5) You have hidden the flooded pipes for 7 months

- a) **You were warned about these alleged corrupt practices** ad nauseum. It is alleged that you have continued to encourage Council employee corruption and that you knew pipes were flooded
- b) **Why have you attempted to hide the evidence** of the alleged corruption of your Council employees, for 7 months? Then you allegedly attempted to hide your employee corruption from 6/5/25 to 5/8/25, from your failed legal case.



c) Take note of your bumbling barrister, Susan Hedge words. She thinks the pipes can go anywhere.

<b>SUSAN HEDGE</b>	<b>24-4-25 Hedge "It won't work"</b>
Mr. Corrigan... So, the Civil Works Engineers report says that where the red line is, the indicative line on the plan, <u>that that won't work.</u>	<b>Hedge - "that won't work"</b>
<b>JUDGE WILLIAMSON</b>	
Okay. Well there we go.	<b>Judge Williamson KC - "Well there we go "</b>
<b>SUSAN HEDGE</b>	
That's Civil Works Engineers. <u>That's the letter. Yes.</u>	
Mr. Corrigan agrees that where that red line is, like if you take a literal interpretation of what is in fact an indicative drawing, <u>then that will not work.</u>	<b>"then that won't work"</b>
<u>He's identified two other ways that you can achieve the outcome of the condition,</u> which is to provide upslope drainage.	<b>Hedge - "He's identified two other ways that you can achieve the ....condition."</b>
<b>JUDGE WILLIAMSON</b>	
Yep.	

b) You have allegedly forced a judge and myself to stare at and assess flooded red Upstream Drainage and Onsite Drainage hydraulic plans prepared by your allegedly corrupted unlicensed Council employees for 7 months, even on 24-4-25, and then turn up in Court with no red lines.

You have wasted court resources for seven months, by your own admission. You have caused me damages by holding costs and lost profits.

## 6) The Susan Hedge timing of RPEQ plans con

**a) When was Schrinner and Freeman involved? They are responsible for the actions of their bumbling barristers**

b) On 24-4-25 at the pretrial hearing, Susan Hedge answered a question from Judge Williamson KC about timing of when RPEQ plans are required to be submitted.

c) Hedge correctly advised Judge Williamson KC on 24-4 -25 that the RPEQ plans were only required to be submitted, 'as constructed", after construction of the pipes.

(d) You and Hedge filed a totally different condition, requiring the RPEQ to provide plans before construction of the pipes, as little as one hour later.

e) **Susan Hedge had basically conned Judge Williamson KC on 24-4-25 into thinking that Condition 17 and 18 would be staying the same for the trial.**

f) **Susan Hedge has misled a judge**, on the basis of that a different position was already instructed by Schrinner and Freeman to Susan Hedge prior to 24-4-25. The different position for trial was filed as little as one hour later (CCTV requested).

g) **Hedge then instructed witnesses Corrigan and Ryan to change their witness statements in order to cover up your mess.**

(h) You knew that there was no way for the appellant to submit any new RPEQ plans, whether wet or dry, without a court application.

**SUSAN HEDGE**

17, which is the on-site drainage which also just requires the submission of the as-constructed drawings.

Why has Freeman and Schrinner refused to change this condition for 7 months, but change it on the day of the trial, in order to disguise you alleged corruption. This is alleged contempt of court.

## 24-4-25 Susan Hedge - submission of as-constructed plans (both 17 and 18 prior to plan sealing")

SUSAN HEDGE

Yes. So Condition 18, which is the upstream connection condition, which seems to be the one most in debate, the main condition is to provide a stormwater drainage connection for certain upstream lots.

And then the sub-conditions are: I'm just giving you the short version, prepare stormwater drawings, which have to be certified by an RPEQ. Then implement (construct) those certified stormwater drawings is 18B. And then 18C is submit as constructed drawings to the council. And the timing of that, I'm sorry.

JUDGE WILLIAMSON

That's not the condition I have in mind. There's another condition which talks about, I thought, a submission of an engineering plan, but that's...

SUSAN HEDGE

17, which is the on-site drainage which also just requires the submission of the as-constructed drawings.

And could I just indicate the timing of the submission is prior to Council's notation on the plan of subdivision?

JUDGE WILLIAMSON

Yeah, prior to sealing, yeah.

SUSAN HEDGE

And then the other... Yeah, so condition 12 might be what Your Honour was thinking about. It's about filling and excavation. Yep. And 12A is submit earthworks drawings prepared by an RPEQ.



## 7) Raising pad level fantasy by your goldfish Corrigan and dumbo barrister Hedge.

- a) The laws that **nobody can break is Newton's law of gravity**. In this case the gravity needs to be minimum .5% and 1% respectively. All Corrigan's plans and "solutions" end up under the Ashridge Rd Kerb.
- b) It **doesn't matter if you raise any building pad**, since you can't change the rear lot surface level, pit depth and kerb invert level. Why do you employ simpleton barristers and goldfish witnesses?
- c) I have done further analysis on lot 97, for transparency purpose only, and confirm my original advices.
- d) due to -

**Gravity** - the pipe would not drain through the development - gravity - I cannot physically build it. It ends up .9 m below **It is impossible to provide rear lot connection to lot 97** the kerb.

That makes around **8 flooded Council plans so far, that you have instructed.**

This is alleged contempt of court to continually wasting ratepayer's money.

In addition, the flow at kerb is around 70 L/s, which contravenes S7.6.3.1(2).

**Council employees - 4 flooded plans.**  
**Corrigan 4 flooded plans.**

If you have any more flooded plans, please advise myself and the Crime and Corruption Commission

Why has Schrinner and Freeman paid your rates money for 8 flooded plans?

**Kerb velocity over 70 L/s for Lot 97.**

You dumbo barrister Susan Hedge and goldfish Corrigan knew the pipe would be flooded and tried to fool Judge Williamson KC.

## Illegal easements

- a) I object to any easement going across my yard, since it **blocks all construction** and services.



b) The placing of easements in my front means that there is **impossible to obtain plan sealing**.

c) The **withholding of the easement document was a major impediment** to my appeal. It is alleged that you gave the instructions to withhold the easement document. Judge Williamson KC forced you to provide this document to me one day after the appeal ended.

d) The easements **eliminate** any chance for a third block of land in the future.

e) **The fact that you have instructed your corrupted Council employees to refuse a request of Manteit for a copy of the easement document around 100 times is considered to be corrupt conduct by the Council employees.**

**The withholding of the easement document is alleged corrupt conduct by you as well.**

f) A **likely request for retrial** will be forthcoming due to your alleged contempt of court and alleged instructions to thwart my case. The upcoming contempt of court case will preceed the retrial case.

## 8) Current condition 17

<p><b>17(a) Prepare Stormwater Drawings</b></p> <p>Prepare stormwater drawings and engineering calculations, certified by a Registered Professional Engineer Queensland in accordance with the relevant <u>Brisbane Planning Scheme Codes</u>, and submit to Council for approval.</p> <p>Note:</p> <ul style="list-style-type: none"> <li>- Queensland Building and Construction Commission licensed hydraulic consultants may design the stormwater system for sites less than 2000m2 with an upstream catchment servicing no more than 4 residential lots.</li> <li>- Guidance for the preparation of drawings and/or documents to comply with this condition is provided in the <u>Brisbane Planning Scheme Policies</u></li> <li>- A 225mm diameter pipe is the minimum size required to service an upstream development of any kind.</li> </ul> <p>Timing: Prior to site/operational work commencing.</p>	<p>As indicated</p>
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**Above - court order condition 17.**

## 9) Response to the Crime and Corruption Commission

I request that you provide a letter addressed to the Crime and Corruption Commission stating that **you have read all the court files.**

To clarify, I request that you **respond to all previous Crime and Corruption allegations** that pertain to the actions of your accused corrupt licenced and unlicenced Council employees.

I also request that you respond to new Crime and Corruption allegations provided in this letter.

There will be a **fresh complaint of alleged corruption** made to the Crime and Corruption Commission regarding allegations of your **attempts to thwart David Manteit's case.**

Schrinner and Freeman are alleged to have **given instructions to thwart the case**, be in contempt of lodging files and instructing lies by barrister in Court for 7 months including 24-4-25 and 28-4-25.

The second category of alleged Corruption of the Lord Mayor and Dr Freeman, whilst normally would be regarded as independent, stem from the continual alleged attempt to hide the possible prison sentences to the Council employees and intent to keep your jobs.

You are alleged to be responsible for actions commenced by you and your lying barrister and also your assisting solicitor, who has been allegedly proven to prepare false documents to this Court. Who else gave instructions to allegedly lie in Court for 7 months?

## **10) Table of laws already broken**

A summary of past laws allegedly broken by unlicenced Council employees and Corrigan have been stated in Table 1 of this report.

**Some laws are mentioned every day by your own excellent employees, such as Planning Scheme Policies to be achieved, requested by your normal Council assessment officers.**

**I have given examples of this excellent conduct, filed in Court, including my Crime and Corruption Commission audit, 259 pages filed around 25/1/25 and should be used as the standard to shine a light to.**

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# 11) Your "normal" council employees, like Christensen, in relation to Upstream Drainage, ask DA applicants to comply with PO11, Brisbane Planning Scheme Codes, Planning Scheme Policies.

Your goldfish in Court, Corrigan, does not comply with any Brisbane Planning Scheme Codes, Planning Scheme policies, QUDM manual, whatsoever. In addition he intentionally uses fake formulas. You should be very ashamed.

Your witness Ryan stated he has not examined the rear lots whatsoever and states that he has no knowledge of S7.5.3 (rainwater tanks) because that's "town planning" Where did you find these witnesses?

It is alleged that you and Susan Hedge had instructed both Corrigan and Ryan to not discuss Brisbane Planning Scheme Policies **as part of a strategy**, since your accused corrupted unlicensed Council employees have broken every Planning Scheme policy in the book.

Then you pay Corrigan with ratepayers money to insert illegal flooded plans, 150 intentional errors and illegal rainwater tanks.

Why did you spend ratepayers money on a shonky witness that does not act like your normal assessment managers and refuses to comply with Council laws?

**Brisbane City Council** [www.brisbane.qld.gov.au](http://www.brisbane.qld.gov.au)

**City Planning & Sustainability Development Services**  
Brisbane Square, 255 George Street, Brisbane QLD 4000  
GPO Box 1438 Brisbane QLD 4001  
T: 07 7420 3388  
[cityplanning@brisbane.qld.gov.au](mailto:cityplanning@brisbane.qld.gov.au)

*Dedicated to a better Brisbane*

29 July 2024

Mr Jason Gao  
C/- Ultimate Planning Solutions  
4/113 Scarborough Street  
SCARBOROUGH QLD 4020

**ATTENTION: Marvin Wright**

**Application Reference:** A006548093  
**Address of Site:** 22 PARNASSUS ST ROBERTSON QLD 4106

Dear Marvin

**RE: Information request under the Planning Act 2016**

Council has carried out an initial review of the above application and has identified that further information is required to fully assess the proposal.

**1) Stormwater Upstream Connection**

Specialist assessment has found that PO11 of the Stormwater code is not addressed in the Code assessment report. To ensure compliance against the code

a) Provide engineering drawings demonstrating upstream connection complying with performance outcome PO11 of the Stormwater code. The proposal must comply with Brisbane Planning Scheme codes, planning scheme policies and must be certified by a registered professional engineer of Queensland.

**2) Erosion Hazard Assessment**

An Erosion Hazard Assessment (EHA) form has not been completed contrary to 7.11.2.1 of the ID PSP.

a) Complete and submit an EHA form (available on Council's website) by a suitably qualified consultant.

**3) Existing Structures**

It is unclear if the existing structures including the dwelling house, garage, pavers and pool are to be retained after subdivision.

a) Submit amended plans relating removal of the dwelling house, garage, pavers and pool.

**Responding to this request**


Your response should include a summary table which outlines any changes to performance outcomes and plans that have resulted from addressing the issues outlined above. The table should also include details of any supporting documentation.

If a response is not provided within the prescribed response period of three (3) months assessment of the application will continue from the day after the day on which the response period would have otherwise ended.

Email your response to [CityPlanningSupport@brisbane.qld.gov.au](mailto:CityPlanningSupport@brisbane.qld.gov.au) quoting the application reference number A006548093.

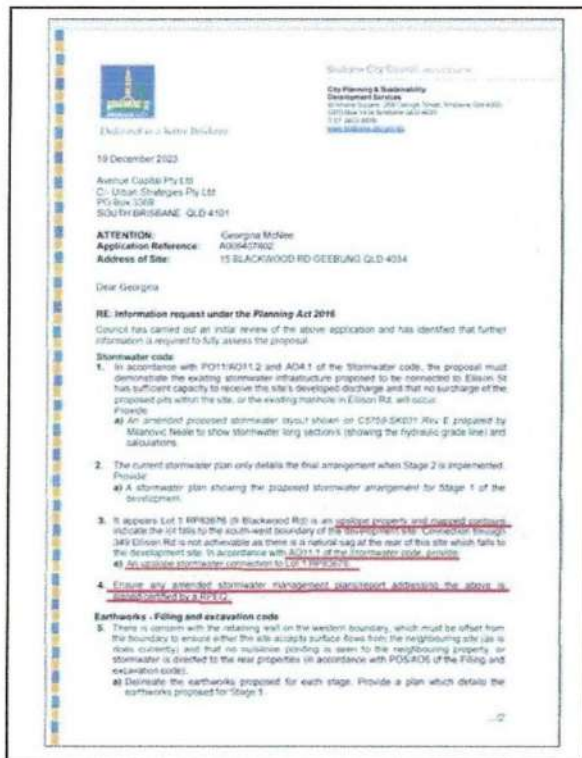
Please phone me on telephone number below during normal business hours if you have any queries regarding this matter.

Yours sincerely



Erik Christensen  
Urban Planner  
Planning Services North  
Phone: (07) 31782320  
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Development Services  
Brisbane City Council

**Erik Christenson - "The proposal must comply with the Brisbane Planning Scheme Codes, Brisbane Planning Scheme Policies and must be certified by a registered professional engineer of Queensland."**



**"Normal assessment manager process".**

**Filed in court for Mr Christensen and Ms Bernard.**

## 12) Your refusal to accept offer on 29-4-25 by Manteit to Council to breaking laws PSP S7.5.3(6) and PSP S 6.3.3.1 in the conditions

An offer was presented by David Manteit to Council via Judge Williamson KC on 29/4/25 in Court, that David Manteit for agreement that these following conditions should be placed in the final approval -

Contravening of Brisbane Planning Scheme policy PSP S7.6.5.3, which would allow the installation of illegal rainwater tanks by rear lot neighbours.

- Flow velocity at kerb is to be allowed is greater than the legal 30 l/s at the kerb for the entire catchment plus existing against PSP S7.6.3.1 (1) and (2).
- These proposed conditions would also have accepted Manteit breaking of Council laws BSD 8111, BSD 8113.

38) Susan Hedge barrister screamed and yelled in Court (transcript) by attempting to force Judge Williamson KC to believe the alleged fraudulent Corrigan report, despite Corrigan's intentional promoting the breaking of numerous Council laws and the laws of gravity.

Refer transcript.



Susan Hedge advised Judge Williamson KC that Council would not allow those conditions above to be placed in the final approval, due to being unlawful.

It has already been stated by Council in Court on 29/4/25 by Susan Hedge barrister, that certain conditions put forward by Manteit, below, for inclusion in the Court conditions of the allowance of contraventions of 6 Council laws. They were refused by you.

7.6.3 (2) are not acceptable as conditions in a future Council approval.

**David Manteit V Brisbane City Council 2916/24 Proposal to Court 29-4-25**

**Condition 18.**

Council allows the abovementioned stormwater drainage and calculations **may include -**

1. Contravention of S7.5.3 (6) by allowing above ground onsite detention tanks, on a freehold lot, for up to a 10 lot rear plan of subdivided lots without a body corporate, (or alternatively 4).
2. Contravention of S 7.6.1 (1) and (6) by allowing above ground onsite detention tanks for up a 10 lot rear lot plan of subdivided lots without a body corporate (or alternatively 4).

**3. Contravention of -**

S7.6.3.3.1 (2) 30 l/s  
S7.6.3.1.1 (2) BSD 8113  
S7.6.2.1 (1) BSD 8111  
S7.2.3 (2) - BSD 8111

**Conditions offered by David Manteit in Court 29-4-25 not accepted.**

**Susan Hedge**

**29-4-25**

And about the substandard matter? Yep. On that first matter, I'd need to take some instructions.

Because it might be that the remedy for opposing, just gaming it out, with your honour.

If we were to oppose the change in position, the remedy is to recall witnesses, or costs, or an adjournment, perhaps, and none of that's very attractive, we're on the last day of the trial, so if Your Honour's willing to give me five or ten minutes to see some instructions about whether we oppose the change in position, it might be that we can just deal with it in submissions.

But as to the second issue, the substantive issue, the Council would oppose the inclusion of any of these things in Condition 18.

If, for example, the evidence was so... there'd been a full... I think was the word you used, assessment of this catchment on the upslope lots, and there was only one way of doing things, then that could be conditioned, but we're just not at that stage. And so my suggestion would be-

**Extract of Susan Hedge court advice re the Council refusal of conditions.**

**13) Not possible for water to drain through the development.**

It is not physically possible for any water from the rear lots 97,98,100 to drain through the development (128 Ashridge Rd development) as per PSP S7.6.5.

This relates to Newton's law of gravity and the legal minimum gradients stipulated by Council laws, .5% and 1%. In addition what cannot be changed is -

- Depth at the rear lot neighbour's boundary of pipe size plus cover. Eg, starting invert level (depth) =  $450+375 = 825$  depth.
- Kerb invert level.

See tables calculations.

The goldfish Corrigan and dumbo Susan Hedge mistakenly think that the middle of the block can be raised in order to fix up their flooded plans.

#### 14) Court transcripts

I am in the possession of both audio and written transcripts of every word of all hearings, before, during and after the trial, 28-30 April 2025. In addition I have transcripts of all subsequent hearings, up to 5/8/25, for use at my discretion for any proposed further court cases.

#### 15) Further corruption allegations imminent.

There will be further corruption allegations made against you and others, by me, as a result of those findings in the transcripts **and the conduct of certain individuals prior to the trial and in the trial.**

**There will be a contempt of court case filed, which is being prepared currently.**

#### 16) Consequences should Council refuse to supply list of Council laws that can be broken by the applicant.

- If there are no responses advices by you and Council by 3/11/25, I shall consider all actions possible.
- Should Council refuse to supply a list of Council laws that are consented to can be broken, in order to enable preparation of hydraulic plans to be in compliant with Condition 17, it will be assumed by Manteit that your accused corrupted unlicenced Council employees and Corrigan have broken all the laws as mentioned in table 1 and this report.

The material in this letter will and may be used in any -



- Current Crime and Corruption Commission investigation
- Any future Crime and Corruption Commission investigation
- Any Contempt of Court application
- Any fresh Planning Court application
- Any damages action claims against you and individual Council employees
- Referral to the Department of Prosecutions.
- Should you and Council not provide the responses by 3/11/25, as requested, I will take action in a Court to recover the application moneys of this letter immediately, without further notice, since you have provided guidelines for services upon payment of monies on your website, of which I have followed.
- Your response, actions and any correspondence including this letter will be made public, to any journalist, or on [brisbanecitycouncilcomplaints.com.au](http://brisbanecitycouncilcomplaints.com.au). This letter and report is not confidential.
- Take it that you have been warned of all of the above mentionings and actions by me shall take place without further notice.

## 17) Damages claim

a) Either way, there will be a separate **damages claim** in the future. The outcome of your response to this letter, will determine the quantum of those damages. You and Council has the chance to limit those damages now.

b) You **changed the assessment process, of when RPEQ plans are approved.**

This action by you, in effect proves beyond doubt the previous inability of myself to make changes to the red lines and a damages claim.

This is also evidence of your corruption since you could have offered to change the approved red lines, but you chose not to. You allegedly chose to protect yourself and the Council employees. That alleged tactic did not work. You are allegedly now in very deep.



- c) Then allegedly you and or your barrister **lie to a judge's face**, in Court, on 24-5-25, one day before the trial, on may counts. Did you instruct someone to lie?
- d) Your dumbo barrister Susan Hedge allegedly caused Judge Williamson KC to lie, (inadvertently)13 times, on 24-4-25, by her stating to Manteit that Council's position for the trial was as of Court document 23, dated 31-1-25.
- e) In addition, there is no doubt that the evidence suggests that Susan Hedge lied to Judge Williamson KC for 7 months and on 24-4-25 and advised him - **"he (Manteit) has everything in exactly the form that will be filed or relied on" (for the trial).**
- f) In addition, Susan Hedge stated to Judge Williamson KC on 24-4-25, stating that Council's position that there was **no method for Manteit to provide submission for Council approval of plans prior to construction of the pipes.**

**24-4-25 Susan Hedge - "17... also just requires the submission of the as-constructed drawings"**

**JUDGE WILLIAMSON**

That's not the condition I have in mind. There's another condition which talks about, I thought, a submission of an engineering plan, but that's...

**SUSAN HEDGE**

17, which is the on-site drainage which also just requires the submission of the as-constructed drawings.

And could I just indicate the timing of the submission is prior to Council's notation on the plan c subdivision?

**JUDGE WILLIAMSON**

Yeah, prior to sealing, yeah.

**Perhaps one hour later - Council<sup>if</sup> changed their position to requiring submitting of RPEQ plans prior to construction of pipes. Filed in Court.**

**24-4-25 Susan Hedge - "Council's position is that no other approval is required. Mr Ryan's dealt with that in his report"**

**SUSAN HEDGE**

Yes. Well, there is, if it assists. The current conditions as they are do not identify a required engineering solution. They are an indicative solution.

And then a RPEQ-designed solution is to be implemented.

Your Honour asked me at the last review about whether a further operational works approval or some other approval is required, and the Council's position is that no other approval is required.

Mr. Ryan's dealt with that in his report, so as to provide an expert opinion about that.

### Ryan

- (a) Condition 17(a) requires the submission of 'As Constructed' drawings (of the stormwater works required by condition 17) prepared and certified by an RPEQ or a Queensland Building and Construction Commission licensed hydraulic consultant, prior to Council's notation on the plan of subdivision.
- (b) Condition 18(a) requires stormwater drawings and engineering calculations, to be prepared and certified by an RPEQ in accordance with the relevant Brisbane Planning Scheme Codes, prior to works commencing.
- (c) Condition 18(c) requires 'As Constructed' drawings prepared and certified by a Registered Professional Engineer Queensland or a Queensland Building and Construction Commission licensed hydraulic consultant (where applicable) to be submitted to Council, prior to Council's notation on the plan of subdivision.

**Manteit's RPEQ has attempted to design the corrupted flooded Upstream drainage plan. He couldn't design it because it was illegal.**

**Ryan has picked up Schrinner and Freeman's problem. Schrinner and Freeman knew this was a problem for 7 months but they refused to tell Manteit until the day of the court trial, 28-4-25. Thanks for that.**

**My RPEQ couldn't change the red lines because even if the new plans was lawful with Brisbane Planning Scheme Policies, it would contravene S164 of the Planning act causing him \$751,000 fine and loss of his licence.**

Ryan acknowledges Council employee intentional error.

Council refused to advise Manteit for 7 months of their error until the day of the trial. Hence a retrial is necessary and damages paid.

g) Susan Hedge explained in Court it was a mistake. That's called a \$750,000 mistake. And corruption if you were not transparent to Manteit and Court, previously.

### Ryan lie about submission

- (e) In each of the examples above, would be confident that a solution (that meets the assessment benchmarks and planning purpose) is available subject to detailed design that follows the application. I note that in this case there is a reference on the approved drawing which indicate the mark ups are 'indicative only' and 'subject to detailed design'. There is also a note on the driveway which references the condition of approval. In my opinion and experience there is flexibility about the final design where Council seeks to Red Pen approved plans. The final design (including for the subject development and in the three examples I have provided above) would be determined as part of the subsequent submission to Council. In the case of the easement example noted above, the final location

**This idiot thinks that there will be a further submission to Council. Ryan knows that is unlawful.**

Reply Forward



Ryan thinks that there would be a further submission of plans.

The changing of any red lines is a major change including the **requirement that an RPEQ hydraulic engineer needs to make the changes.**

In addition, only a small change is traditionally accepted by Council, say by 50mm, but in the case of a flooded pipe by 1.2m, no small change is generally in accordance.

Council have never invited any lodgements of a change to the red lines for approval.

The only way for Manteit to lodge the plans is build a pipe 1.2m under Ashridge Rd, get a fine of \$751,000 and the RPEQ loses his licence.

**The corrupt unlicensed Council employees refused to supply invert levels.** This is because they have attempted to hide from the Crime and Corruption Commission.

Lucy Ting knew the pipes were flooded the day Manteit phoned her around 11/10/24 and asked her for levels. She hung up the phone in 30 seconds.

mistake and contempt of Court by up to 4 accused persons. More to come. Stand by.

Could I make an amendment though to our conditions which is on page 12. 28-4-25

Judge Williamson KC

Yes.

Susan Hedge 'the timing for 18A'

Your Honour, we'll see timing right at the top of the page and that's the timing for 18A.

Judge Williamson KC

Yes.

Susan Hedge Hedge - "that's just by error there"

And the part that's underlined, which reads, and after approval is obtained from council about stormwater drawings, that's just by error there. That inclusion should be in 18B, because 18A is about obtaining approval.

Judge Williamson KC

Ah right

Susan Hedge Hedge - "it doesn't make sense"

And so it doesn't make sense to obtain approval after you've obtained approval. So, in 18B, it should say timing prior to Council's notation on the plan of subdivision and after approval is obtained from Council about the stormwater drawings.

**i) Slippery Susan Hedge the bumbling barrister makes two different statements in two days. One before court and one on day one in Court.**

**Susan Hedge coralled her two witnesses in Court to Make them the scapegoats, as if it was the witnesses' idea.**

**Susan Hedge**

And is your view that that timing for 18b that is the implementation of the certified stormwater drawings that occur prior to council's notation on the plan of subdivision and after the approval of the drawings. Is that a reasonable response to the planning scheme provisions that are relevant?

**Corrigan**

Yes, I think it's a reasonable response. I think it adds, the addition adds some clarity to ensure that the approval is obtained prior to those works being carried out.

**24-4-25 "I don't think I can assist with that question. Its a matter of engineering design"**  
**Keiran Ryan**

I'm sorry, I don't think I can assist with that question because it's a matter of engineering design, which is outside my expertise.

**David Manteit**

Right, that's sort of, because there are other ones there, I don't want to bore you to tears, coefficient, you know, it's in the town plan. So, would you say that anything with a number from the town plan that you can't assist?

**"I can't assist. ..is a matter of engineering"**  
**Keiran Ryan**

No, I wouldn't say anything with a number I can't assist, but this section that you've taken me to is a matter of detailed engineering design that I can't assist with.

**Why has the Lord Mayor allegedly sunk to the lowest depths by using two shonky witnesses to control Council assessment process? And allegedly use them as scapegoats. How much were they paid ?**

**The dog at my homework.**

**18) Susan Hedge - Condition 18 - which seems to be the one there is the most concern**

a) Susan Hedge intentionally did not mention to Judge Williamson KC about Council's intention to remove Onsite Drainage red lines, condition 17, simply stating **"Condition 18 which seems to be the one there is the most concern"** This was



another lie by Hedge, in order to hide discussion of this condition 17 red line removal.

b) As little as one hour later, a different position by you was filed in court.

**Which person gave the instructions to file the affidavit in Court on 24-4-25 to change the Council's position after fooling Judge Williamson KC and myself ?**

Freeman or Schrinner?

In addition, you **did not notify Judge Williamson KC of the change in position until the opening day of the trial.**

**19) Hedge hides affidavit of table of conditions in Court.  
Investigations are under way.**

**Judge Williamson KC**

**28-4-25**

Well, and Mr... One, two, three, four, five. Okay, so, looking at paragraph one of the agreement four, court document number 23, I will... I'll mark court document 23, that'll be exhibit five. The affidavit of Mr. Corrigan, which is court document 44, that'll be exhibit six. The affidavit of Mr. Ryan will be Exhibit 7. That's number 45. And court documents 50 and 51, which are the CEA certificate of Freeman, I'll mark collectively Exhibit 8. the Table of Conditions...

**Susan Hedge**

Can I tender a copy of that? It's the same as was attached to the affidavit but the affidavit's not necessary.

**Judge Williamson KC**

Okay, Council's Table of Conditions will be Exhibit 9.

**Hedge - "the affidavit's' not necessary"**

**Susan Hedge**

I might give Your Honour a moment to read the opening submissions if that's appropriate. Mr Monty also hasn't had a chance to read them. I gave them to him a few minutes before we started, so he might all read

**Judge Williamson KC**

them. Mr Monty, I'm just about to read the Council's opening submissions.

It appears that Hedge has attempted to hide the affidavit re table of conditions.

The affidavit was filed on 24-4-25.

Judge Williamson KC asked Slippery Susan Hedge "Ms Hedge, has Council supplied all of its material to Mr Manteit ?"

Hedge "He has everything he needs" This is called contempt of court.

This affidavit was filed after Susan Hedge lied to Manteit stating previously on the

same day that "he has

An investigation is underway.

## 20) Table 1 - List of laws allegedly broken in the past by -

Unlicenced Council employees 7-10 persons

Licenced Council employees Blake and Ting

Council instructed witness Andrew Corrigan (that you relied on)

Forcing of Applicant's RPEQ and plumber to lose their licence and receive fines of \$751,000.

Trespass into rear neighbour's properties by construction of hydraulic pipes.

**Table 1 - list of laws broken**

<b>Acceptable Outcomes</b>	
<b>AO11</b>	<b>Numerous</b>
<b>Performance Outcomes</b>	
<b>PO2</b>	<b>Numerous</b>
<b>PO3</b>	<b>Numerous</b>
<b>P11</b>	<b>Numerous</b>
<b>Planning Scheme Policies</b>	
PSP S7.6.3.1 (1) 30 L/s	10+
PSP S7.6.3.1 (2) 30 Max L/s inc external catchment	10+
PSP S7.6.1 (1)	10+
PSP S7.6.1 (2)	10+
PSP S7.6.5	14+
S 7.6.2 (3)	4+
PSP S 7.3.3.1 - Fraction impervious	8+
PSP S7.5.3.6 - Rainwater tanks not allowed	8+
PSP S7.6.2 - 400mm from low side of kerb	8+
<b>Tables</b>	
Table 7.2.2.23A - Coefficient of discharge	4+
Table 4.5.1 QUDM	4+
Table 7.2.2.3 B - Level III	4+



<b>Brisbane Standard Drawings</b>	
BSD 8111	12+
BSD 8113	12+
BSD 8091 - stormwater pits	2+
BSD 8114 - kerb adaptor	4+
<b>Newtons law of gravity</b>	16+
<b>Laws punishable by possible imprisonment</b>	
S 115 (1) of the Professional Engineers Act 2002	24+
Schedule 2 of the Professional Engineers Act 2002	24+
S15 (1) of the CCC Act 2002	20+
<b>Queensland laws</b>	
S163 Planning Act 2016, 4500 penalty units \$751,000	30+
S164 Planning Act 2016, 4500 penalty units \$751,000	30+
<b>Trespass</b>	3+

## **21) Responses in relation to broken laws required from you by 3/11/25**

a) It is requested by you and Council to respond David Manteit, by 3/11/2025, to all matters raised in this letter and including responses to which of the laws already broken by your council employees and witnesses (refer table 1) can be consented to be broken by David Manteit, or placed illegally in any hydraulic and civil design, in order to finalize those plans for Council approval.

b) I require you to make a statement that you have read all filed documents.

## **22) 41 pages of RTI records demonstrating your unlicensed Council employees performing of unlicensed non-RPEQ certified Civil earthworks and hydraulic engineering.**

a) An audit of the RTI records by David Manteit has already been filed in Court with substantial evidence of your unlicensed employees performing unlicensed engineering and corrupt conduct S15 (1) of the CC Act 2001 and S115 (1) of the Professional Engineers Act 2002.

- b) You instructed 7-10 Council employees (as per RTI) to prepare and approve unlicensed, flooded, non-RPEQ certified Upstream Drainage hydraulic engineering and approving of plans that nobody asked for. If it wasn't you, who instructed, who was it?
- c) There is now no dispute the pipes were flooded by 1.2m in depth at the Ashridge Rd kerb, and flow velocity of over 30 L/s at the kerb, as per your own shonky winemaster witness Corrigan and lying barrister Susan Hedge now advises.
- d) If you didn't instruct the preparation of these concocted plans with false lot numbers, then who did?
- e) You and your licensed and unlicensed Council employees were found out by your own shonky winemaster witness.
- f) The Upstream Drainage plans prepared included some 61 metres of pipes and pits.
- You and the accused corrupted Council employees have allegedly chosen to flood Darra by flooding the kerb, in both depth, being 1.2 m below the kerb and velocity greater than 30 L/s.
  - Nobody asked you or the accused corrupted unlicensed Council employees to prepare these flooded plans. It was allegedly your (Schrinner and Freeman) instruction to prepare the flooded plans. If not who was it?
- g) If not, please advise who did instruct these illegal red lines and conditions?
- h) The Onsite Drainage plans included a kerb adaptor placed 5.1m from the low side of the kerb which would have caused \$751,000 in fines to the RPEQ, plumber and owner, if built under S163 and S164 of the Planning Act 2016.

## **23) Illegal fill conditions removed by you on 31-1-25**

- a) You (Schrinner and Freeman) or your unlicensed Council employees initially instructed licensed and unlicensed Council employees (with no RPEQ licence) to insert illegal non-RPEQ certified Civil engineering fill conditions in Conditions 12, 17, 18, in the approval dated 25/9/24. Another sham.



You had 4 months to fix up this sham.

You, and the unlicenced Council employees were caught out.

b) Susan Hedge tried to con Judge Williamson KC on 24-4-5 to state that they were removed since they were unnecessary, simply because the fill conditions were not required since S18 already provided for the pipes being built.

**24-4-25 Susan Hedge fill con**

**SUSAN HEDGE**

And then the other... Yeah, so condition 12 might be what Your Honour was thinking about. It's about filling and excavation. Yep. And 12A is submit earthworks drawings prepared by an RPEQ.

Submit to and obtain approval from Development Services Earthworks Drawings. But the Council has actually conceded in its position statement that that condition can be deleted.

Condition 12. Because the purpose of that condition was that to achieve the stormwater outcome, you might need to do some filling.

**JUDGE WILLIAMSON**

Change the topography.

**Hedge - "and there's no need for the fill condition"**

**SUSAN HEDGE**

And so there's no need for the condition. If you're required to do the stormwater outcome, then you're required to do the stormwater outcome no matter what. And so, Mr. Corrigan's solution that he says would work does involve a little bit of filling, but less than one metre.

**JUDGE WILLIAMSON**

Yep.

c) Your own barrister says there's no need for the fill condition 12. But Hedge failed to mention that Council removed Condition 17 - Onsite drainage,

**Susan Hedge sham lies continue - "the condition" is actually "three conditions" removed by Council**

**JUDGE WILLIAMSON**

Change the topography.

**Hedge - "and there's no need for the fill condition"**

"the" is singular. "three is plural"

But there *IS* a need to pay Manteit damages for you and your Council doing nothing for 4 months when there was no need for the **THREE** fill conditons.

You need to explain to the Crime and Corruption Commission why you removed 3 illegal fill conditions and why you refused to respond to Manteit as to the reason for the illegal fill conditions in the first place when your barrister says Hedge says

**JUDGE WILLIAMSON**

Change the topography.

**Hedge - "and there's no need for the fill condition"**

d) However, the fill conditions related to Onsite Drainage as well and in fact the fill stopped Manteit from obtaining a lawful point of discharge for the Onsite lots, since your corrupt employees refused to advise the quantity of fill required and where it

was to be replaced. It was a sham by your Council employees. There was no fill required.

e) The **existing surface level of the land** is as high as 37.00 and the kerb 35.080. That's around 2m higher than the kerb. Your dumbo unlicenced Council employees wanted to fill even higher that 37.0, to make it like Mount Everest.

f) **No response from your corrupted unlicenced council employees**, who did not respond to Manteit due to their attempt to hide from the Crime and Corruption Commission. The ratepayers should be ashamed of the unlicenced Council employees and Schrinner and Freeman. Your time is up.

You need to respond to the Crime and Corruption Commission allegations about the unlicenced employee acts, and soon, your own acts.

g) Manteit asked the unlicenced Council employees, since 1/10/24 where to place the imaginary fill, required in Condition 12,17,18. No response by the corrupted unlicenced Council employees, or you.

**h) Condition 17 Onsite Drainage included fill conditions. You removed those Onsite Drainage fill conditions.** Susan Hedge lied to Judge Williamson KC.

Susan Hedge used the goldfish Corrigan as some sort of scapegoat. Why is Hedge always that stupid?

i) Manteit mentioned to Judge Williamson KC on 12-12-24 in court to His Honour that it could take 500 days for the engineer witnesses to work out where the fill goes, and your approval was a mess due to your fill conditions

Another Susan Hedge sham and an alleged sham by you, since it took you 4 months to remove the fill conditions that were unnecessary, as stated by your own representative in court, 24-4-25.

JUDGE WILLIAMSON

Change the topography.

**Hedge - "and there's no need for the fill condition"**

j) You removed those illegal Civil engineering fill conditions prepared by your unlicenced Council employees on 31/1/25.

Why did you wait four months ? At no stage did you have any queries to Manteit.

Damages will apply.

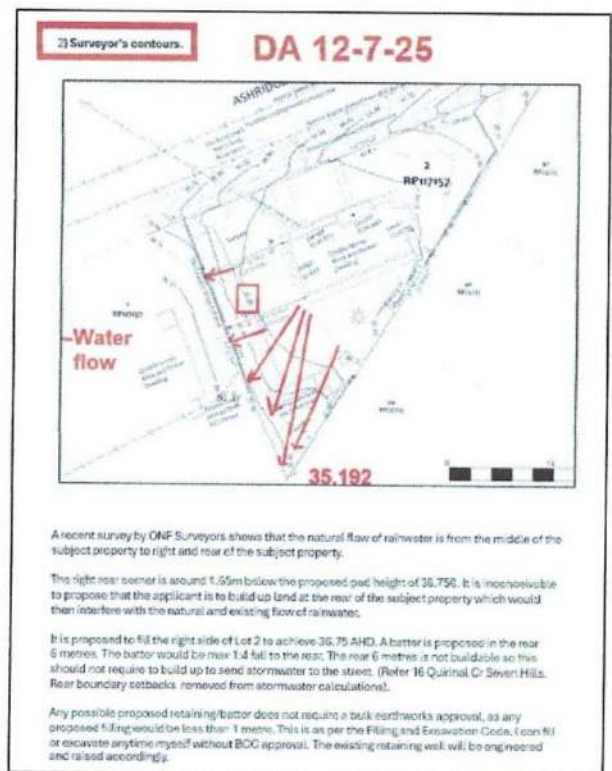


**24) You can't force a judge and an applicant to stare at illegal fill conditions prepared by your unlicenced employees for 4 months.**

a) Why were your licenced and unlicenced employees that incompetent that they **cannot** read a survey plan, provided in the DA on 12/7/24, in order to determine the lay of land?

b) Why did the unlicenced engineer Joel Wake refuse a site visit, to inspect the land, offered by David Manteit, on 15/8/24?

c) Why did **you not use an RPEQ licenced Civil engineer** to assess fill required in the first place? Have you fixed your alleged corrupted engineers to read survey plans yet?



d) How could your licenced and unlicenced employees make so many **intentional errors**? Did you personally train them?

e) The proof of unlicenced Council employees performing corrupt engineering, is voluminous and astounding.

It is my allegation that actions taken by you and your Council employees during assessment between 12/7/24 and 5-8-25, have allegedly been -

- With the intent to **thwart the completion of the development** by Manteit, and
- In order to protect the unlicenced and licenced employees from being found guilty of corruption and prison sentences.
- In order to protect your own reputation as persons responsible for corrupt conduct.

f) Why was there **no information request** sent to Manteit? You and the Council employees were therefore adamant in holding onto those illegal fill and hydraulic conditions for 4 months, come hell or high water.

g) Why did Council officers fail to follow procedure of **informing the applicant** that

a change in red was coming ?

**25) The CCC alleges that you are responsible to stamp out your employee corruption. You were warned in 2020.**

**The CCC has requested you to respond to your systemic employee corruption.**

a) It is alleged that you instructed your Council employees to perform unlicensed Civil (and hydraulic) engineering (evidence - See 41 pages RTI).

If it wasn't you who instructed the unlicensed Council employees to perform unlicensed engineering, who was it?

b) Your Council employees were given warnings by Manteit commencing on 1/10/24 to Margaret Orr and other unlicensed Council employees performing Civil Engineering design and hydraulic design without an RPEQ licence.

No response by them or you to date. Why is that?

d) Your unlicensed Council employees cannot work out that land falls down, with a survey plan lodged with the DA, then you need to pay me **damages accordingly**.

e) Damages due to Council and Council employees for intentional incompetence and intentional delays caused by you and unlicensed Council employees will be claimed.

f) You have had **210 days of chances to remove the red lines** and conditions, but left it until the day of the trial, allegedly to hide your own incompetence and possible corruption charges.

**26) What methods did you use to stop the subject unlicensed Council employee systemic corruption, during the assessment period 12-7-24 and 25-9-24, as per the instructions sent to you by the Crime and Corruption Commission in 2020, plastered on their website ?**

**27) What methods have you employed since 25/9/24 to stamp out systemic unlicensed employee corruption?**

a) What methods do you currently use to stop your unlicensed employees from



performing unlicensed engineering?

## **28) Approved 25/9/24 Upstream and Onsite Drainage plans.**

**Again, you allegedly instructed your unlicensed Council employees to prepare illegal non-RPEQ certified Upstream and Onsite Drainage plans. If it wasn't you, who was it?**

a) Your unlicensed Council employees **refused to provide invert levels** for the pipes to David Manteit, thereby eliminating any chance to construct the hydraulic pipes, causing Manteit damages of \$750,000. Even if the plans were not flooded.

b) **You were aware** that the flow L/s at the kerb was around 76 litres per second based on Council laws, the QUDM and the conservative site cover.

c) You allegedly forced my RPEQ to lose his licence if he prepared fraudulent as constructed hydraulic plans.

d) You forced my plumber to build a pipe that is flooded, that would have caused a \$751,000 fine under S164 of the Planning Act.

e) You provided no information request to Manteit and therefore assumed responsibility yourself.

f) You knew that there was no way for water to traverse above the land

g) You knew that red arrows by Manteit (**as agreed by Corrigan**) indicated that surface water was falling to the rear of the site.

h) My applicant RPEQ would have lost his licence due to designing **Upstream** Drainage pipes that ended up 1.2m under the kerb.

i) **My applicant RPEQ would have lost his licence** due to designing **Onsite** drainage that ended up more than 400mm from the low side of the kerb, being AHD 35.463, instead of 35.083 (as per ONF surveys).

j) I would have been handed a **fine of \$751,000** being an offence under S164 of the Planning Act 2016 if built something contravening the DA approval.

Alternatively I would have been handed a fine of **\$751,000** being an offence by constructing without Council approval.

k) Hence, Manteit could not design nor construct the Upstream and Onsite Drainage plans. This was caused by you and your allegedly corrupted employees.

l) Hence, you have forced the applicant (myself) to incur damages of around \$750,000. This was caused by you and your allegedly corrupt employees.

## 29) How you have thwarted Manteit's application causing damages

**12-2-25 Judge Williamson KC - "you give the Council all the material you want to rely upon a trial, and then I'm going to ask the Council to do the same in return and then we are going to trial."**

### Judge Williamson KC

I do mind. You've had plenty of opportunity. It's my turn. Sorry. This is what I'm going to do. I'm going to order the matters case managed by me. There are not going to be any joint meetings. What we're going to do is, we're going to do this old school.

There's going to be an exchange of material. So Mr. Manteit, you bear the onus, you give the council all the material, you want to rely upon a trial, and then I'm going to ask the council to do the same in return, and then we are going to trial.

And do we have the trial calendar here? Have you got your diary there Ms Hedge?

In the Planning and Environment Court  
Held at Brisbane

Appeal No. 2916 of 2024

Between: **DAVID MANTEIT** Appellant  
And: **BRISBANE CITY COUNCIL** Respondent

**ORDER**

Before: His Honour Judge Williamson KC  
Date of Hearing: 12 February 2025  
Date of Order: 13 February 2025 (on the papers)

**IT IS ORDERED THAT:**

- The appeal be case managed by Judge Williamson KC.
- The spelling of the Appellant's name in the header of the Order of His Honour Judge Williamson KC dated 12 December 2024, being Court Document No. 17 on the Court file, be corrected to 'Manteit'.
- By 31 March 2025, the Appellant is to file and serve all material it intends to rely upon at the hearing of this appeal.
- The appeal be listed for review on 14 April 2025.
- By 21 April 2025, the Respondent is to file and serve all material it intends to rely upon at the hearing of this appeal.
- The appeal be listed for a 3 day hearing commencing on 26 April 2025.

Filed on: February 2025  
Filed by: City Legal - Brisbane City Council  
Service address: Level 20, 266 George Street  
BRISBANE QLD 4000  
Phone: (07) 3178 5581  
Fax: (07) 3334 0058  
Email: sarah.mccabe2@brisbane.qld.gov.au

**ORDER**  
Filed on behalf of the Respondent  
Form PEC-07

**CITY LEGAL**  
Level 20, 266 George Street  
BRISBANE QLD 4000  
Telephone: (07) 3178 5581  
Facsimile: (07) 3334 0058  
Email: sarah.mccabe2@brisbane.qld.gov.au

In the Planning and Environment Court  
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Appeal No. 2916 of 2024

Between: **DAVID MANTEIT** Appellant  
And: **BRISBANE CITY COUNCIL** Respondent

**ORDER**

Before: His Honour Judge Williamson KC  
Date of Hearing: 14 April 2025  
Date of Order: 14 April 2025 (on the papers)

**IT IS ORDERED THAT:**

- By 4.00pm on 16 April 2025, the parties are to provide to each other the name of any witnesses they intend to call to give evidence at the hearing of the appeal. If those witnesses are intended to be called as an expert witness, the area of expertise is to be identified.
- By 4.00pm on 17 April 2025, the Respondent is to provide to the Appellant a list of any objections it takes to the Appellant's evidence and the basis for that objection.
- The time to comply with paragraph 5 of the Court Order dated 13 February 2025 is extended from 21 April 2025 to 22 April 2025.

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Judge Williamson KC stated on 12-2-25 "you ask the Council to do the same and then we are going to trial"

You never "did the same"

You filed all your documents in contempt of Court.

**30) You have contravened the intention of Judge Williamson KC in that you should have filed all material you rely on, by 21/4/25, but have intentionally filed all of your material after 21/4/25, and also after the extended 22/4/25. Why? Why prejudice my appeal?**

23/04/2025	Affidavit	AD CORRIGAN & EXHS ADC-1	Respondent
23/04/2025	Affidavit	K RYAN & EXHS KR-1	Respondent
14/04/2025	Order	WILLIAMSON KC DCJ - 14.04.2025	Respondent
24/04/2025	Affidavit	of SJ MCCABE & exh "SJM-1" - "SJM-3"	Respondent
24/04/2025	Affidavit	OF: S J MCCABE, EX SJM-4	Respondent
24/04/2025	Certificate	OF: K FREEMAN, EXS 1- 26 ( VOLUME 1 OF 2)	Respondent
24/04/2025	Certificate	OF: K FREEMAN, EXS 27 - 29 ( VOLUME 2 OF 2)	Respondent
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15/05/2025	Application	LISTED 29/5/25	Respondent
15/05/2025	Outline of Submissions	RESPONDENT'S SUBMISSIONS REGARDING SCANDALOUS MATERIAL	Respondent
28/05/2025	Affidavit	OF D. MANTEIT	Applicant

**SUSAN HEDGE 24-4-25**

Yes. Well, I do have, in fact, Your Honour, working copies of the reports of Mr Corrigan and Mr Ryan, which have been filed. They were filed on the 23rd of April, yesterday. But I have a working copy for Your Honour, if you would find that helpful.

**JUDGE WILLIAMSON 24-4-25**

So, if the hearing proceeds as we've covered this morning, objections, or the material is treated in the way that we've discussed, is there anything else from the council side that needs to be dealt with before Monday?

**"is there anything else that needs to be dealt with before Monday?"**

**SUSAN HEDGE**

No, I don't think so.

**24-4-25 Judge Williamson KC "Is there anything else that needs to be dealt with before Monday?"**

## **Hedge - "No I don't think so"**

Hedge stated on 24-4-25 that "no other approval was required" (prior to hydraulic pipe construction).

However, later that day, Council lodged a totally different position that states Manteit must lodge RPEQ plans prior to construction.

### **31) Council's change in RPEQ submitting drawings**

**SUSAN HEDGE**

17, which is the on-site drainage.

**17 - "also just requires the submission of the as-constructed drawings"**

**SUSAN HEDGE**

**Timing - notation of the plan of subdivision"**

Also just requires the submission of the as-constructed drawings. And could I just indicate the timing of the submission is prior to Council's notation on the plan of subdivision?

**JUDGE WILLIAMSON**

Yeah, prior to sealing, yeah.

**24-4-25**

**SUSAN HEDGE**

**"and the Council's position is that no other approval is required" - Susan Hedge lie.**

Yes. Well, there is, if it assists. The current conditions as they are do not identify a required engineering solution. They are an indicative solution. And then a RPEQ-designed solution is to be implemented.

Your Honour asked me at the last review about whether a further operational works approval or some other approval is required, and the Council's position is that no other approval is required.

Mr. Ryan's dealt with that in his report, so as to provide an expert opinion about that.

**JUDGE WILLIAMSON**

But the conditions themselves require the submission of an engineering plan.

### **32) Council's intentional actions**



a) You have insisted on the Upstream Drainage and Onsite Drainage red line pipes being lawful until the day of the trial 28-4-25.

b) Manteit did not cause any delay in the proceedings.

c) **You had 7 months to redact the red lines.** You did that on 28-4-25, 7 months after the approval date of 25-9-24.

d) You, Council and Council employees were **forcing Manteit**, the applicant RPEQ engineer, civil contractor and plumber, to be **fined by Council and lose their licences** for life, by the actions of you and the Council employee Upstream Drainage and Onsite Drainage hydraulic designs.

e) The consequences of contravening of S164 of the Planning Act means that fines of \$750,000 apply to Manteit if the pipes were built the pipes which contravened the DA approval. **The pipes could not have been constructed.** You stopped the development for 7 months. Damages apply.

f) Obtaining approval from of **"another way"** of some other solution that worked (all hypothetical, as it was not possible) was impossible to obtain, as it would not have been generally in accordance with the original red lines (refer Judge Williamson KC comments 30-4-25).

g) The **breaking of S163** of the Planning Act meant that fines of \$750,000 apply if the owner constructs something that is not approved. The pipes could not have been constructed.

h) Council employees were forcing **any applicant RPEQ engineer to lose their licence** by providing flooded as constructed Upstream Drainage plans and Onsite Drainage plans that were greater than 400mm from the low side of the kerb.

i) You **continually requested extensions for filing of affidavits.** All in contempt of Court.

### **33) No opportunity for the applicant to obtain Council approval of plans prior to constructing the Upstream Drainage pipes 1.2m under the kerb.**

a) There was no process in the original DA whereby the applicant could present to Council any modified RPEQ plans.

Any changes would not be considered generally in accordance.

The position of Council on 31-1-25 was that it was "one way". You categorically stated therefore red lines worked.

Why do you employ such incompetent Council employees?

Why do you not audit your Council employees for systemic corruption?

The fact that Council changed condition 18 on the opening day of the trial to include allowance for the applicant to be able present an applicant RPEQ plan is admittance by Council that there was no way previously that Manteit could have lodged any change to the red hydraulic lines in the past.

Hence, another proof of a future valid damages claim against you and Council employees. Thanks for that.

**34) You have failed in your responsibilities to the ratepayers and the CCC to control and audit your corrupt employees.**

**35) Your CEO (prior to Freeman) was given a warning in 2020 by the CCC to make sure you audited your Council employees and train them not to become unlicensed engineers**

**You were supposed to have a method of auditing to stop systemic employee corruption. You didn't.**





Factsheet | December 2020

## Corrupt conduct and professional engineering services



### Advice for all UPAs in relation to professional engineering services

In relation to the complaint described at the beginning of this factsheet, the CCC assessed this complaint as suspected corrupt conduct and wrote to the Board of Professional Engineers, requesting them to deal with the allegations. The CCC also wrote to all council CEOs requesting that they conduct an audit of any positions that employed engineers, to ensure they were providing those services in a manner which was compliant with the Professional Engineers Act 2002.

To prevent any recurrence of such complaints, all UPAs should:

- Review the registration status of employees undertaking engineering services, to ensure compliance with the Professional Engineers Act 2002
- Take appropriate action to address practices, if any, contrary to the Professional Engineers Act 2002, and
- Flag such matters with their internal audit and risk units

### Application of the definition of corrupt conduct to engineers' work

The definition of corrupt conduct could apply to you if:

- You work for an agency that is within the CCC's jurisdiction, and
- Your conduct is in breach of a law (e.g. the Professional Engineers Act 2002), and thus a criminal offence.

For example, you could be meeting the three criteria for Type A corrupt conduct:

- If you carry out your work – the function or activity you perform as part of your employment – in a manner that is contrary to the law, as the conduct **could adversely affect** that function. *(Effect of the conduct)*
- If the manner in which you work results in the performance of the function in a way that is a **breach of the trust** placed in a person holding the appointment. *(Result of the conduct)*
- Because a contravention of section 115(1) of the Professional Engineers Act is a criminal offence, so, if proved, it would be a **criminal offence**. *(Seriousness of the conduct)*



### Further information

For further information about the CCC or the complaints process, go to: [www.ccc.qld.gov.au](http://www.ccc.qld.gov.au)

For more information about professional engineering services, contact:

- Board of Professional Engineers of Queensland: [www.bpeq.qld.gov.au](http://www.bpeq.qld.gov.au)
- Institute of Public Works Engineering Australasia, Queensland: [www.ipweag.com](http://www.ipweag.com)
- Engineers Australia: [www.engineersaustralia.org.au](http://www.engineersaustralia.org.au)
- Professionals Australia: [www.professionalsaustralia.org.au](http://www.professionalsaustralia.org.au)

- a) You are responsible for your own actions as well as the unlicensed Council employees.
- b) The individual accused corrupted unlicensed Council employees also have responsibilities and may incur a fine of up to \$137,000 each and/or prison.
- c) As per **S34 and 35 of the Crime and Corruption Act 2001**, you have a duty to investigate Council employee Corruption, known as the process of devolution.

**How we assessed your complaint**

In considering the additional material you have provided, the CCC has determined to change our original assessment decision and determined your complaint is appropriate to refer to the council.

This decision is considered appropriate because all government agencies, including the council, are required to take responsibility, and be held accountable, for the performance and behaviour of their own staff. When making a decision about how to deal with a complaint, the CCC must apply the principles set out in s34 of the Crime and Corruption Act 2001 (CC Act). One of the key principles is known as 'devolution', and states that actions taken to deal with corrupt conduct, including investigation, should occur in the agency where the conduct is alleged to have occurred. This should happen in all instances, unless it can be established that it is in the public interest for the CCC to deal with the matter.

- d) I have made the CCC aware that this matter is a public interest matter.

**JUDGE WILLIAMSON**

**24-4-25**

Given this is public interest litigation, public interest litigation, my inclination is to let the material in and we deal with it. And what I mean by that is...

- e) Your flooded hydraulic plans have caused flooding to Darra. Eight flooded plans so far.

### **36) Your approved Upstream drainage plan causes a flood to the residents of Darra.**

- f) These Onsite Drainage and Upstream drainage hydraulic plans were the only approved Upstream Drainage plans with **Council employee red hydraulic lines and conditions.** in 412 Brisbane City Council cases that were prepared by Council employees for the calendar year, 2024.

Why is that ?

- g) The Upstream Drainage hydraulic plan was flooded pipes in both depth (1.2m



below the kerb) and flow velocity at the kerb ( $> 30$  L/s). You knew that.

Why did you maintain the validity of those flooded hydraulic plans for from 12-7-24 to 28-4-25, being 280 days ?

You had 280 days to make changes to the red lines. You chose not to, until the day of the trial. Why?

You will need to tell the answer to the next judge.

Who forced Susan Hedge to lie for 7 months?

### 37) Corrigan report

a) Corrigan has intentionally and allegedly fraudulently compiled an incompetent report that breaks many Council laws that you and Council relied on.

Why did you instruct this shonky report?

The summary starts on page 60.

b) The list of Council laws broken by Corrigan is endless.

You should be very ashamed to use ratepayers money for the preparation of this shonky report.

c) Why was the shonky Corrigan report prepared ? What was the reason?

d) You know very well that the past condition 18 and the current condition 17 require the applicant to adhere to the appropriate codes and Brisbane Planning Scheme Policies.

Why did you instruct Corrigan to allegedly break Council codes and Brisbane Planning Scheme Policies?

**Susan Hedge**

#### **Hedge 29-4-25 - after the approval of the drawings**

And is your view that that timing for 18b that is the implementation of the certified stormwater drawings that occur prior to council's notation on the plan of subdivision and after the approval of the drawings. Is that a reasonable response to the planning scheme provisions that are relevant?

**Corrigan**

Yes, I think it's a reasonable response. I think it adds, the addition adds some clarity to ensure that the approval is obtained prior to those works being carried out.

Hedge used Corrigan as the scapegoat for changing condition 18 to require that the RPEQ is to lodge drawings prior to constructing the pipes.

### 38) Ryan report

**24-4-25 "I don't think I can assist with that question. Its a matter of engineering design"**  
**Keiran Ryan**

I'm sorry, I don't think I can assist with that question because it's a matter of engineering design, which is outside my expertise.

**David Manteit**

Right, that's sort of, because there are other ones there, I don't want to bore you to tears, coefficient, you know, it's in the town plan. So, would you say that anything with a number from the town plan that you can't assist?

**Keiran Ryan "I can't assist. ..is a matter of engineering"**

No, I wouldn't say anything with a number I can't assist, but this section that you've taken me to is a matter of detailed engineering design that I can't assist with.

**David Manteit**

We're not reading it out, but have you ever known council to support lot-based stormwater detention facilities in a residential subdivision on, I will read it out a bit, on freehold lots at all in your experience? And if you have, could you give me the address?

**Ryan - "I don't recall examples where they did or didn't"**  
**Keiran Ryan**

I don't recall examples where they did or didn't, I'm sorry. I think anything, and so, as a town planner, we would normally defer these matters across to the development engineer when it comes to a development application, either assessing or lodging. So, I can't give you examples where they were, and I can't give you examples where they are not. I'm not trying to be unhelpful, but again, I think matters, particularly within this planning scheme policy, I think are largely matters outside my expertise.

**Ryan - "matters, particularly within this planning scheme policy, I think are largely matters outside my expertise"**

Ryan has demonstrated incompetence in knowledge of engineering and Planning Scheme policies. He could not assist with S7.5.3.6 rainwater tanks.

Why would Schrunner pay for this non-town planning expert?



### 39) Written response required by Council

A written response by you is requested as to what -

- Brisbane City Council Planning Scheme Policies
- Brisbane Standard Drawings (as referred to in the Brisbane Planning Scheme Policies)

are allowed by Brisbane City Council to be broken by the applicant's engineer in designing the Upstream Drainage drawings and engineering calculations for Condition 17, Court order, 6/5/25, of AOO656555.

If there are no laws allowed to be broken then you need to consider what alternatives you may offer, by 3/11/25. I have previously given you warnings of the next stages in the process.

### 40) The "Council employees" are:

Andrew Blake -  
Lucy Ting -  
Margaret Orr -  
Joel Wake -  
Scott Ruhland -  
Zarndra Piper -  
Roger Greenway -

These licenced and unlicenced Council employees performed allegedly corrupt unlicenced engineering. The unlicenced engineers have committed allegedly corrupt engineering as defined by S15 (1) of the Crime and Corruption Act 2001 and S115 (1) of the Professional Engineers Act 2002.

There were at least 10 Council employees allegedly "**in on the act**" and were made aware that Andrew Blake approved for the illegal flooded red hydraulic lines and illegal fill conditions to be placed on the approval, without informing Manteit. These 10 Council employees are listed in the email from Lucy Ting below.

The Council employees refused to supply to David Manteit any RPEQ signoff for their own Upstream Drainage and Onsite Drainage hydraulic plans -

- 81 metres of red lines,
- 6 stormwater pits and

- 2 kerb adaptors.
- Fill conditions

**From:** Lucy Ting  
**Sent:** Monday, 2 September 2024 1:35 PM  
**To:** Margaret Orr; Darren Evans; Beau Reichert  
**Cc:** George Kaithakkottil; Joel Wake; Zarndra Piper; Scott Ruhland; Emma Mezzina; Brendan Gillham; Margaret Orr; Darren Evans; Beau Reichert  
**Subject:** 128 ASHRIDGE RD DARRA (A006565555)  
**Attachments:** 20240902131637717.pdf

Hi Scott & Joel

Following on from my MS Teams conversation with you both last Thursday 29/08/2024, I also spoke with Andrew Blake today. The development proposal can be approved with the Site drainage mind condition and the Upslope property drainage connection referencing the attached Stormwater Drainage Plan as marked up by TST Hydraulics.

Regards  
 Lucy Ting  
 Senior Engineer | Development Services  
 City Planning & Sustainability | BRISBANE CITY COUNCIL

Brisbane Square | 266 George Street BRISBANE QLD 4000  
 Phone: 07 3403 5005 | Fax: 07 3403 4291  
 Email: [lucy.ting@brisbane.qld.gov.au](mailto:lucy.ting@brisbane.qld.gov.au)

**Above - Lucy Ting informing 10 Council unlicensed employees of impending secret red lines, without Manteit's knowledge.**

Work Request			
Assigned To:	RUHLAND, Scott	From Date:	12 July 2024
Due Date:	26 July 2024	Completed:	Y
Request Type:	Code	Actual Date:	24 July 2024
Advice Type:	Engineering		
Key Issues:	ROL - 1 into 2		
<p>If there are any Engineering questions regarding this application, please see me.            Cheers,            Scott.</p>			

**Example of Scott Ruhland unlicensed engineer providing engineering information**



#### **41) You allegedly continue to hide, only to put off the inevitable**

Your actions have been to allegedly continuously hide the actions of your licenced and unlicenced employees, from the Brisbane public. You are now under investigation by the Crime and Corruption Commission for the actions by your alleged corrupt employees and your own actions and failure to stop the systemic Brisbane City Council corruption.

#### **42) You and your Council employees have thwarted and prejudiced my appeal.**

There will be further allegations to the Crime and Corruption Commission of Freeman's actions that were alleged to thwart the prosecution by Manteit of his case 2916/24 in the Planning and Environment Court.

#### **43) Your attempt to stop the Council employees being witnesses at trial**

Council provided no Council engineers as witnesses at the trial. You continue to hide.

In addition you gave instructions for them not to attend the trial. Why hide?

Why did you attempt to hide your Council employees pitiful engineering by your court claim on 29/5/25.

#### **44) Refusal by you to supply Council easement document**

a) Magaret Orr and other Council employees, refused to supply the Council easement document to Manteit, since requested by Manteit, on 1/10/24. This impaired the applicant's ability to both construct the approved hydraulic pipes and subsequently prosecute his case in the Planning Court.

b) Schrunner and Freeman have allegedly intentionally instructed the licenced and unlicenced Council employees to withhold the easement document from Manteit which has impacted on the ability for Manteit to prepare a Court application.

c) Schrunner and Freeman have intentionally instructed Susan Hedge and Sara McCabe to withhold the providing of the document from Manteit to thwart Manteit's ability to run the prosecution of his case against Council 28-30 April 2025.

**45) Judge Williamson KC forced Council and Susan Hedge to come clean and provide the easement document to Manteit, on the last day of the trial, 30-4-25. (transcript).**

The damages claim will include the alleged intentional delay of withholding the easement document by Schrunner, Freeman, Council employees, Council, Sara McCabe, Susan Hedge



## **46) Contempt of Court**

**It is anticipated that a contempt of Court application will be filed in the near future by Manteit.**

**This discussion below is not an exhaustive list of material to be provided for the anticipated contempt of Court case, but purely a tiny sample.**

There is alleged to have been contempt of Court in the case Manteit V Brisbane City Council 2916/24 by -

Susan Hedge - Counsel for Brisbane City Council  
Sara McCabe - Council employee  
Dr Kerry Freeman - CEO  
Adrian Schrinner- Lord Mayor

### **"The accused persons"**

### **Overall intent**

It is alleged that the abovementioned individuals have taken or played a part, either fully, or partially, into -

- Thwarting and prejudicing Manteit's case for want of protecting Crime and Corruption claims and damages claims against them by Manteit.
- Hiding alleged corrupt conduct of the licenced and unlicenced Council employees of performing allegedly corrupt Civil and Hydraulic engineering.

These actions invite offences under -

- S115 (1) of the Professional Engineers Act 2002,
- Schedule 2 of the Professional Engineers Act 2002 and
- S15(1) of the CCC Act 2001.

This corrupt conduct by Council employees may invite prison sentences for the employees.

- Hiding of actions of certain Council employees performing Civil and Hydraulic engineering that is Unsatisfactory Professional Conduct, of a registered professional engineer, which invites offences under Schedule 2 of the

Professional Engineers Act 2002.













If these actions are found to be of a substantial nature, it would allegedly invite offences under corrupt conduct provisions of the CC Act.

- Alleged hiding from any possible Crime and Corruption investigations of them due to inaction over their responsibility to control systemic corruption.

## Deliberately filing of affidavits and statements in contempt of the court orders

The accused allegedly deliberately lodged Court files after the required Court order date, being in Contempt of court orders.

All Council's files you relied on for the trial were in contempt of Court, being **filed after the date of the Court order?** .

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Date of Hearing: 12 February 2025  
Date of Order: 13 February 2025 (on the papers)

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1. The appeal be case managed by Judge Williamson KC.
2. The spelling of the Appellant's name in the header of the Order of His Honour Judge Williamson KC dated 12 December 2024, being Court Document No. 17 on the Court file, be corrected to 'Manteit'.
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Filed by: City Legal – Brisbane City Council  
Service address: Level 20, 266 George Street  
BRISBANE QLD 4000  
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**ORDER**  
Filed on behalf of the Respondent  
Form PEC 07

**CITY LEGAL**  
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**ORDER**

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2. By 4.00pm on 17 April 2025, the Respondent is to provide to the Appellant a list of any objections it takes to the Appellant's evidence and the basis for that objection.
3. The time to comply with paragraph 5 of the Court Order dated 13 February 2025 is extended from 21 April 2025 to 22 April 2025.

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**ORDER**  
Filed on behalf of the Respondent  
Form PEC 07

**CITY LEGAL**  
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Judge Williamson KC stated on 12-2-25 "you ask the Council to do the same

**SUSAN HEDGE**

**Court 24-4-25**

So the court order required that to be done on Tuesday 22 April. I understand.

The fact that it's outside of business hours is the reason that Mr. Monteith says that it was unlawful. So, just bring that to your honour's attention.

- The action to deliberately disobey court orders by Schrinner and Freeman, with the intent on causing Manteit to be prejudiced in his appeal.

Original court order file due date 21/4/25 , which meant that Council should have filed in court on	17/4/25
Council filed Ryan and Corrigan report	23-4-25
Council filed Freeman affidavit	24-4-25
Council filed McCabe affidavit	24-4-25
Council file McCabe new position after hearing 24/4/25	24-4-25

**Freeman and Schrinner have intentionally filed these affidavits (including one from Freeman herself) in contempt of Court.**

### **Knowingly withholding of flooded plans for 7 months.**

The accused persons above knowingly withheld of the alleged corrupt Council employee Upstream Drainage flooded to the Court that the Council employee Upstream Drainage was flooded was flooded 1.2m under the Ashridge Rd kerb.

**The accused persons are alleged to have been aware of the Council employee flooding since 25/9/24.**

**Susan Hedge said on 31-1-25 this was "one way"**



Notations in red on approved plan

**31-1-25 Susan Hedge**

14. The notations identified in red on the Approved Plan:

**"Represent one way"**

- (a) are administrative in nature (for example, the identification of the plan and drawing number); or
- (b) as indicated, they are "indicative" only and represent one way, but not the only

**SUSAN HEDGE**

**24-4-25 Hedge "It won't work"**

Mr. Corrigan... So, the Civil Works Engineers report says that where the red line is, the indicative line on the plan, that that won't work.

**Hedge - "that won't work"**

**JUDGE WILLIAMSON**

Okay. Well there we go.

**Judge Williamson KC - "Well there we go "**

**SUSAN HEDGE**

That's Civil Works Engineers. That's the letter. Yes.

Mr. Corrigan agrees that where that red line is, like if you take a literal interpretation of what is in fact an indicative drawing, then that will not work. **"then that won't work"**

He's identified two other ways that you can achieve the outcome of the condition, which is to provide upslope drainage.

**Hedge - "He's identified two other ways that you can achieve the ....condition."**

**JUDGE WILLIAMSON**

Yep.

**Susan Hedge said on 24-4-25 "It won't work"**

The unlicensed Council employees were made aware of their flooded plan by Manteit around 16/10/24.

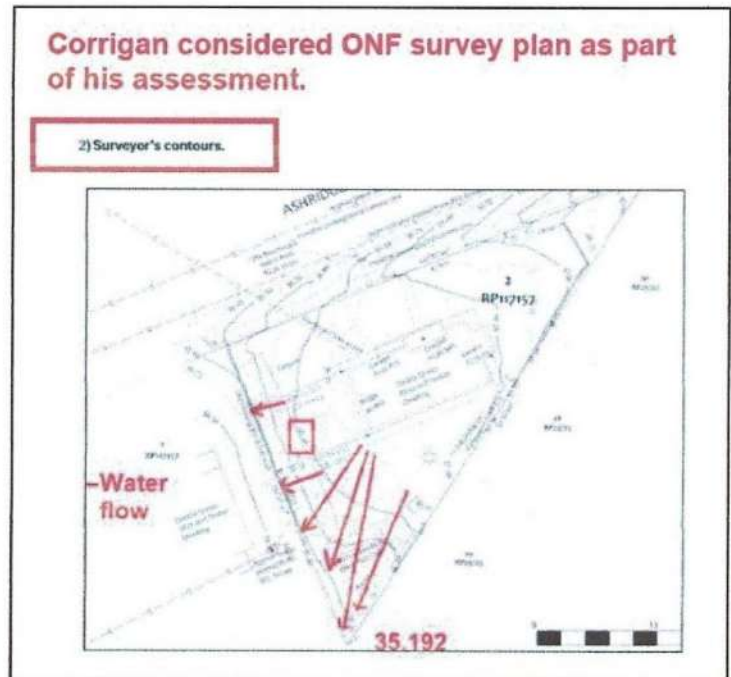
This relates to S7.6.5 "That part of the lot that would drain through the development"

Any fool could see that it was flooded.

Manteit provided a survey plan on 12-7-25.

**It stated in bold red 35.192 at the rear.**

**It stated 35.25 at the kerb.**



**Guess what - the land sloped uphill as of 12/7/24**

**That does not take into account 450 cover, pipe width 300 mm and fall of 250 mm.**

Note that the survey plan was provided by Manteit in the DA application for all allegedly corrupt licenced employees could see.

Note that the survey plan has been acknowledged twice by Corrigan.

**24-4-25 False statement by Susan hedge to Judge Williamson KC - "Council's position for the trial is as of 31-1-25"**

a) Susan Hedge **lied to Judge Williamson KC** on 24-4-25 by making many allegedly fraudulent statements that Council's position for the trial was as of 31/1/25.

b) The Susan Hedge lies on 24-4-25 to Judge Williamson KC **forced Judge Williamson KC to state lies to David Manteit 13 times**, at the Court hearing on 24/4/25, stating to Manteit that Council's position for the trial was as of 31/1/25



It is a lie by Judge Williamson KC if His Honor had knowledge that 31-1-25 was not Council's position. If Judge Williamson KC did not have knowledge of the Council's fake position of being as of 31-1-25, then Judge Williamson KC has not lied.

The alternative theory means that Susan Hedge has simply told lies, and was dishonest not to correct Judge Williamson KC statements 13 times.

Susan Hedge has used lies to deliberately prejudiced Manteit Court's case.

c) Sara McCabe handed Susan Hedge a copy of Court document 23, when Hedge asked her for Council's position. McCabe is guilty by her actions.

d) It is alleged that Schrinner and Freeman **instructed Susan Hedge to lie in Court, 24-4-25 to protect their own reputation and possible charges.**

e) Somebody gave the orders for Susan Hedge to lie. The persons that had the authority to instruct Hedge are Schrinner and Freeman.

**Schrinner and Freeman need to come clean to set the record straight.**

f) Manteit took Susan Hedge's words in good faith. And Judge Williamson KC, it seems, as well.

g) It would have been known for some weeks or months prior to 24-4-25 of Council's position to remove the red lines and prepare appropriate wording.

h) What date did you instruct for the changes to the red lines and conditions made, Lord Mayor and Freeman?

**Did the person who removed the red lines have an RPEQ licence? This is another matter that needs to be investigated by Freeman and Schrinner.**

a) What Council employee removed the red lines? Was that person an unlicensed accused corrupt unlicensed employee?

Only a licenced RPEQ engineer is legally able to design by modifying 81 metres of Upstream and onsite Drainage

**Susan Hedge lied to Judge Williamson KC and states condition 18 is**

**the one that is of most concern**

**Unlicensed Council employees designed Onsite Drainage was a concern by Manteit in all 10,000 pages of filed documents.**

**It was a concern that my RPEQ and plumber was not able to design any pipes that contravened the DA and invites a penalty of of \$164,000.**

**24-4-25 Stating to Judge Williamson KC – Hedge "he has everything he needs in exactly the form that will be filed or relied on"**

Judge Williamson KC asked Susan Hedge -

**"Ms Hedge, has Council provided all of its material to Mr Manteit ?"**

**Susan Hedge then lied to a Judge and stated "he has everything he needs in exactly the form that will be filed or relied on"**



JUDGE WILLIAMSON

## Court 24-4-25

Ms. Hedge, has the Council now provided all of its material to Mr. Monty?

SUSAN HEDGE

I can't say yes or no to that, so if I can explain.

We've provided the two affidavits which are attached, reports of the two expert witnesses to be called by the Council.

That's Mr. Kieran Ryan in the area of town planning and Mr. Andrew Corrigan in the area of civil engineering.

We've provided a draft CEO certificate, and that's the only reason I can't say yes is because it's still in draft.

The reason for that is that the CEO has been ill.

I'm not aware of the details of that, but sufficiently ill as to be not in the office to sign the CEO certificate. So I expect to have a signed one in exactly the same form by Monday.

But that's the only reason I can't say 'yes'— he has everything in exactly the form that will be filed or relied on.

JUDGE WILLIAMSON

**Has the Council now provided all of its material to Mr Monty ?**

Ms. Hedge, has the Council now provided all of its material to Mr. Monty?

SUSAN HEDGE

I can't say yes or no to that, so if I can explain. We've provided the two affidavits which are attached, reports of the two expert witnesses to be called by the Council. That's Mr. Kieran Ryan in the area of town planning and Mr. Andrew Corrigan in the area of civil engineering.

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**Hedge - that's the only reason I can't say yes**

But that's the only reason I can't say 'yes'— he has everything in exactly the form that will be filed or relied on. I do have an affidavit that identifies the things that have occurred since the last review. Could I seek leave to read and file that affidavit of Sarah Jane McCabe. dated 24 April 2025?

**Hedge - that's the only reason I can't say yes**

JUDGE WILLIAMSON

You can leave.

# 24-4-25 Judge Williamson KC - "Ms Hedge, has Council now provided all of its material to Mr Manteit ?"

## **Susan Hedge then lied to Judge Williamson KC and state "he has everything he needs in exactly the form that will be filed or relied on"**

I allege that you (Schrinner and Freeman) had already instructed a completely different position to Hedge, up to 2 months earlier, as it would have taken some time to change the Upstream Drainage red lines and Onsite Drainage red lines.

I allege that Schrinner and Freeman instructed Susan Hedge to lie, in order to protect their own interests and the accused corrupted Council employees.

**24-4-25 Susan Hedge stated that Council's position before the trial is that RPEQ plans should be lodged after construction and then one business day later states to court that RPEQ plans must be provided before construction.**

**Hedge gets 2 witnesses to say it's reasonable to have RPEQ plans lodged before constructing the pipes.**

### **Discussion of red lines in court 24-4-25.**

a) Susan Hedge sat down listening to Manteit and Judge Williamson KC discuss the red hydraulic lines ad nauseum on 24-4-25.

b) Hedge did not utter a word about red lines until she said she needed to "put the cards on the table"



**Judge Williamson KC**

**24-4-25**

(00:04) Monty and Brisbane City Council, appearances please.

**Susan Hedge**

(00:08) May it please the court, my name is Hedge, spelled H-E-D-G-E, initials SJ. I appear for the respondent, Brisbane City Council, instructed by City Legal.

**Judge Williamson KC**

(00:17) Thank you. Yes, Mr. Monty

**David Manteit** (00:18)

Monty. Yes, Monty. Monty, should I start the day off this morning, Your Honour?

.....  
impinging my time, because if the witnesses were to arrive, then I don't have my engineering response. And that might be contended that anything I say on engineering is not valid. So that's on this basis, Your Honour, that we need to look at the red lines. I've said, Your Honour, back in November, it'll be 500 days before the engineers can work out what the red lines are. And I have mentioned to Your Honour, I hope that Your Honour knows exactly what the red lines are, because I don't. So we need to work out what the red lines are and the proof of this case starts with things that are unlawful. So whether they can

.....  
my proof, number one, besides 10,000 other proofs. Then we can move on to hydrology. There's three laws just in the on-site drawings that are not complied with. There's more laws, but that's the first law that must be dealt with. We've got to find out the red lines beca

.....  
the assessment of the assessment manager in this court is one more step than the assessment manager in the council. The assessment manager in the council doesn't have conditions from another approval, but this court's got to go back to what they see in those red lines and refer to those red lines. But if you don't know what the red lines are, how can you refer to the red lines? And then if the red lines stay in the approval, well, that's unlicensed. Everyone's got to find out about that. So I'll let, because of time, back to you, Your Honour, if you don't mind.

**Judge Williamson KC**

(05:38) Thank you.

**Susan Hedge sat in court completely silent, when red lines were discussed.**

**Freeman did not sign the S232 statements until 24/4/25, intentionally prejudicing Manteit's case.**

Why did Freeman only sign this document on 24-4-25, knowingly in contempt of court ?

**How much money has Schrunner and Freeman spent of ratepayers money on 7 flooded plans?**

Please advise how much money you have spent to date, on the case AO6565555

and the trial.

All this is wasted moneys. Will you hide the cost of that as well?

## **Fake document handed to Judge Williamson KC on 12-12-24**

- Intentionally handing by Susan Hedge to Judge Williamson KC a false document, on 12-12-24 with the wrong name of the Appellant.
  - Manteit gave Sara McCabe and Susan Hedge 3 warnings to fix up the name or be considered for contempt of court. No response.
-





## Susan Hedge false statements to Judge Williamson KC 24-4-25

JUDGE WILLIAMSON

**Court 24-4-25**

Well, sorry. I thought... They have given... Council have given position statements. That's their response. (1st) But the submissions. Council, you'll be ....that's Wednesday of the trial after the evidence is closed. Just like you will have an opportunity to...

DAVID MANTEIT

Well, correct me if I'm wrong, but the 600 pages of the chief executive, I couldn't see any positions in there about red lines or anything like that. I couldn't see. I don't know of any of their positions, but I'll have a look at that if that material is accepted.

JUDGE WILLIAMSON

Sorry, I thought a position... Council had filed a position statement. (2nd)

SUSAN HEDGE

Yes, I'll find out. do you have the court document? (to Sara McCabe). It was filed on the 31st of January.

JUDGE WILLIAMSON

Yep (3rd)

**Court  
24-4-25**

SUSAN HEDGE

It's about a two-page document.

JUDGE WILLIAMSON

Yep (4th)

SUSAN HEDGE

Court document number 23.

JUDGE WILLIAMSON

Ok (5th)

DAVID MANTEIT

Oh, sorry, that is the notice of dispute.



Yes (9th)

DAVID MANTEIT

## Court 24-4-25

So we can say that rainfall..

.Stormwater falls down. There'll be extra stormwater. Okay, thanks for that. So that's the position?

JUDGE WILLIAMSON

That's Council's position. (10th)

That's the position (11th)

DAVID MANTEIT

## Court 24-4-25

But there was a position to get rid of the fill conditions. So that is taken as fill conditions are gone. 31st March. That is their position?

JUDGE WILLIAMSON

Correct (12th).

DAVID MANTEIT

Start afresh, but that was their position.

JUDGE WILLIAMSON

Yep (13th time)

There are numerous lies stated by Susan Hedge and Sara McCabe. And 13 forced lies (if you call them that, or misstatement) by Judge Williamson KC out of his control, due to Susan Hedge and Sara McCabe lies.

What part did Adrian Schinner and Dr Kerry Freeman play in the Susan Hedge lies?

Judge Williamson KC, on 24-4-25, seemed to be unaware that Condition 18 did not require submission of any engineering drawings until the pipes were constructed. This in itself is a problem that a judge did not know what the condition was.

However, that has forced dumbo Hedge into confirming that the correct statement that Council's position as of 24-4-25 was that conditions 17 and 18 were "as constructed" conditions, meaning there was no requirement or possible way for Manteit to lodge RPEQ drawings until after the flooded pipes were built.

**JUDGE WILLIAMSON**

That's not the condition I have in mind. There's another condition which talks about, I thought, a submission of an engineering plan, but that's...

**SUSAN HEDGE**

17, which is the on-site drainage.

**SUSAN HEDGE**

Also just requires the submission of the as-constructed drawings. And could I just indicate the timing of the submission is prior to Council's notation on the plan of subdivision?

**JUDGE WILLIAMSON**

Yeah, prior to sealing, yeah.

## **24-4-25 Susan Hedge to Judge Williamson KC**

**"Condition 17 and 18 - RPEQ drawings are required after construction of pipes."**

**"The Council's position is that no other approval is required"**

**My witness Ryan says so in his report.**

**Susan Hedge woke up on 28/4/25, one business day later.**

**Susan Hedge - "Council's position is that RPEQ drawings are required prior to construction"**



**"Hedge forced two witnesses to change their recommendation of the new condition to RPEQ drawings required before construction."**

**This is admittance by Susan Hedge, Freeman and Schrinner that Manteit had no way to present or even talk to Council about a solution since any change to the DA required an application to Court.**

**Council never asked Manteit to file any changes to red lines. There was no way, that would not incur a fine of \$751,000 and possible imprisonment.**

**SUSAN HEDGE**

**24-4-25**

I'll just have to confirm that. I thought it was more in the matter of the system had to be designed by an RPEQ here, but not necessarily that Council had to approve it.

**JUDGE WILLIAMSON**

But that's why I thought approval was required, because the Council gets the opportunity to ensure that the system that is adopted or designed meets the condition. And that must happen before siteowrks commence.

**JUDGE WILLIAMSON**

Yeah, sure, of course. If I've got that wrong, I've got it wrong.

**SUSAN HEDGE**

Yes. So Condition 18, which is the upstream connection condition, which seems to be the one most in debate, the main condition is to provide a stormwater drainage connection for certain upstream lots. And then the sub-conditions are: I'm just giving you the short version, prepare stormwater drawings, which have to be certified by an RPEQ. Then implement those certified stormwater drawings is 18B. And then 18C is submit as constructed drawings to the council. And the timing of that, I'm sorry.

**24-4-25 Susan Hedge - "Council's position is that no other approval is required."**

**Mr Ryan's dealt with that in his report"**

**SUSAN HEDGE**

Yes. Well, there is, if it assists. The current conditions as they are do not identify a required engineering solution. They are an indicative solution.

And then a RPEQ-designed solution is to be implemented.

Your Honour asked me at the last review about whether a further operational works approval or some other approval is required, and the Council's position is that no other approval is required.

Mr. Ryan's dealt with that in his report, so as to provide an expert opinion about that.

Could I make an amendment though to our conditions which is on page 12.

**28-4-25**

**Judge Williamson KC**

Yes.

**Susan Hedge**

**'the timing for 18A"**

Your Honour, we'll see timing right at the top of the page and that's the timing for 18A.

**Judge Williamson KC**

Yes.

**Susan Hedge**

**Hedge - "that's just by error there"**

And the part that's underlined, which reads, and after approval is obtained from council about stormwater drawings, that's just by error there. That inclusion should be in 18B, because 18A is about obtaining approval.

**Judge Williamson KC**

Ah right

**Susan Hedge**

**Hedge - "it doesn't make sense**

And so it doesn't make sense to obtain approval after you've obtained approval. So, in 18B, it should say timing prior to Council's notation on the plan of subdivision and after approval is obtained from Council about the stormwater drawings.



**28-4-25**      **Hedge - "This is a significant issue in this case"**

**Judge Williamson KC**

Right. So, that part of the note is deleted from 18A and removed to 18B

**Susan Hedge**

Yes, thank you. In 18B, under timing, there's actually two sentences that say the same thing. So, the second of those can be struck through.

**Susan Hedge**

That is an issue, a significant issue in the c

**Hedge - "This is a significant issue in this case"**

**Judge Williamson KC**

Yes

**Judge Williamson KC - "Yes"**

**Susan Hedge**

That is an issue, a significant issue in the c

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**Judge Williamson KC**

Yes

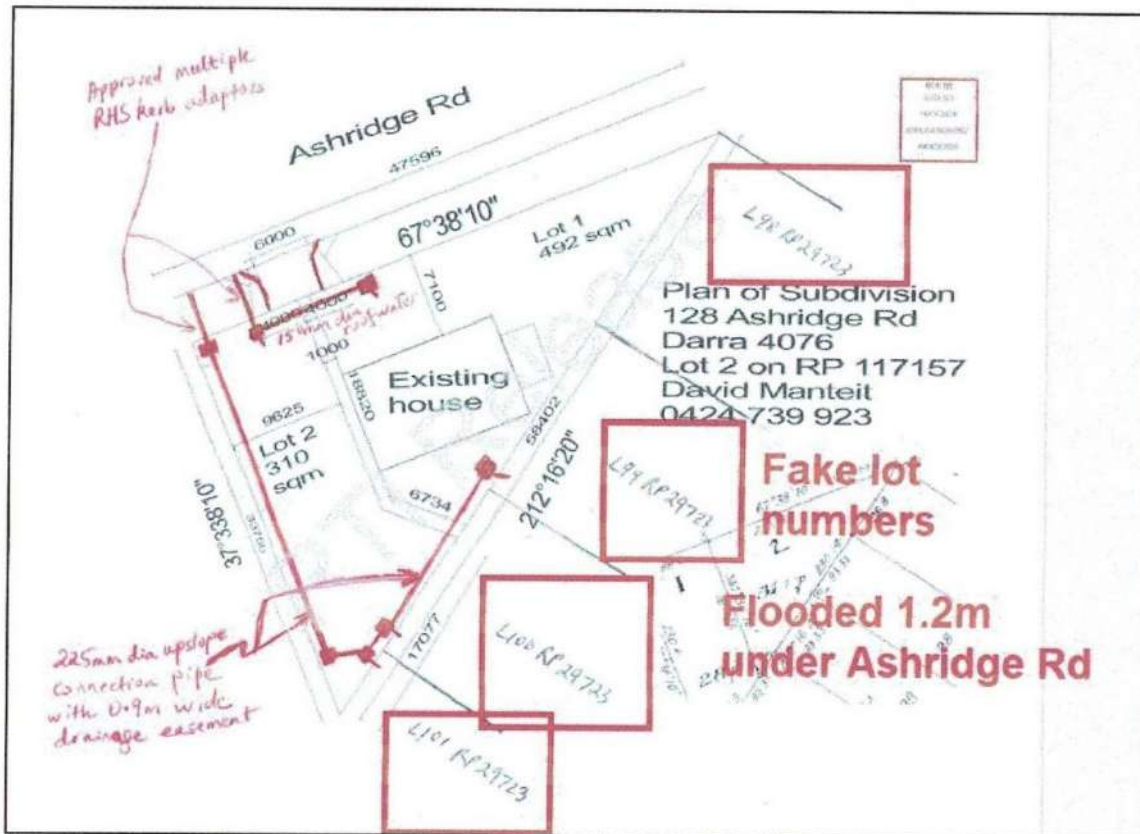
**Judge Williamson KC - "Yes"**

**Susan Hedge was correct about being a significant issue.**

**An issue for contempt of Court and a damages claim.**

# Flooded Council employee plan No. 1

From RTI records voluntarily provided by Brisbane City Council -



Above - Council employees flooded plan No. 1 - RTI records

Unlicensed Council employee preparation of an illegal flooded non - RPEQ certified **Upstream Drainage Plan** including -

- Flooded 1.2m in depth and >30 L/s velocity
- 60 metres of hydraulic pipes
- 4 pits
- 1 kerb adaptor

Unlicensed Council employee preparation of an illegal flooded non - RPEQ certified RPEQ **Onsite Drainage Plan** including -

- 15 metres of hydraulic pipes
- 2 pits
- 1 kerb adaptor



You (Freeman and Schrinner) instructed 7-10 Council licenced and unlicenced employees ("The Council employees") to prepare Upstream Drainage and Onsite Drainage.

The **Upstream Drainage** hydraulic plan was as per shown on the Brisbane City Council 41 pages of RTI ("RTI plan"). **This was prepared between 12/7/24 and 25/9/24, by the Council employees. This was a falsified plan with false lot numbers 98-101.**

## Law broken by Council employees - alleged fraud

It was prepared in order to allegedly deceive the applicant and the public of Brisbane.

The **Onsite Drainage** hydraulic plan was as per shown on the Brisbane City Council 41 pages of RTI ("RTI plan"). **This was prepared between 12/7/24 and 25/9/24, by the Council employees. This was a falsified plan with false lot numbers 98-101.**

## Law broken by Council employees - alleged fraud

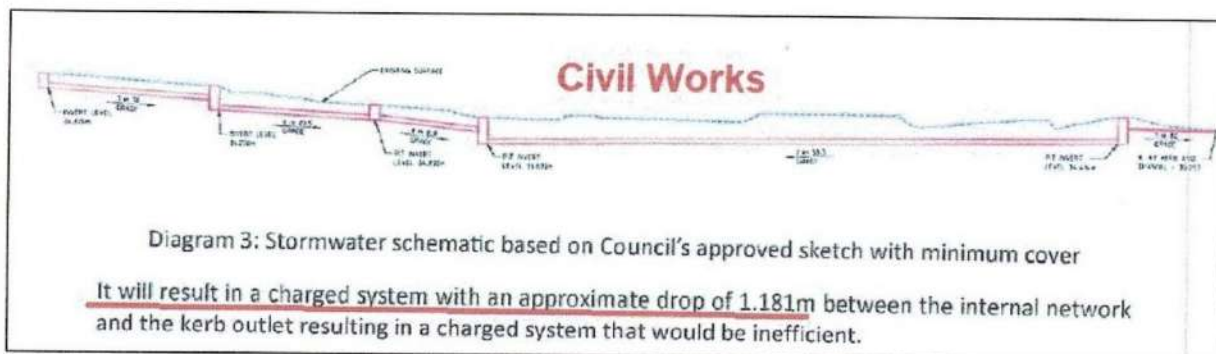
Both of these Onsite Drainage hydraulic plans were -

Designed and engineered by your unlicenced Council employees

## Upstream Drainage

**Flooded** - ended up 1.2 m below the Ashridge Rd kerb (as per your engineer witness you relied on).

**Flooded** - flow velocity of  $38 \times 2 = 76$  litres per second at the kerb ( $>30$  L/s) - as per Civil Works report date 76 litres per second. Agreed by Corrigan, Manteit and your barrister Hedge ("It doesn't work" - 24-4-25)



5) Corrigan confirmed that the Council employee non RPEQ certified plan approved Upstream Drainage red line is 1.2m under the Ashridge Rd kerb. and velocity >30 L/s at the kerb.

**Confirmed flooded by your barrister Susan Hedge, on 24-4-25, in Court.**

**You lied to the Court for 7 months.**

**Susan Hedge said on 31-1-25 this was "one way"**

Notations in red on approved plan

**31-1-25 Susan Hedge**

14. The notations identified in red on the Approved Plan:

**"Represent one way"**

(a) are administrative in nature (for example, the identification of the plan and drawing number); or

(b) as indicated, they are "indicative" only and represent one way, but not the only

**SUSAN HEDGE**

**24-4-25 Hedge "It won't work"**

Mr. Corrigan... So, the Civil Works Engineers report says that where the red line is, the indicative line on the plan, that that won't work.

**Hedge - "that won't work"**

**JUDGE WILLIAMSON**

Okay. Well there we go.

**Judge Williamson KC - "Well there we go "**

**SUSAN HEDGE**

That's Civil Works Engineers. That's the letter. Yes.

Mr. Corrigan agrees that where that red line is, like if you take a literal interpretation of what is in fact an indicative drawing, then that will not work. **"then that won't work"**

He's identified two other ways that you can achieve the outcome of the condition, which is to provide upslope drainage.

**Hedge - "He's identified two other ways that you can achieve the ....condition."**

**JUDGE WILLIAMSON**

Yep.



9.11.3. Civil Works Engineers then depicted Diagram 3 where correct ground cover was assumed and the conclusion made that the discharge level of the pipe accordingly would be lower than the kerb level in Ashridge Road. As stated above, I don't disagree with the levels shown by Civil Works Engineers. However, in my experience, a stormwater designing civil engineer would move to a design such as in my **Attachment D** which does achieve the necessary levels.

Corrigan confirmed that the unlicensed Council employee plan would end up 1.2m under the kerb. Any child over 8 years of age would have known that would happen as stated in the Notice of Appeal, by Manteit, that the pipes would end up 1.2m under the kerb.

**Are your unlicensed Council employees that dumb?**

**Seven months of being dumb?**

**Please advise why this is not dishonesty and unlicensed employee corruption.**

It had been advertised on [Brisbane City Council Complaints](#) since 10/10/24.

Any person over 8 years of age would have known the pipe ended 1.2m under the Ashridge Rd Kerb.

- Civil Works as per report dated 31/1/25
- David Manteit - the applicant, as per Notice of Appeal dated 19/11/24
- Susan Hedge barrister - Court hearing 24/4/25

SUSAN HEDGE

24-4-25 Hedge "It won't work"

Mr. Corrigan... So, the Civil Works Engineers report says that where the red line is, the indicative line on the plan, that that won't work.

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Hedge - "He's identified two other ways that  
you can achieve the ....condition."

JUDGE WILLIAMSON

Yep.



## Susan Hedge had cards

**22-4-25 Corrigan the goldfish - the discharge level of the pipe accordingly would be lower than the kerb.**

9.11.3. Civil Works Engineers then depicted Diagram 3 where correct ground cover was assumed and the conclusion made that the discharge level of the pipe accordingly would be lower than the kerb level in Ashridge Road. As stated above, I don't disagree with the levels shown by Civil Works Engineers. However, in my experience, a stormwater designing civil engineer would move to a design such as in my **Attachment D** which does achieve the necessary levels.

**Dumbo Byth Chambers barrister either couldn't work that out for 7 months or has lied for 7 months. It can only be one or the other.**

**Which one is it ? Please advise the ratepayers and the CCC.**

Your Lord Mayor paid your rates bills for this rubbish.

**In other words, Susan Hedge had lied for 7 months**

**"I have to put my cards on the table" - indicating previous alleged dishonesty of Hedge Freeman, Schrinner, Council and Council licenced and unlicenced employees, from 25/9/24 to 24/4/25 (7**

months).

Why did Schrinner and Freeman have cards? Why did you hold cards and what were the cards?

- Engineered by your licenced and unlicenced Council employees
- Non-RPEQ certified (illegal)

**Nobody asked for the Council to prepare these plans.** There is no dispute that these plans were flooded and drawn in an illegal kerb adaptor location.

**There was no request by David Manteit to provide Upstream Drainage plans to Council at any stage.**

There was design by you and your unlicenced Council employees, of some 81 metres of pipes, pits and kerb adaptor prepared by the licenced and unlicenced Council employees.

You, Council and the Council employees were found out.

The Upstream and Onsite drainage plans were unlawful and would have caused to be incurred fines by persons both designing and constructing these unlawful plans.

These plans, if followed will cause the applicant RPEQ, the applicant, and plumber to break up to 20 Council laws.

**S164** of the Planning Act meant that you and your Council employees would have caused fines of \$751,000 to be applied, if Manteit designs or builds the pipes which contravened the DA approval.

**S163** of the Planning Act meant that fines of \$750,000 apply if the owner constructs something that is not approved.

Council employees were **forcing any applicant RPEQ engineer to lose his licence** by designing flooded plans.

There was no process whereby the applicant RPEQ to change the plans or even know what the invert levels were for the pipes. As mentioned previously by Susan



Hedge in Court.

Hence, the applicant could not design nor construct the two Council flooded Upstream and Onsite drainage plans.

Hence, the applicant has incurred damages of around \$750,000.

### **Council employees used falsified lot numbers**

1) The Council employees intentionally concocted a non - RPEQ certified Upstream Drainage plan and a non- RPEQ certified Onsite Drainage plan with falsified lot numbers.

This alleged fraudulent action by the unlicensed Council employees to use fake/falsified lot numbers has never been disputed by Council.

**Law broken by Council employees-** Alleged fraud

## Upstream Drainage

### Council employees break laws

2) The Upstream Drainage plan by the Council employees has not been RPEQ certifies which contravenes S115 (1) (a), (b), (c), (d).

#### **Law broken by Council employees - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory Professional Conduct, for a registered professional engineer. (a) - (d)**

"unsatisfactory professional conduct" , for a registered professional engineer, includes the following—

- (a) conduct that is of a lesser standard than that which might reasonably be expected of the registered professional engineer by the public or the engineer's professional peers;
- (b) conduct that demonstrates incompetence, or a lack of adequate knowledge, skill, judgement or care, in the practice of engineering;
- (c) misconduct in a professional respect;
- (d) fraudulent or dishonest behaviour in the practice of engineering;
- (e) other improper or unethical conduct.

(a) conduct that is of a lesser standard than that which might reasonably be expected of the registered professional engineer by the public or the engineer's professional peers.

(b) conduct that demonstrates incompetence or lack of adequate knowledge, skill, judgement or care, in the practice of engineering.

(c ) Misconduct in a professional respect.

(d) Fraudulent or dishonest behaviour in the practice of engineering

(d) either improper or unethical conduct.

#### **Law broken by Council employees - Unlicensed engineering - S115 (1) of the Professional Engineers Act 2002**

##### **PROFESSIONAL ENGINEERS ACT 2002 - SECT 115**

Who may carry out professional engineering services

##### **115 Who may carry out professional engineering services**

- (1) A person who is not a practising professional engineer must not carry out professional engineering services.

*Penalty—*

Maximum penalty—1000 penalty units.

**Above - S115 (1) of the Professional Engineers Act.**



It is my allegation that the unlicenced Council employees have committed offences under all of the above.

Lord Mayor Schrinner and CEO Freeman have allegedly not taken action to stop this alleged corruption.

The Crime and Corruption Commission and the Board of Professional Engineers will decide to make their findings followed by the appropriate enforcement action.

### **Law broken by the Council employees - S115 (1) of the Professional Engineers Act 2002. Unlicenced engineering**

### **Law broken by Council employees - S15(1) of the CC Act 2001**

#### **CRIME AND CORRUPTION ACT 2001 - SECT 15**

##### **Meaning of corrupt conduct**

##### **15 Meaning of corrupt conduct**

(1)

"Corrupt conduct" means conduct of a person, regardless of whether the person holds or held an appointment, that—

(a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—

(i) a unit of public administration; or

(ii) a person holding an appointment; and

(b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that—

(i) is not honest or is not impartial; or

(ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or

(iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and

(c) would, if proved, be—

(i) a criminal offence; or

(ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.

### **3) Council employees intentionally and fraudulently used fake lot numbers. Lot 98-101. Lot 101 is behind a property two doors down the road.**

Schrinner, Freeman and Council employees and Susan Hedge have not disputed this fact, of this lot being behind another property, not the subject property.

**Law broken** - alleged Fraud, Queensland Police referral.

### **4) Stubs and Hydraulic pipes placed illegally in neighbour's yards without neighbour's permission.**



**7.6.5 Provision of drainage for future upslope development of a neighbouring property**

- (1) Provision must be made for the future orderly development of adjacent properties with respect to stormwater drainage where at least part of those upslope properties would drain through the development, or the most feasible location for stormwater drainage infrastructure to service those properties is within the development.
- (2) If a piped drainage connection is provided for up-slope development, the drainage infrastructure must fully extend to the boundary of the up-slope site to ensure that the up-slope property owner does not have to undertake works in the down-slope property to connect to this stormwater infrastructure.
- (3) Where a pipe is used to facilitate an up-slope stormwater connection (now or in future) the minimum pipe size is 225mm nominal diameter for any development. This stormwater pipe must be connected to a lawful point of discharge.
- (4) The development is to design any up-slope stormwater connection for fully developed catchment flows.

**Above - PSP S7.6.5 - states that the pipe is to extend to the boundary, not past the boundary.**

**Law broken by Council employees - PSP S7.6.5**

**Law broken by Council employees - Schedule 2 of the Professional Engineers Act 2002**

**Law broken by Council employees - S115 (1) of the Professional Engineers Act 2002**

**Law broken by Council employees - Allegedly a criminal offence of 2 years jail for trespass and destruction of neighbour's property**

**5) The Upstream Drainage plan is flooded by 1.2m under the Ashridge Rd kerb as stated by Civil Works and Corrigan.**

**Law broken by Council employees – Newton's Law of gravity - Upstream Drainage 1.2m under Ashridge Rd.**

**Law broken by Council employees - S 115 (1) of the Professional Engineers Act 2002**

**Law broken by Council employees - Schedule 2 of the Professional Engineer Act 2002**

**Law broken by Council employees- Corrupt conduct S15 (1) of the CC Act 2001 for both unlicensed engineering and incompetent engineering**

**Law broken by Council employees - Building Act 1975**



**Law broken by Council employees - PSP S 7.6.5** - would not drain through the development.

## 6) Nuisance flooding caused by Council employees will bring an action or claim for damages arising out of the nuisance.

### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
- (2) When land is developed, the roof and surface-water run-off from that land and any external catchment (through the development site) must be discharged to a lawful point of discharge, being:
  - (a) where the location of the discharge is under the lawful control of Council, being:
  - (b)
    - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
    - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.

### Law broken by Council employees - PSP S7.6.1 (1)

The flow of 76 litres per second at the kerb is greater than the lawful 30 litres per second. This will cause nuisance flooding to many properties in Darra, including the subject lot.

#### 5. Potential Downstream Flooding Issues

#### Civil Works

Understanding the lower elevations at the rear of the site due to the existing topography, any surcharging from the upstream drainage system could result in stormwater flowing toward adjacent downstream properties. This would in turn create nuisance flows, which contradicts the "No Worsening" principle of stormwater management upheld by Council.

In addition, an upstream connection does not prevent overland flow risks as the proposed infrastructure will only cater for minor flow storm events, as the primary issue for this development is the existing site terrain, which naturally directs water toward the rear.

#### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
- (2) When land is developed, the roof and surface-water run-off from that land and any external catchment (through the development site) must be discharged to a lawful point of discharge, being:
  - (a) where the location of the discharge is under the lawful control of Council, being:
    - (b) |
      - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
      - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.

**Law broken** - S 7.6.1 (2) - Council employees have not discharged to a lawful point of discharge.

**Law broken** - Newton's law of gravity, BSD 8111, 8113, S7.6.5.

**8) Discharge to kerb and channel for the development including any external catchment must be limited to 30 l/s.**

Flow velocity based on Civil Works based on conservative 60% roof cover

**Lot 98**

**Lot 99**

38 litres per second = > 30 l/s

38 litres per second = > 30 l/s

**Civil Works report 31-3-25**

Total flow t kerb - 38 litres per second \* 2 = **76 litres per second.**

This velocity is **greater than 30 litres/second.**

Catchment	Q <sub>1</sub> (m <sup>3</sup> /s)	Q <sub>2</sub> (m <sup>3</sup> /s)	Q <sub>5</sub> (m <sup>3</sup> /s)	Q <sub>10</sub> (m <sup>3</sup> /s)	Q <sub>20</sub> (m <sup>3</sup> /s)	Q <sub>50</sub> (m <sup>3</sup> /s)	Q <sub>100</sub> (m <sup>3</sup> /s)
Existing Site	0.014	0.019	0.026	0.031	0.038	0.049	0.054

**Civil Works report**



### 7.6.3.1 Connection to kerb and channel

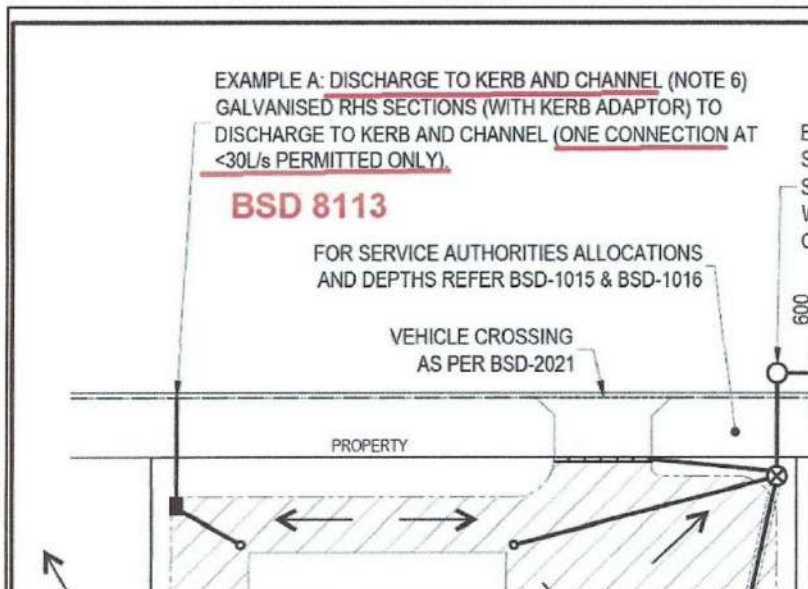
- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to BSD-8113).
- (3) Only approved full-height kerb adaptors, complying with [BSD-8114](#) are permitted. The kerb adaptors must be placed in a location where service pits on the footpath will not conflict with the future pipe location.
- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

**Law broken by Council employees** - PSP S7.6.3.1 (1) and PSP S7.6.3.1 (2).

### BSD 8111

6. THE PERMITTED TOTAL DISCHARGE FROM THE DEVELOPMENT TO KERB AND CHANNEL, INCLUDING CONTRIBUTION FROM ANY EXTERNAL CATCHMENT, MUST NOT EXCEED 30L/s.

**Law broken by Council employees** - BSD 8111



**Law broken** - BSD 8113

**NOTES: BSD 8111**

1. DESIGN FLOWS CALCULATED BASED ON MANNING'S 'n' OF 0.011. PIPE SIZED ASSUMING A DISCHARGE OF 15 L/s FROM EACH ALLOTMENT - BASED ON ROOF AREAS OF 250m<sup>2</sup> AND ARI OF 20 YEARS FOR S.E. QUEENSLAND. ALL PIPES SHALL HAVE A MINIMUM DIAMETER OF 150mm, EXCEPT ACROSS FOOTPATH.
2. WHERE THE PIPE GRADIENT EXCEEDS 5%, UNDERTAKE A MORE DETAILED HYDRAULIC ANALYSIS INCLUDING THE ASSESSMENT OF STRUCTURE LOSSES, WHERE APPROPRIATE.
3. AN EASEMENT IN FAVOUR OF COUNCIL IS REQUIRED WHEN THE ROOFWATER LINE IS DESIGNED TO SERVICE MORE THAN 2 ALLOTMENTS, IRRESPECTIVE OF PIPE SIZE.
4. DISCHARGE TO KERB AND CHANNEL MUST BE LIMITED TO 30L/s.

**Law broken by Council employees- BSD 8111**

**9) Pipe is flooded by 1.2m at the kerb. Therefore the pipe grade is more than .5%**

5. MINIMUM PIPE GRADES TO COMPLY GENERALLY WITH AS3500 NATIONAL PLUMBING AND DRAINAGE CODE PART 3 STORMWATER DRAINAGE:
  - 1.0% GRADE FOR PIPES ≤150 DIAMETER.
  - 0.5% GRADE FOR PIPES >150 BUT <375 DIAMETER.
  - 0.3% GRADE FOR PIPES ≥375 DIAMETER.

**BSD 8113****Law broken by Council employees - BSD 8113**

6. MINIMUM PIPE GRADES TO COMPLY GENERALLY WITH AS3500 NATIONAL PLUMBING AND DRAINAGE CODE PART 3 STORMWATER DRAINAGE:
  - 1.0% GRADE FOR PIPES ≤150Ø;
  - 0.5% GRADE FOR PIPES > 150Ø BUT < 375Ø;
  - 0.5-0.3% GRADE FOR PIPES 375Ø.

**BSD 8111****Law broken by Council employees - BSD 8111**

**DESIGN CRITERIA FOR REAR OF ALLOTMENT  
DRAINAGE SYSTEM**

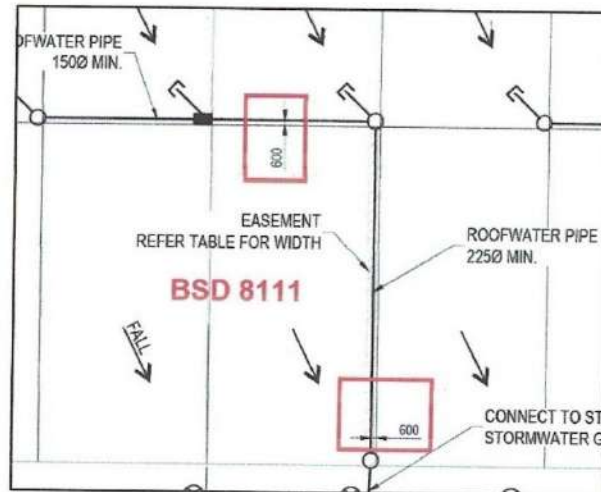
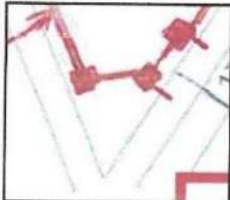
**BSD 8111**

EASEMENT WIDTH (m)	NOMINAL PIPE DIAMETER (mm)	MINIMUM PIPE SLOPE (%)	FLOW (L/s) - NOTE 4							
			PIPE GRADIENT % - NOTE 6							
			0.5	1.0	1.5	2.0	2.5	3.0	4.0	5.0
NOT REQUIRED - NOTE 3	150	1.0	N/A	18	23	26	30	33	38	42
0.9	225	0.5	38	56	67	78	87	96	110	125
0.9	300	0.5	84	120	146	170	190	210	N/A	N/A



# 11) Sham triangle at rear right.

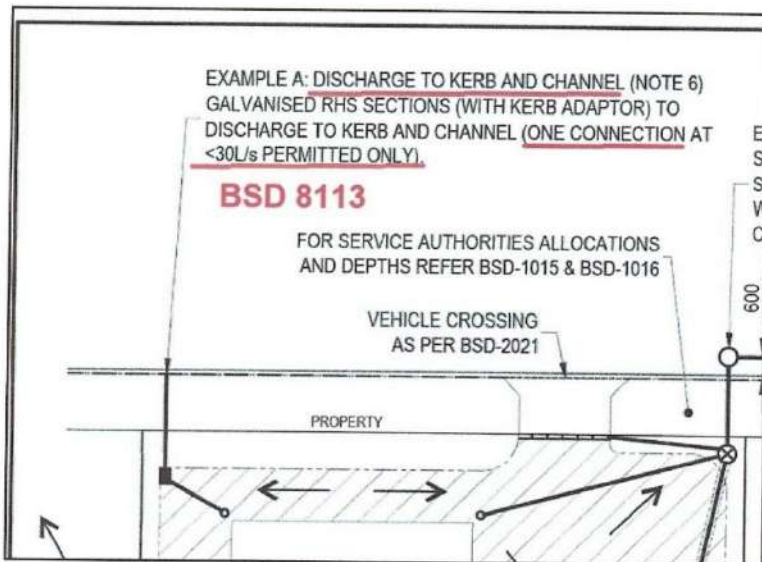
Placement of pipes by Council employees do not comply with Upstream Drainage pipe being more than 600mm from boundary, without owner consent.



Law broken by Council employees - BSD 8111

## Onsite drainage

11) Pipes do not comply with Onsite drainage kerb adaptor being placed more than 400mm - 600mm from the low side of the kerb.



**Law broken - BSD 8113**

**7.6.2 Roof water disposal in residential areas**

- (1) All lots that do not fall directly towards the road must be provided with a rear allotment roof-water drainage system. The inter-allotment drains should generally be placed in the allotments which they serve directly. This system is detailed in [BSD-8111](#) and [BSD-8112](#).
- (2) Roof-water drainage systems are classified as private drains with the responsibility for future maintenance lying with the property owners.
- (3) In local residential streets, an approved full height kerb adaptor must be provided in the kerb, 400mm from the projected low side boundary for each lot.
- (4) In streets where footpaths will be constructed, kerb adaptors as per above with a length of UPVC pipe (sewer class SN8) extended from the adaptor to beyond the concrete footpath are required as per [BSD-8114](#).
- (5) All roof-water pipes >150mm nominal diameter are to connect to a stormwater gully or maintenance hole.

**Law broken - PSP 7.6.2**

**Council employee plans would have forced applicant RPEQ engineer and contractor to commit offences.**

**Law broken by applicant - S163 Planning Act** - \$751,000 fine from Brisbane City Council to the applicant if Onsite Drainage is built to Council laws, and not the red lines.

**Law broken by applicant - S164 Planning Act** - \$751,000 fine from Brisbane City Council to the applicant if the Onsite Drainage is built to the red lines, which would be contrary to the DA approved plan in red.

There are fines to the applicant either way.

**Upstream drainage**

**12) Applicant private engineer would lose his licence for designing to the red lines, which are illegal, since they were flooded by 1.2m.**

**Law broken by applicant engineer** - Schedule 2 of the Professional Engineers Act 2002.

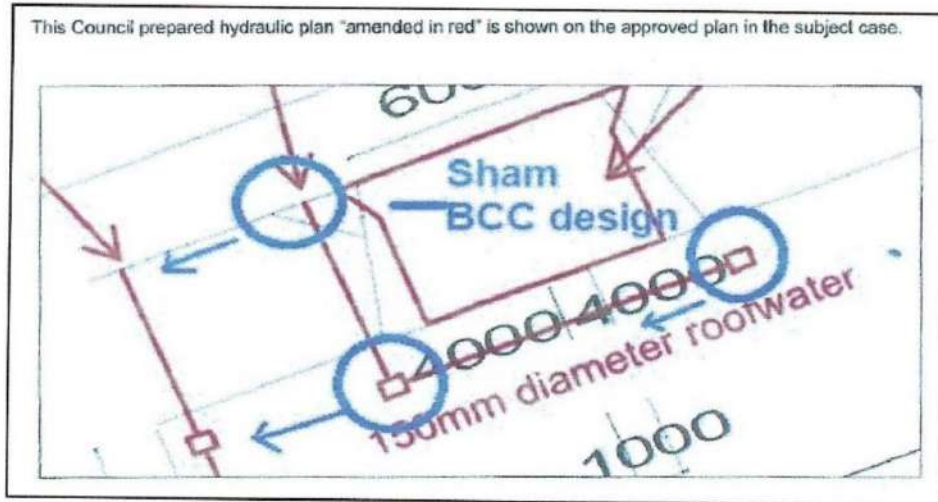
**Law broken by applicant engineer** - S164 fines apply to the hydraulic engineer of \$751,000 for illegal hydraulic designing not conforming to the DA approved plan.

**Plumber forced to lose his licence by building 1.2m under Ashridge Rd**

**Building Act 1975**



**Law broken by applicant plumber - S163 of Planning Act 2015** - fine by Council to the **applicant** of \$751,000 for building a pipe 1.2m under the kerb not approved.



**Above - Notice of appeal**

**12) Applicant Private engineer would lose his licence for designing kerb adaptor more than 400 - 600mm from the low side of the kerb.**

**Law broken by applicant engineer** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory conduct of a professional engineer.

**Law broken by applicant engineer** - PSP 7.6.2.3 (400 mm from low side)

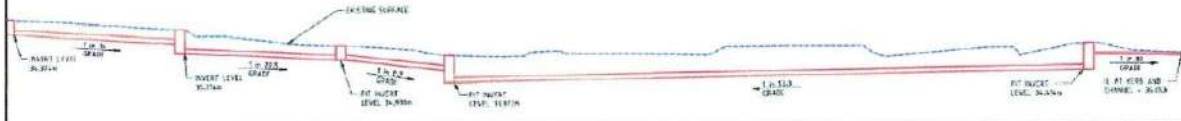
**Law broken by applicant engineer** - BSD 8111 (600 mm from low side)

**Law broken by applicant engineer** - BSD 8113

**Plumber forced by Council employees to lose his licence for not building to Council laws - kerb adaptor halfway up the kerb.**

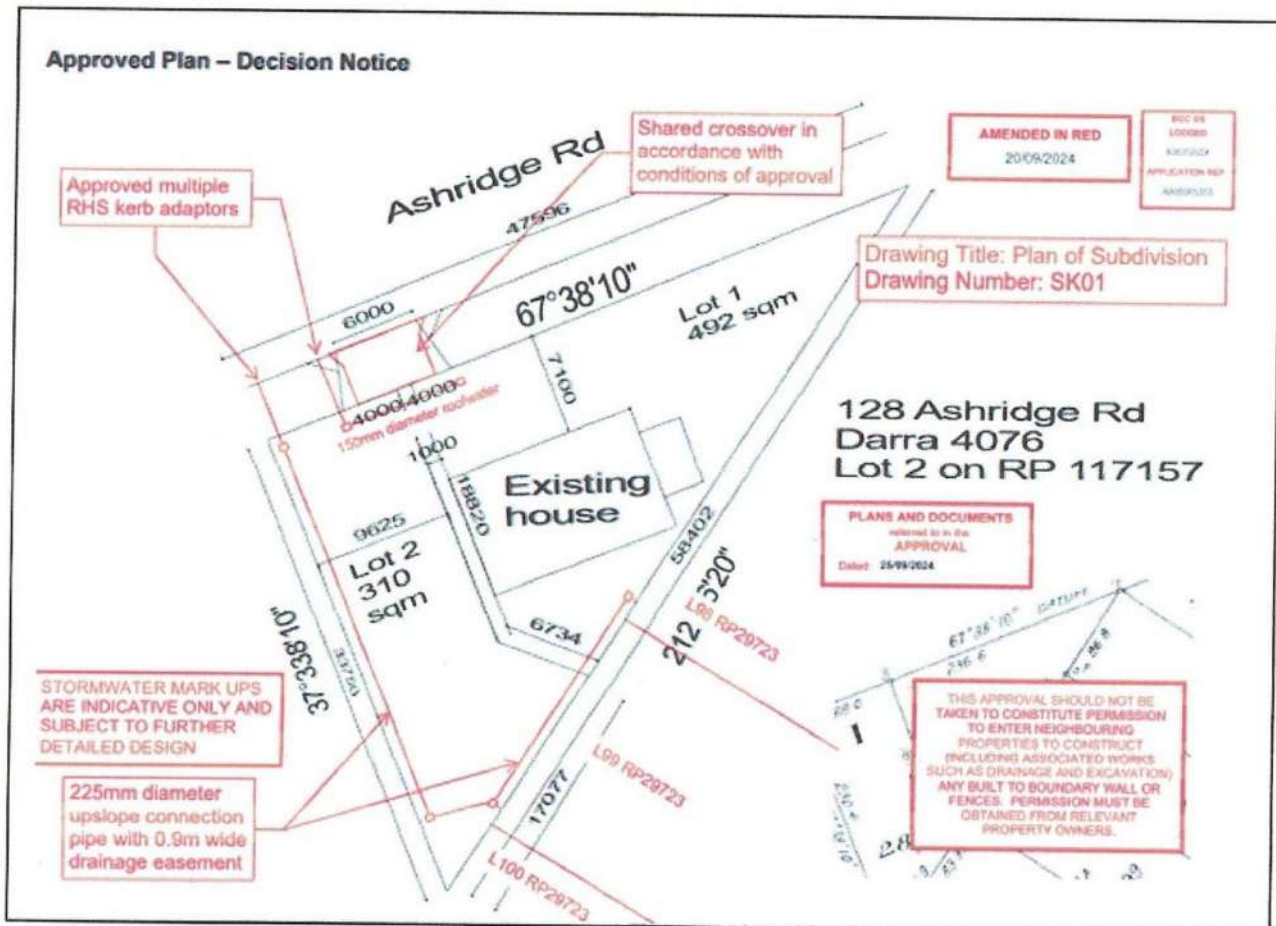
**Law broken** by applicant engineer - **S163 Planning Act** - fine by Council to the **applicant** of \$751,000 for building a pipe more than 400mm from the low side of the kerb.

## Council employee flooding plan by 1.2m Flood nuisance to Darra residents





## Flooded Council employee plan No. 2 - Approved plan 25/9/24.



DA approved plan 25/9/24

The unlicensed Council employees have intentionally contravened the following Council laws -

### Upstream Drainage

You (Freeman and Schrinner) or your Council proxies instructed 7-10 Council licenced and unlicensed employees ("The Council employees") to prepare the Upstream drainage plans that were illegal, broke many Council's own laws, and were flooded in both depth (1.2m) and velocity >30 L/s at the kerb.

If you did not instruct, who did?

There was design by you and your unlicensed Council employees, of some 61 metres of pipes, pits and kerb adaptor prepared by your licenced and unlicensed Council employees.

You, Council and your unlicensed Council employees were found out.

The Upstream drainage plans were unlawful and have would have caused Manteit fines of \$751,000 under S163 and S164 of the Planning Act 2016, by persons both designing and constructing these unlawful plans.

These plans, designed or constructed, will cause the applicant RPEQ, the applicant and plumber to break up to 23 Council laws.

The contravening of S164 of the Planning Act meant that you and your Council employees would have caused fines of \$751,000 to be applied, if Manteit designs or builds the pipes which were not matching the DA approval.

The contravening of S163 of the Planning Act 2016 meant that fines of \$751,000 apply if the owner constructs something that is not approved.

Council employees were forcing any applicant RPEQ engineer to lose his licence by designing flooded plans.

**There was no process whereby the applicant RPEQ could change the plans or even know what the invert levels were for the pipes. As mentioned previously by Susan Hedge in Court, on 29/4/25.**

**Susan Hedge**

And is your view that that timing for 18b that is the implementation of the certified stormwater drawings that occur prior to council's notation on the plan of subdivision and after the approval of the drawings. Is that a reasonable response to the planning scheme provisions that are relevant?

**Corrigan**

Yes, I think it's a reasonable response. I think it adds, the addition adds some clarity to ensure that the approval is obtained prior to those works being carried out.



**Judge Williamson KC**

And the part that's underlined, which reads, and after approval is obtained from council about stormwater drawings, that's just by error there. That inclusion should be in 18B, because 18A is about obtaining approval.

**Susan Hedge**

And so it doesn't make sense to obtain approval after you've obtained approval. So, in 18B, it should say timing prior to Council's notation on the plan of subdivision and after approval is obtained from Council about the stormwater drawings.

**Judge Williamson KC**

So, that part of the note is deleted from 18A and removed to 18B.

**Judge Williamson KC**

Yes, thank you. In 18B, under timing, there's actually two sentences that say the same thing. So, the second of those can be struck through.

**Susan Hedge<sup>1</sup>**

**Judge Williamson KC**

That is an issue, a significant issue in the case.

Susan Hedge forces Corrigan to admit that there is a problem with Council approval.

Susan Hedge forces Corrigan to admit that Manteit could not lodge any other plan to Council prior to constructing the flooded pipes (precis).

Thanks for the admittance of Council making it impossible for Manteit to lodge another plan, flooded or dry.

If it is reasonable now, for plans to be produced prior to construction, then how come it was not reasonable in the original Condition 18?

## **That fact alone has cost Manteit \$750,000, Lord Mayor Schrinner. Take note.**

Schrinner and Freeman knew this change in assessment coming months before the court case, but allegedly hid this until the day of the trial.

Freeman is the CEO. The change came on the day of the trial. Why? Why hide before?

Freeman is responsible for her unlicenced employees and corruption, says the Crime and Corruption Commission.

Your unlicenced Council employees refused to advise Manteit of the invert levels of the pipes, which meant that if the pipes were built one millimetre contravenes the red line, then Manteit would have incurred a fine of \$751,000 under S164 of the Planning Act 2016.

Hence, the applicant could not design nor construct the Council employee flooded Upstream Drainage plans, or in fact any other plan, since it would have contravened the DA approval, as per S164 of the Planning Act.

Hence, the applicant has incurred damages of around \$750,000, due to your unlicenced Council employees and your insistence on holding onto your system of refusing to allow the owner to make a change to the DA approved plans.

### **Council employees broken laws**

**1) The Upstream Drainage plan by the licenced and unlicenced Council employees has not been RPEQ certified, which is therefore unlicenced hydraulic engineering.**

**Law broken by the Council employees- S115 (1) of the Professional Engineers Act 2002** - unlicenced engineering

**Law broken by the Council employees - Schedule 2 (a) - (d) of the Professional Engineers Act 2001** Unsatisfactory professional conduct, for a



registered professional engineer.

"unsatisfactory professional conduct", for a registered professional engineer, includes the following—

- (a) conduct that is of a lesser standard than that which might reasonably be expected of the registered professional engineer by the public or the engineer's professional peers;
- (b) conduct that demonstrates incompetence, or a lack of adequate knowledge, skill, judgement or care, in the practice of engineering;
- (c) misconduct in a professional respect;
- (d) fraudulent or dishonest behaviour in the practice of engineering;
- (e) other improper or unethical conduct.

### **Above - Schedule 2 of the Professional Engineers Act 2002.**

(a) conduct that is of a lesser standard than that which might reasonably be expected of the registered professional engineer by the public or the engineer's professional peers.

(b) conduct that demonstrates incompetence or lack of adequate knowledge, skill, judgement or care, in the practice of engineering.

(c) Misconduct in a professional respect.

(d) Fraudulent or dishonest behaviour in the practice of engineering

(d) either improper or unethical conduct.

### **Law broken by Council employees - Schedule 2 of the Professional Engineers Act 2002.**

#### **PROFESSIONAL ENGINEERS ACT 2002 - SECT 115**

Who may carry out professional engineering services

#### **115 Who may carry out professional engineering services**

(1) A person who is not a practising professional engineer must not carry out professional engineering services.

*Penalty—*

Maximum penalty—1000 penalty units.

### **Above - S115 (1) of the Professional Engineers Act.**

It is my belief that the unlicensed Council employees have committed offences under all of the above.

**The approximate penalty to each Council employee is a maximum of around 1,000\*161.30 = \$161,300.**





Flooded - ended up 1.2 m below the Ashridge Rd kerb (as per Corrigan your engineer witness you relied on).

Flooded - flow velocity of  $38 \times 2 = 76$  litres per second at the kerb ( $>30$  L/s) - as per Civil Works report filed 31 March 25. 76 litres per second. Agreed by Manteit, Civil Works, Corrigan, Susan Hedge Council barrister.

The estimated depth of 1.2m under the Ashridge Rd kerb is undisputed by -

- Your own winemaster witness - Corrigan, as per his report dated 22-4-25.
- Civil Works as per report dated 31/1/25
- David Manteit - the applicant, as per Notice of Appeal dated 19/11/24
- Susan Hedge barrister - Court hearing 24/4/25

"I have to put my cards on the table" - indicating previous alleged dishonesty of Susan Hedge, Freeman, Schrinner, Council and Council licenced and unlicenced employees, from 25/9/24 to 24/4/25 (7 months).

## Dumbo Susan Hedge - "It won't work."

It was designed, prepared and engineered by your licenced and unlicenced Council employees

It was Non-RPEQ certified (illegal).

The hydraulic plans were the only plans designed, engineered and drawn in red, with conditions reflecting red lines, by Council employees, of 412 approved cases, for the calendar year 2024.

Nobody asked for the Council to prepare these plans. There is no dispute that these plans were flooded.

Laws broken by Council employees - a tiny list here. More to follow.

**Law broken by Council employees** - Law of gravity - Upstream Drainage 1.2m under Ashridge Rd.

**Law broken by Council employees** - S 115 (1) of the Professional Engineers Act

2002

**Law broken by Council employees** - Schedule 2 of the Professional Engineer Act 2002. Unsatisfactory Conduct of a registered professional engineer

**Law broken by Council employees** - Alleged Corrupt conduct S15 (1) of the CC Act 2001 for both unlicensed engineering and incompetent engineering

**Law broken by Council employees** - Building Act 1975

**Law broken by Council employees** - PSP S 7.6.5 - would not drain through the development.

**Law broken by Council employees** - S7.6.3.1 (2) flow velocity >30 L/s

Other laws broken here -

### 3) Nuisance flooding caused by Council employees will bring an action or claim for damages arising out of the nuisance.

#### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
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  - (a) where the location of the discharge is under the lawful control of Council, being:
    - (b)
      - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
      - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.

**Law broken by Council employees** - PSP S7.6.1 (1)

### 4) The development site is not discharged to a lawful point of discharge



#### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
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    - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
    - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.

There is either no lawful discharge of stormwater from the rear lots, therefore the rear lot owners must build a pipe through all their backyards somewhere else, if they want to develop their own site.

**Law broken by Council employees - S 7.6.1 (2)** - Council employees have not discharged to a lawful point of discharge.

**Law broken by Council employees - the law of gravity**

**5) Discharge to kerb and channel for the development including any external catchment must be limited to 30 l/s.**

Flow velocity at kerb based on Civil Works conservative 60% site cover = roof cover  
Note that Town Planning Small Lot Code roof cover is up to 90% of the site. See elsewhere for Town Planning interpretation.

**Lot 98****Lot 99**

38 litres per second = &gt; 30 l/s

38 litres per second = &gt; 30 l/s

**Civil Works report 31-3-25**

Catchment	Q <sub>1</sub> (m <sup>3</sup> /s)	Q <sub>2</sub> (m <sup>3</sup> /s)	Q <sub>5</sub> (m <sup>3</sup> /s)	Q <sub>10</sub> (m <sup>3</sup> /s)	Q <sub>20</sub> (m <sup>3</sup> /s)	Q <sub>50</sub> (m <sup>3</sup> /s)	Q <sub>100</sub> (m <sup>3</sup> /s)
Existing Site	0.014	0.019	0.026	0.031	0.038	0.049	0.054

**7.6.3.1 Connection to kerb and channel**

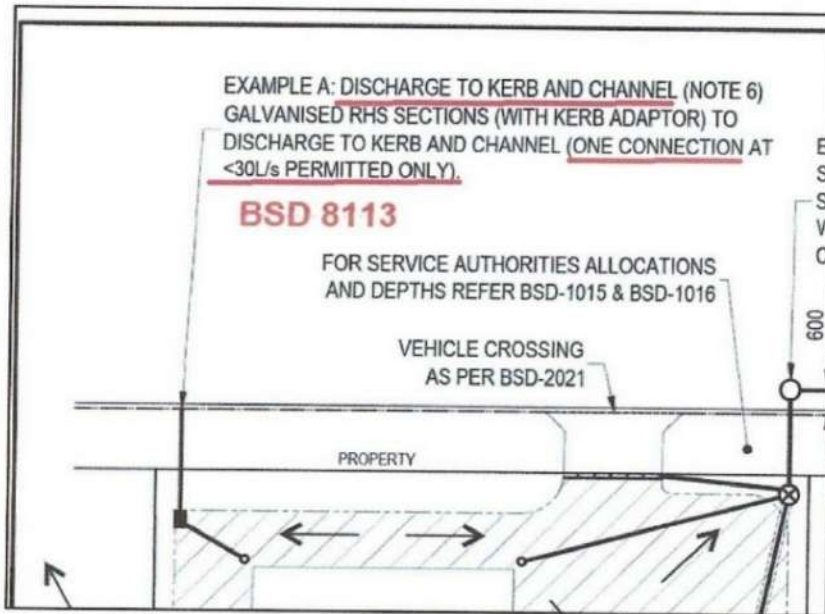
- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to BSD-8113).
- (3) Only approved full-height kerb adaptors, complying with [BSD-8114](#) are permitted. The kerb adaptors must be placed in a location where service pits on the footpath will not conflict with the future pipe location.
- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

**Law broken by Council employees** - PSP S7.6.3.1 (1) and PSP S7.6.3.1 (2).**BSD 8111**

6. THE PERMITTED TOTAL DISCHARGE FROM THE DEVELOPMENT TO KERB AND CHANNEL, INCLUDING CONTRIBUTION FROM ANY EXTERNAL CATCHMENT, MUST NOT EXCEED 30L/s.

**Law broken by Council employees** - BSD 8111





**Law broken - BSD 8113**

**NOTES: BSD 8111**

1. DESIGN FLOWS CALCULATED BASED ON MANNING'S 'n' OF 0.011. PIPE SIZED ASSUMING A DISCHARGE OF 15 L/s FROM EACH ALLOTMENT - BASED ON ROOF AREAS OF 250m<sup>2</sup> AND ARI OF 20 YEARS FOR S.E. QUEENSLAND. ALL PIPES SHALL HAVE A MINIMUM DIAMETER OF 150mm, EXCEPT ACROSS FOOTPATH.
2. WHERE THE PIPE GRADIENT EXCEEDS 5%, UNDERTAKE A MORE DETAILED HYDRAULIC ANALYSIS INCLUDING THE ASSESSMENT OF STRUCTURE LOSSES, WHERE APPROPRIATE.
3. AN EASEMENT IN FAVOUR OF COUNCIL IS REQUIRED WHEN THE ROOFWATER LINE IS DESIGNED TO SERVICE MORE THAN 2 ALLOTMENTS, IRRESPECTIVE OF PIPE SIZE.
4. DISCHARGE TO KERB AND CHANNEL MUST BE LIMITED TO 30L/s.

**Law broken - BSD 8111**

**6) The Council employees Upstream drainage pipe pipe grade is less than .5% (charged, going uphill).**

5. MINIMUM PIPE GRADES TO COMPLY GENERALLY WITH AS3500 NATIONAL PLUMBING AND DRAINAGE CODE PART 3 STORMWATER DRAINAGE:
  - 1.0% GRADE FOR PIPES ≤150 DIAMETER.
  - 0.5% GRADE FOR PIPES >150 BUT <375 DIAMETER.
  - 0.3% GRADE FOR PIPES ≥375 DIAMETER.

**BSD 8113**

**Law broken - BSD 8113**

6. MINIMUM PIPE GRADES TO COMPLY GENERALLY WITH AS3500 NATIONAL PLUMBING AND DRAINAGE CODE PART 3 STORMWATER DRAINAGE:

- 1.0% GRADE FOR PIPES  $\leq 150\emptyset$ ;
- 0.5% GRADE FOR PIPES  $> 150\emptyset$  BUT  $< 375\emptyset$ .
- 0.5-0.3% GRADE FOR PIPES  $375\emptyset$ .

**BSD 8111**

**Law broken by Council employees - BSD 8111**

**DESIGN CRITERIA FOR REAR OF ALLOTMENT  
DRAINAGE SYSTEM**

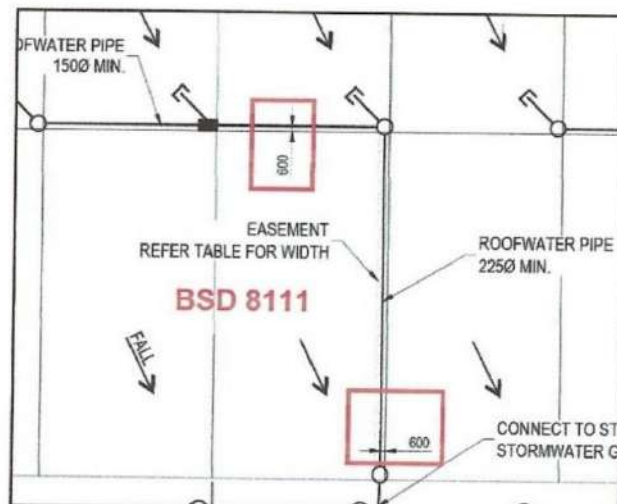
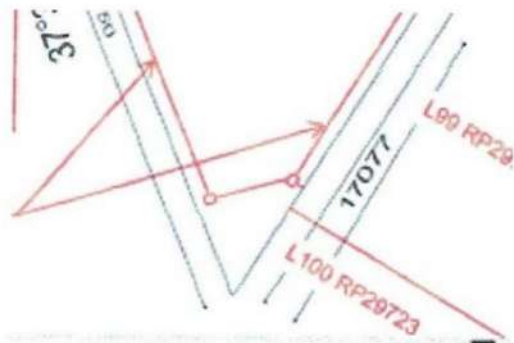
**BSD 8111**

EASEMENT WIDTH (m)	NOMINAL PIPE DIAMETER (mm)	MINIMUM PIPE SLOPE (%)	FLOW (L/s) - NOTE 4							
			PIPE GRADIENT % - NOTE 6							
			0.5	1.0	1.5	2.0	2.5	3.0	4.0	5.0
NOT REQUIRED - NOTE 3	150	1.0	N/A	18	23	26	30	33	38	42
0.9	225	0.5	38	56	67	78	87	96	110	125
0.9	300	0.5	84	120	146	170	190	210	N/A	N/A

**Law broken - BSD 8111**

**7) Does not comply with Upstream Drainage pipe being more than 600mm from boundary, without owner consent.**

**Sham triangle**



**Law broken - BSD 8111**

Ratified by Henderson V Brisbane City Council 4139/18 and a 3 approved S81 applications in 2024.



## Onsite drainage

You (Freeman and Schrinner) or (your proxies) instructed 7-10 Council licenced and unlicenced employees ("The Council employees") to prepare the Onsite drainage plans that were illegal, broke many Council laws, and were flooded.

There was design by you and your Council employees, of some 15 metres of pipes, pits and kerb adaptor prepared by the licenced and unlicenced Council employees.

You and the Council employees refused to remove the Onsite Drainage red lines for 7 months, from 25-9-24 to 28-4-25.

You, Council and the unlicenced Council employees were found out.

You were found out by your shonky witness and your barrister.

You are responsible for your corrupt employees actions.

**The Onsite drainage plans were unlawful** and would have caused to be incurred fines by persons both designing and constructing these unlawful plans, of up to \$751,000 per person, under S163 and S164 of the Planning Act 2016.

These Onsite Drainage plans, if designed and constructed, will cause the applicant RPEQ, the applicant, and plumber to break up to 23 Council laws.

S164 of the Planning Act meant that you and your unlicenced Council employees would have caused fines of \$751,000 to be applied, if Manteit designs or builds the pipes which contravened the DA approval.

S163 of the Planning Act meant that fines of \$750,000 apply if the owner constructs something that is not approved.

Council employees were forcing any applicant RPEQ engineer to lose his licence by designing flooded plans.

**There was no process whereby the applicant RPEQ could change the plans or even know what the invert levels were for the pipes. As mentioned previously by Susan Hedge in Court.**

**Susan Hedge forced Corrigan to admit this problem, in Court and change the requirement to loge RPEQ plans prior to construction.**

**That fact alone has cost me \$750,000 in damages.**

Hence, the applicant could not design nor construct the two Council flooded Upstream Drainage plans, or any other plans.

Hence, you, Council and the Council employees have caused losses to Manteit of \$751,000.

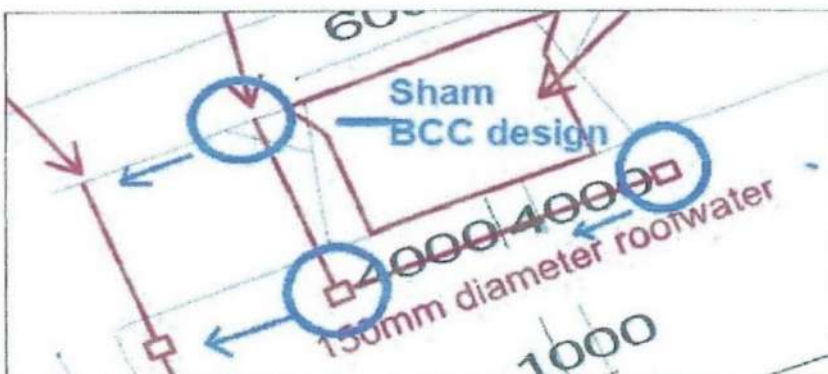
**8) The Council employee kerb adaptor was placed 5.1m from the low side of the kerb, by your Council employees and does not comply with BSD 8111, PSP 7.6.2, being more than what the law provides, being 400mm - 600mm from the low side of the kerb.**

Why did you and Council design and approve a plan, which placed the kerb adaptor halfway up the hill at AHD 35.463, instead of 400mm from the low side of the kerb at AHD 35.083 ?

You or the Council employees didn't bother to remove the Onsite Drainage red lines, indicating your alleged vindictive methods to destroy the applicant's livelihood and ability to seal the subdivision plan for for 7 months.

The Onsite Drainage plan was designed and engineered by your licenced and unlicenced Council employees.

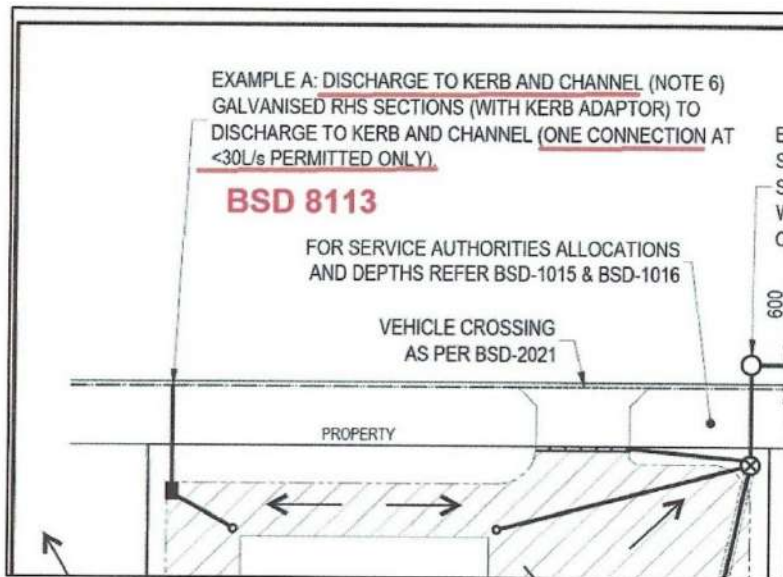
You allegedly chose for 7 months to attempt to protect your own reputation and the possible imprisonment of your alleged corrupted Council employees.





Above - Unlicensed Council employee alleged sham Onsite Drainage plan, forcing the owner and applicant RPEQ \$751,000 in fines by S163 and S164 of the Planning Act, if designed or constructed.

It's the only one of it's kind in 412 approved Council cases in 2024. Why?



### Law broken by Council employees - BSD 8113

#### 7.6.2 Roof water disposal in residential areas

- (1) All lots that do not fall directly towards the road must be provided with a rear allotment roof-water drainage system. The inter-allotment drains should generally be placed in the allotments which they serve directly. This system is detailed in [BSD-8111](#) and [BSD-8112](#).
- (2) Roof-water drainage systems are classified as private drains with the responsibility for future maintenance lying with the property owners.
- (3) In local residential streets, an approved full height kerb adaptor must be provided in the kerb, 400mm from the projected low side boundary for each lot.
- (4) In streets where footpaths will be constructed, kerb adaptors as per above with a length of UPVC pipe (sewer class SN8) extended from the adaptor to beyond the concrete footpath are required as per [BSD-8114](#).
- (5) All roof-water pipes >150mm nominal diameter are to connect to a stormwater gully or maintenance hole.

### Law broken by Council employees - PSP 7.6.2

**Law broken by Council employees - S164 Planning Act** - \$751,000 fine from Council to applicant if Onsite Drainage is built to Council laws, and not the red lines, being built 400mm from the low side of the kerb and not the red lines.

**Law broken by Council employees - S163 Planning \$751,000 fine** by Council to applicant if Onsite Drainage is built to the red lines, and not being 400m from the low side of the kerb.

## Offences committed by the RPEQ engineer if pipes designed or built.

### Upstream drainage

**12) Applicant RPEQ engineer would lose his licence for designing to the red lines, and conditions, which are illegal since they were flooded by 1.2m.**

**Law broken by applicant engineer** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, that of a registered professional engineer.

**Law broken by applicant engineer** - Planning Act S164 fines apply to the hydraulic engineer of \$751,000 for illegal hydraulic designing, of departing from the DA approved plan.

**Law broken by applicant engineer** - Planning Act S163 fines apply to the hydraulic engineer of \$751,000 for illegal hydraulic designing, of designing or building without approval.

#### **163 Carrying out assessable development without permit**

- (1) A person must not carry out assessable development, unless all necessary development permits are in effect for the development.

Maximum penalty—

- (a) if the assessable development is on a Queensland heritage place or local heritage place—17,000 penalty units; or
- (b) otherwise—4,500 penalty units. **\$751,000 fine**

- (2) However, subsection (1) does not apply to development carried out—

- (a) under section 29(10)(a); or
- (b) in accordance with an exemption certificate under section 46; or
- (c) under section 88(3).

#### **164 Compliance with development approval**

A person must not contravene a development approval.

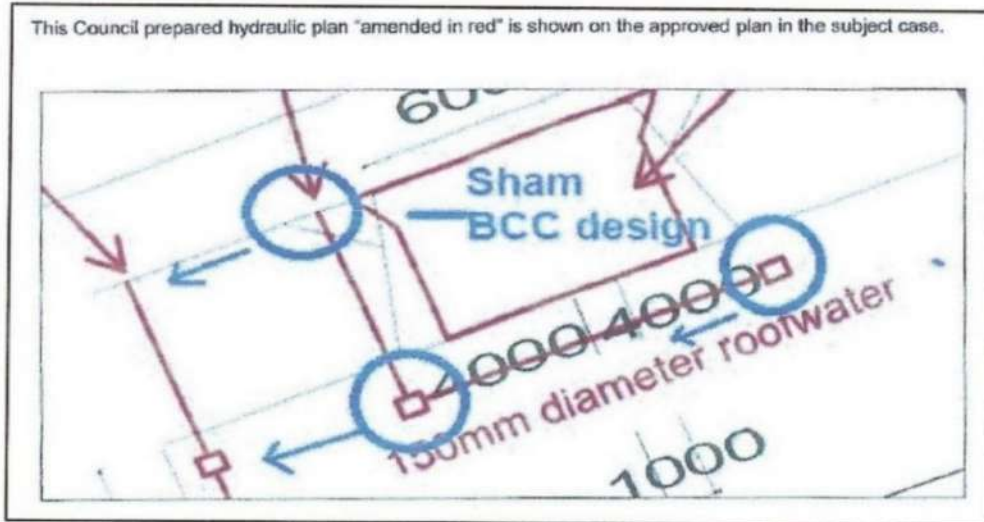
Maximum penalty—4,500 penalty units **\$751,000 fine**

**Plumber forced to lose his licence by building pipe 1.2m under Ashridge Rd**



## Building Act 1975

**Law broken by Plumber - S164 of Planning Act 2016** - fine by Council to the applicant of \$751,000 for building a pipe 1.2m under the kerb and by contravening the DA approved plan.



## Notice of Appeal

**12) Applicant Private engineer would lose his licence for designing the kerb adaptor more than 400 - 600mm from the low side of the kerb.**

The applicant hydraulic engineer, Civil Works has already provided a lawful design that complies with Council laws and the laws of gravity, being 400mm from the low side of the kerb. Filed 31/3/25.

**Law broken by applicant engineer** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory conduct of a professional engineer.

**Law broken by applicant engineer** - S163 of the Planning Act 2016, fines apply to the hydraulic engineer of \$751,000 for illegal hydraulic designing.

**Plumber forced by Council employees to lose his licence for not building to Council laws - kerb adaptor 5.1m up the kerb.**

**Law broken by applicant plumber** - S163 Planning Act - fine by Council to the applicant of \$751,000 for building a pipe more than 400mm from the low side of the kerb.

#### 14) Council easement forces house to be demolished.



**Dr Freeman supplied this document in the S232 Certificate.**

#### **Dr Freeman uses unlawful document in affidavit. Why?**

This document shows that it is impossible to run a pipe within an easement of 900mm behind the house. The house will need to be demolished.

It is also alleged that Dr Freeman has used an illegal document since the lawful ground levels are Contours 2002.

It is stated by myself that the levels of the ground have not changed since 2002.

On that grounds, the evidence of Freeman is alleged misleading and invalid and a retrial is necessary.

#### **Why did Freeman use a document that is not in the City Plan?**

**Freema supplies one unlawful contour plan and one legal document that contradict each other. Freeman contradicts herself in the same document. Why?**



<p>Ground level</p> <p><b>Freeman S232</b></p>	<p>Ground level means—</p> <ol style="list-style-type: none"> <li>the <u>level of the natural ground</u>; or</li> <li>if the <u>level of the natural ground</u> has changed, the level lawfully changed.</li> </ol> <p>Editor's note—Section 1.7.5 provides that for the purpose of the definition of ground level in Schedule 1, the level of the natural ground is deemed to have been lawfully changed if the level of the natural ground level is the prescribed level.</p>
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<p>Prescribed level</p> <p><b>Freeman 232 provided on 24-4-25 in contempt of Court order</b></p>	<p>The level of the surface of the land:</p> <ol style="list-style-type: none"> <li>existing at the time the original estate was subdivided and roads created through the estate as determined by a registered surveyor under the <i>Surveyors Act 2003</i> using best available evidence which is based on: <ol style="list-style-type: none"> <li>the 'as constructed' drawings for the subdivision of the original estate lodged with the Council; or</li> <li>if <u>paragraph (a)(i) does not apply, the 2002 contours of the Council's mapping system</u>; or</li> </ol> </li> <li>that is the result of operational work carried out as a consequence of a material change of use or reconfiguring a lot, if: <ol style="list-style-type: none"> <li>the material change of use or reconfiguring a lot was assessable development under the Council's planning scheme in effect between 1 January 2002 and the commencement of this planning scheme; and</li> <li>the operational work accords with the following: <ol style="list-style-type: none"> <li>the development approval for the material change of use or reconfiguring a lot;</li> <li>the development approval which approved the operational work.</li> </ol> </li> </ol> </li> </ol> <p>Editor's note—Section 1.7.5 provides that for the purpose of the definition of ground level in Schedule 1, the level of the natural ground is deemed to have been lawfully changed if the level of the natural ground level is the prescribed level.</p>
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**Forcing of demolition of house by Corrigan - forcing owner to demolish house - S163 Planning Act.**

## Flooded Council plan No. 3 - Corrigan

**Corrigan** 29/4/25 - a master plan is for the whole of a very large catchment.

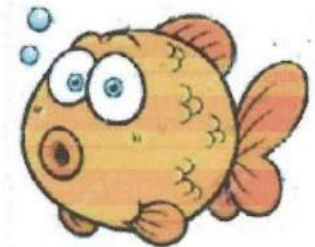
A master plan normally is for the whole of a very large catchment.

I mean, there may well be, well, there is a master plan for the whole of the Darra area, but it's a high-level master plan model. In fact, all of Brisbane's got a high-level master plan model.

But it doesn't, it's not used in this context where we're looking at the specific solution to drainage of upstream lots with a future development.

**Corrigan states its not used in this context.**

You (Schrinner and Freeman) or your proxies instructed the incompetent Corrigan (you relied on) to design, engineer and prepare, for Court evidence, two more flooded hydraulic plans breaking 23 Council laws.



In addition Corrigan promoted two further flooded plans.

It is simply impossible to build the hydraulic pipes that all end up under Ashridge Rd.

Corrigan was found out by David Manteit.

You (Freeman and Schrinner) and Council were found out yet again.

The proven intentional incompetence by your witness Corrigan is astounding and alleged to be fraudulent.

Why would you instruct someone to provide plans that causes the breaking of so many Council laws? You allegedly specifically ordered this allegedly incompetent allegedly fraudulent corrupt witness report to fool Judge Williamson KC and the public.

The discussion of the fake formula falsified report soaked up time in Court.

**Susan Hedge - "you said this is one solution". "This is one solution to convey stormwater from lots 97, 98 and 99 to Ashridge Rd"**

**Susan Hedge**

**"page 60, you said this was one solution**

**28-4-25**

When you were describing what is page 60, you said this is one solution. Do you know of other solutions? Just before you answer that, I might come back one step. This is one solution to convey stormwater from lots 97, 98 and 99 to Asgridge Road?



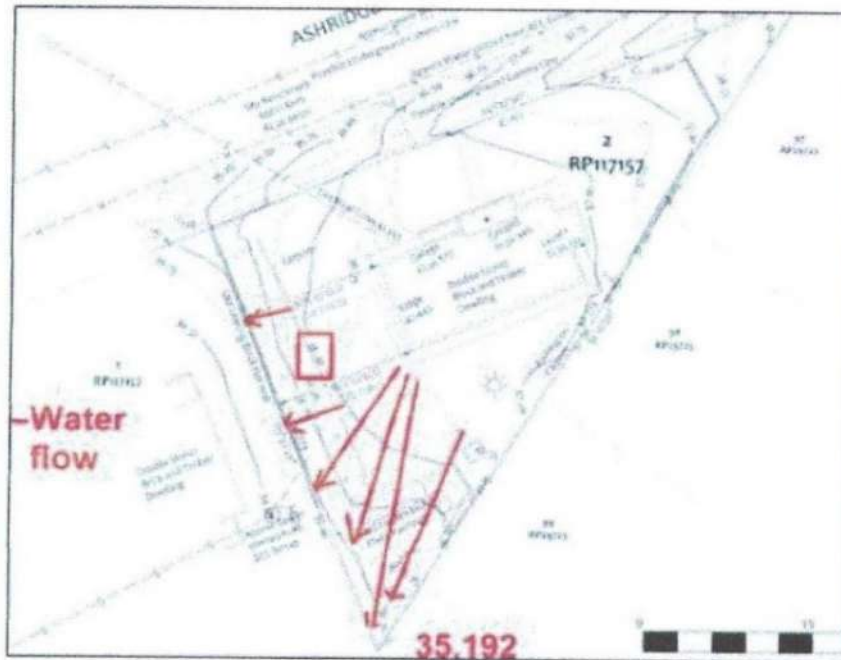
Susan Hedge made it quite clear that this "IS" one solution, not a possible solution.

5. THE DEVELOPMENT APPLICATION				
<u>The Application</u>				
5.1. The documents that I considered that are part of the application were as follows.				
#	Title	Pages	Date	Comment
1	Assessment Report by Applicant titled "Town Planning Application"	9	14May24	Council stamp dated 10July24 Contains plan of subdivided lots (page 9)

2	Affidavit by Applicant	49 Cover page plus 48 pages	19Nov24	<p>Commentary by Applicant on the Lawful Point of Discharge and issues of provision of stormwater infrastructure.</p> <p>Page 12 includes a design of the pad for the proposed dwelling with levels and arrows denoting stormwater runoff.</p> <p>Page 27 depicts existing ground contours. This diagram is a portion of the <u>survey plan included above in paragraph 4.5.</u></p>
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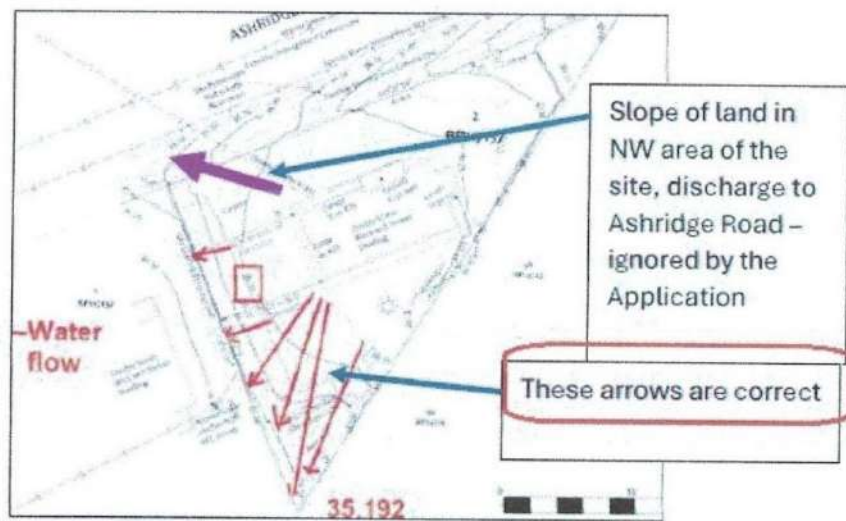
**Corrigan considered ONF survey plan as part of his assessment.**

2) Surveyor's contours.



Corrigan stated he considered the survey plan provided by David Manteit on 12-7-25.

2) Surveyor's contours.



The accused corrupted unlicensed Council employees never read the survey plan provided on 12-7-25.

### Laws broken by Corrigan - alleged fraud

Here is the proof that Corrigan attempted to "pass off" his report as "better" than his engineering peers.



Corrigan was so proud that he did 3 zeros. The goldfish engineer was paid by your rates money. Why use ? To stretch out the trial hearing?



### Corrigan is very proud of three zeros. 24-4-25

Some engineers would record that as just the two decimal places I happen to do it to three there. Anyway, it says IL 36.625, and then that pipe has a fall on it to the stub that joins the stub to lot 99, and there's an arrow pointing there and the IL is at 35.39. So there's a full... These levels are expressed as a... as what's known as a reduced level.

"Some engineers would record that as just the two decimal places."

## So what's this, Corrigan?

### Susan Hedge has zero idea of why the winemaster uses zeros all over the place.

Upstream pit				
Pit	IL	SL	Depth	
Stub Lot 97	36.625 <b>3</b>	37.3 <b>1</b>	0.675 <b>3</b>	
Stub Lot 98	36.325 <b>3</b>	37.0 <b>1</b>	0.675 <b>1</b>	
Stub Lot 99	35.39 <b>2</b>	36.0 <b>1</b>	0.6 <b>1</b>	
4	35.36 <b>2</b>	36.0 <b>1</b>	0.6 <b>1</b>	
5	35.305 <b>3</b>	36.5 <b>1</b>	1.19 <b>3</b>	
6	35.125 <b>3</b>	35.8 <b>1</b>	0.675 <b>3</b>	
7	35.475 <b>3</b>	36.15 <b>2</b>	0.675 <b>3</b>	

Susan Hedge winemaster witness 1 zero 9 times  
2 zeros 3 times  
3 zeros 8 times

8.12.3. The text on page 7 below the Surveyors Contours states that it is proposed not to "interfere with the natural and existing flow of stormwater". However, the proposed dwelling and building pad will alter the existing characteristics of the stormwater drainage through the subject lot thus causing interference with the natural and existing flow of stormwater. I have depicted the proposed dwelling on the diagram in paragraph 1.2 above and repeated as follows. The discharge is affected by the proposed dwelling and pad which will act as a barrier to flow. Flow will have to traverse to the left of the proposed dwelling. This will concentrate the flow that discharges into Lot 1 RP117157 which is not permitted.



Goldish Corrigan states around 10 times in his report that the proposed dwelling and building pad will interfere with the natural drainage.

Corrigan is deluded and Susan Hedge promoted this garbage.



9.2.3. Drainage to the southwestern corner area of the subject lot (to the rear of the proposed new dwelling). This area is a low point and as discussed above in paragraph 4.7.2, the proposed new dwelling on the subject lot will cause concentration of stormwater at this location. Unless captured and conveyed, this stormwater will cause concentration of flow onto Lot 1 RP117157.



- 3.6. Detailed upstream stormwater modelling is required and has not been carried out by the Applicant. I have undertaken a rudimentary analysis of upstream catchment boundaries (in **Attachment C**) along with options for stormwater infrastructure that satisfies the objectives (**Attachment D**). This stormwater infrastructure satisfies the intent of the red indicative mark ups on the approved plan SK01.

## Corrigan loves doing Rudimentary reports.



Corrigan describes his own report as "**rudimentary**" Why would ratepayers have to pay for a rudimentary engineering report ?

What was the purpose? To protect your interests? Please advise the public and the Crime and Corruption Commission.

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002  
Unsatisfactory professional conduct of a registered professional engineer.

You knew these two Corrigan plans were flooded in depth (1.2m) and flow velocity (>30 L/s) at the kerb, but still instructed the allegedly fraudulent report and paid for it anyway.

### 7.6.3 Stormwater discharge to road reserves

#### 7.6.3.1 Connection to kerb and channel

- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to [BSD-8113](#)).

You knew that rainwater tanks are illegal as per PSP S7.5.3 (6).

### 7.5.3 General requirements

- (6) Council will not support the installation of on-site (lot-based) stormwater detention facilities in a residential subdivision on each freehold lot as there is no provision to adequately ensure these facilities are protected or maintained into the future.

Why was ratepayers money spent on an alleged fraudulent winemaster witness report?

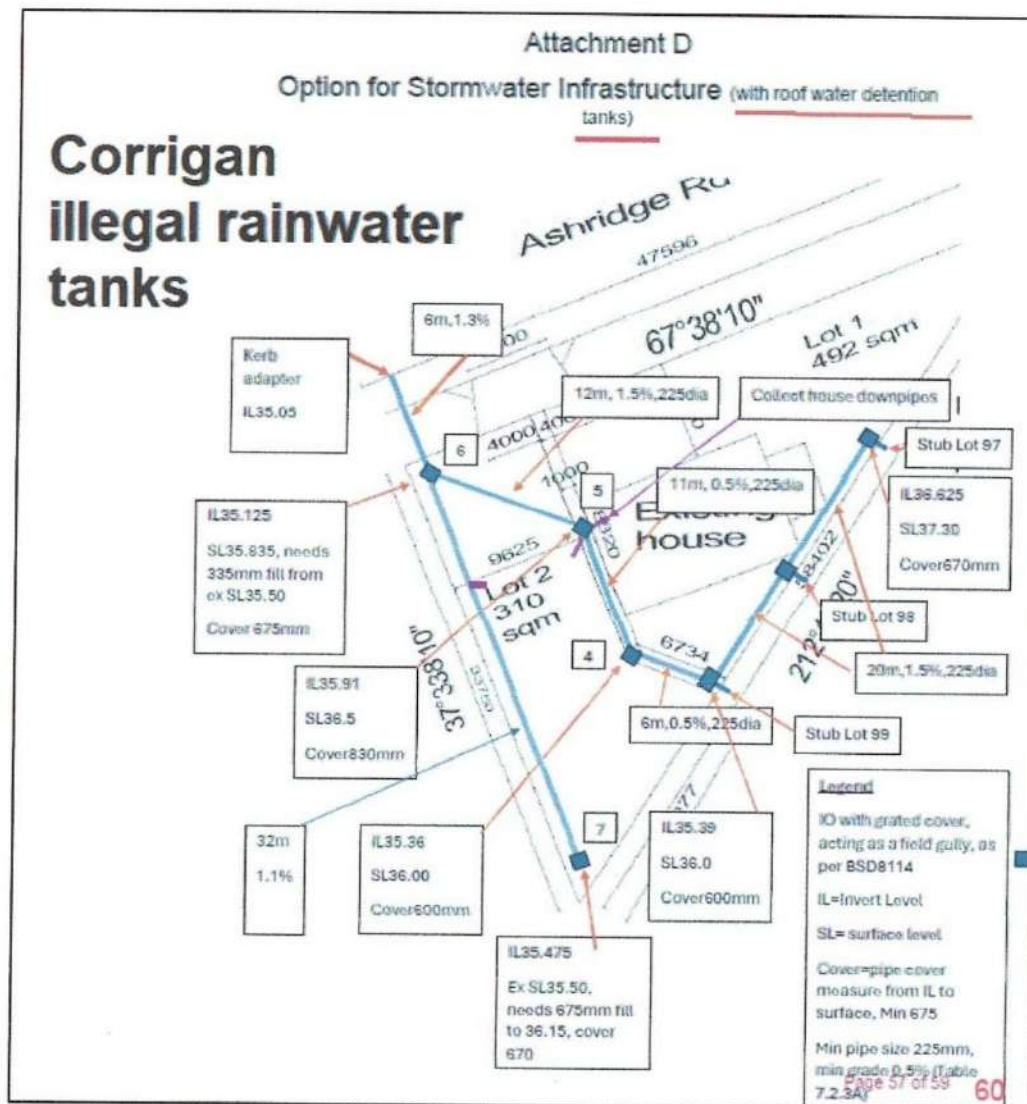
### Ratepayers of Brisbane have been fooled

What was the purpose? You have allegedly made fools out of the ratepayers of Brisbane and Judge Williamson KC.

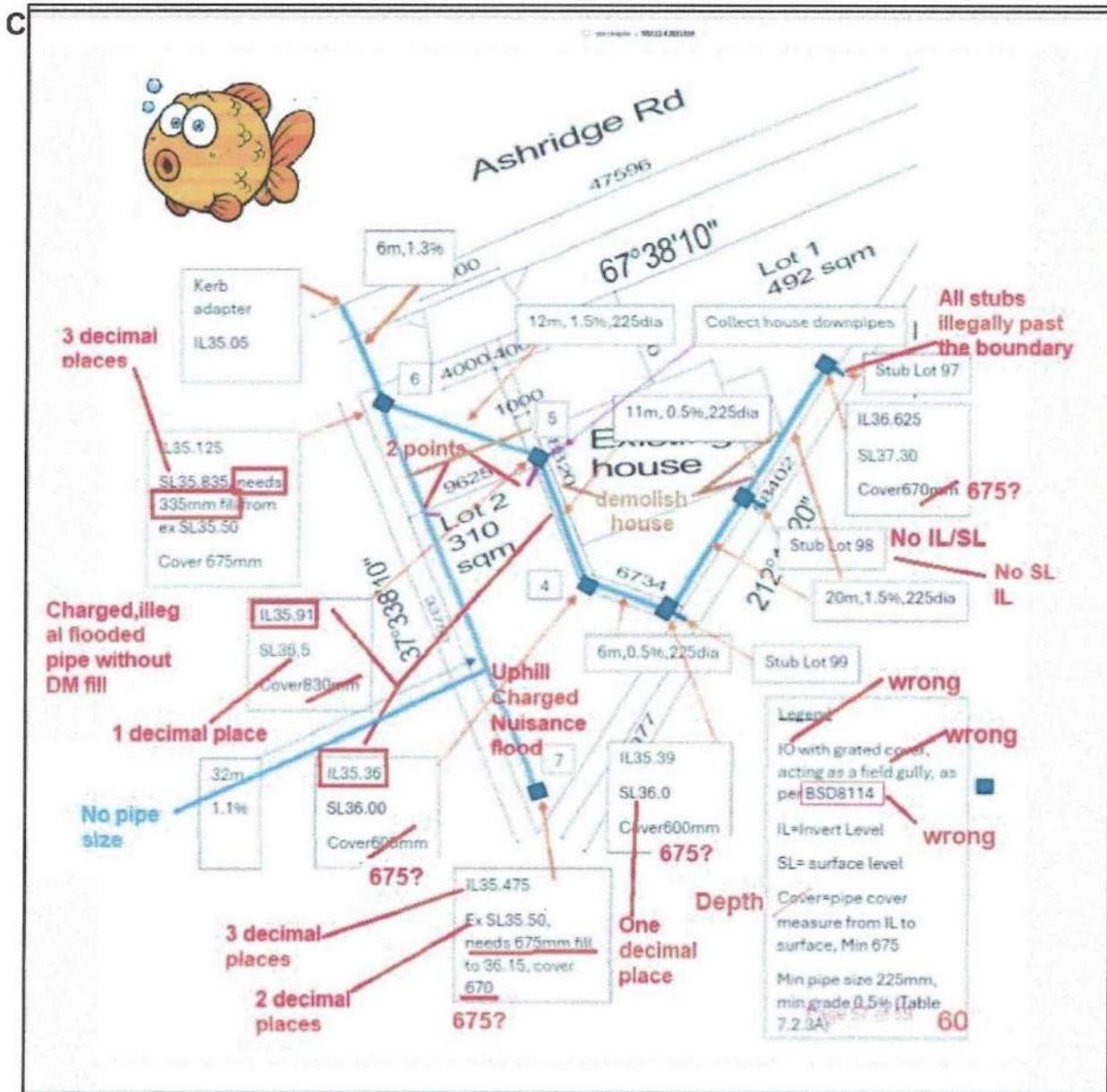


**Will Schrinner and Freeman be ordering anymore allegedly licenced or unlicenced, fraudulent civil and hydraulic plans? Please tell the ratepayers of Brisbane now.**

Is there any more flooded plans coming from Council that the Crime and Corruption Commission should be aware of?







### Corrigan flooded Plan 1

Above - some of the hundreds of intentional errors marked in red, placed by Corrigan, like hand grenades, in his plans, in order to fool Judge Williamson KC and the Brisbane public.

1) Corrigan called his own report "Rudimentary" and "indicative". Why would the Lord Mayor or CEO pay a person on behalf of the ratepayers for a rudimentary report?

**What CEO or Lord Mayor in Australia would pay for engineer to provide a "rudimentary" report, which by its own admittance, is Unsatisfactory Professional Conduct, of a registered professional engineer, Schedule 2 of the Professional Engineers Act, 2002m being a lesser standard than the engineering peers.?**



**This is an alleged offence which if found to be of a sufficient culpability may be punishable by imprisonment.**

Why would Schrinner and Freeman waste the Brisbane public and ratepayer's money for a rudimentary allegedly fraudulent report?

Why did Freeman and Schrinner not supply a Council engineer for the trial, as Manteit requested, by subpoenas?

**It is alleged that Schrinner and Freeman, and/or Susan Hedge and/or Sara McCabe allegedly instructed Corrigan to provide a "rudimentary" analysis, in order to hide legal actions against the unlicenced Council employees and their own reputations.**

**What other reason for a rudimentary report is there ?**

3.6. Detailed upstream stormwater modelling is required and has not been carried out by the Applicant. I have undertaken a rudimentary analysis of upstream catchment boundaries (in **Attachment C**) along with options for stormwater infrastructure that satisfies the objectives (**Attachment D**). This stormwater infrastructure satisfies the intent of the red indicative mark ups on the approved plan SK01.

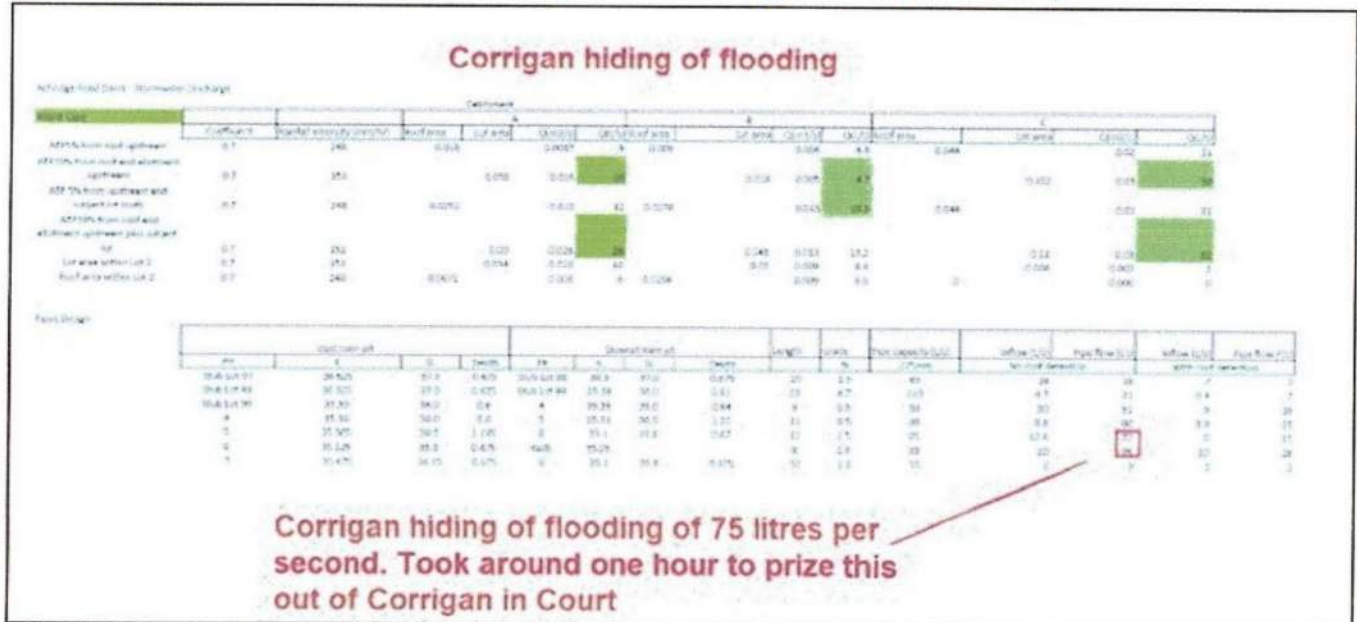
Corrigan report provided RPEQ certification. He should therefore be providing standards to that of his peers. His standard of engineering by his own admission is incompetent. "Rudimentary" is incompetent.

**Law broken by Corrigan-** Schedule 2 of the Professional Engineers Act 2002 Unsatisfactory professional conduct, of a registered professional engineer.

**2) Corrigan refused to supply a conclusion in his report on the total flow at the kerb.**



**Corrigan intentionally tried to hide any conclusion of flooding to fool Judge Williamson KC. It took about one hour for Corrigan to find his own report conclusion in Court, on 28-4-25 (after interrogation by Manteit)**



**Law broken by Corrigan** - Alleged fraud, punishable by prison.

## 2) Corrigan - "I used the same parameters as Civil Works"

### Two Options for Stormwater Drainage

### **Corrigan fraud**

9.7. I used the Rational Method to estimate stormwater flows. I set out stormwater design principles and assumptions for the calculations in this method in **Attachment C**. I note that my assumptions for parameters for stormwater calculations are the same as set out in the report by Civil Works Engineers. I provide a table of calculations of catchment size and pipe flows in **Attachment D**.

This is alleged fraud by Corrigan, in order to deceive Judge Williamson KC and the public. Corrigan has not used the same calculations and parameters whatsoever, as Civil Works, the most respected engineer in Brisbane.

Was this lie instructed by Schrunner and Freeman?

**Corrigan used allegedly fraudulent parameters, as listed below.**

**Law broken by Corrigan** - Alleged fraud, punishable by prison

## 14) Corrigan use of illegal 2019 contours instead of Contours 2003

Attachment		Corrigan - unlawful
B	Brismap 2019 Contours	

### Definition of natural ground level - City plan.

Column 1 Term	Column 2 Definition	City plan - lawful
Ground level	Ground level means— a. the level of the <u>natural ground</u> ; or b. if the level of the natural ground has changed, the level lawfully changed. Editor's note—Section 1.7.5 provides that for the purpose of the definition of ground level in Schedule 1, the level of the natural ground is deemed to have been lawfully changed if the level of the natural ground level is the prescribed level	

**1.7.5 Designated lawful change to ground level**

1. For the purpose of the definition of ground level in [Schedule 1](#), the level of the natural ground is deemed to have been lawfully changed if the level of the natural ground is the [prescribed level](#).

2. For the purpose of the definition of [prescribed level](#) in [Schedule 1](#), the 2002 contours are the contour information determined by the Council.

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## PRESCRIBED LEVEL

### BRISBANE CITY COUNCIL ADMINISTRATIVE DEFINITION

The level of the surface of the land:

- a. existing at the time the original estate was subdivided and roads created through the estate as determined by a registered surveyor under the *Surveyors Act 2003* using best available evidence which is based on:
  - i. the 'as constructed' drawings for the subdivision of the original estate lodged with the Council; or
  - ii. if paragraph (a)(i) does not apply, the 2002 contours of the Council's mapping system; or
- b. that is the result of operational work carried out as a consequence of a material change of use or reconfiguring a lot, if:
  - i. the material change of use or reconfiguring a lot was assessable development under the Council's planning scheme in effect between 1 January 2002 and the commencement of this planning scheme; and
  - ii. the operational work accords with the following:
    - A. the development approval for the material change of use or reconfiguring a lot;
    - B. the development approval which approved the operational work.

Editor's note—Section 1.7.5 provides that for the purpose of the definition of ground level in Schedule 1, the level of the natural ground is deemed to have been lawfully changed if the level of the natural ground level is the prescribed level.

Ground level is the prescribed level, which is Contours 2002.

The owner of 128 Ashridge Rd Darra has no obligation to raise the level of land.

**Law broken by Corrigan** - Use of illegal contours.

### 3) Corrigan laws broken -



- Use of **illegal rainwater tanks** in rear lots.
- Breaking of Council laws that require that the flow velocity for the development plus any external catchment is required to be no greater than 30 L/s at the kerb.
- **Use of Contours 2019** instead of Contours 2002.
- Illegal use of **Level II drainage** instead of Level III drainage
- Use of **7 illegal BSD 8114 kerb adaptors** in the middle of lot 2
- Use of fake **fraction impervious (fi)** used instead of Coefficient of discharge formula, understating rear lot flooding by 15%.
- Illegal **building of 2 houses** on lot 2
- Use of illegal two **townhouses** only, on rear lots to understate flooding.
- Use of **illegal flooded hydraulic plans** ending up .5m and .8m under the kerb.
- Use of numbers with **many different decimal places**, indicating Unsatisfactory Professional Conduct of a registered professional engineer. Corrigan claimed he was better than other engineers with his 3 zeros.
- Describing a catchment as half a lot, whereas in practice, the Killarney St
- Corrigan hiding of the fact that the rear lot numbers would be forced to use filling of a front lot to Killarney St, since the pipe place in 128 Ashridge Rd would not be sufficient to cater for the whole Killarney St lot.
- Corrigan has destroyed the opportunity for the Killarney St owners to replace an undersized pipe placed in any development of 128 Ashridge Rd.

This would invite legal action from Killarney St owners since they have no further option to negotiate with the owner of 128 Ashridge Rd for downstream development. (assuming 128 Ashridge Rd is downstream)

- Using of **illegal fill**.
- Illegal statement that a private certifier is required to seal a subdivision plan.

- Requirement of the **existing house to be demolished**
- Placing of **roofwater connection** for the new lot **under the proposed slab**, instead of near the front boundary.
- No placement of a **roofwater connection** as close as possible to the front boundary, to enable all possible construction, including a carport.
- **Understating of roof area in the rear lots**, of  $180 \times 2 = 360$  sqm. This statement on its own understates true flooding by 60%.
- Use of a **fake stormwater master plan**. This is not required by Council law.
- Not one **Planning Scheme Policy** was stated in the report.
- Pretending that a **"solution"** must be provided, yet there is no word "solution" in City Plan. Nor do Council assessment officers ask applicants to provide a solution. Corrigan states that the trigger is that water falls over the boundary.
- Corrigan failed to sight the fall of land affidavit supplied by Manteit,
- Fraudulent statement that he used the same parameters as Civil Works.

On the otherhand, Civil Works used the correct civil and hydraulic engineering principles and Planning Scheme Policies, at all times.

**4) Corrigan has not used flows pertaining to C2 and C20. This was done allegedly to deceive Judge Williamson KC.**



**7.3.3.1 Fraction impervious**

- (1) Designers are to refer to QUDM section 4.5 for methodology in determining the run-off coefficient
- (2) The C10 coefficients of discharge shown in Table 7.3.3.1.A are to be used for rational method calculations.

**Table 7.3.3.1.A—Coefficient of discharge C10 for development**

Development category	C10
Central business areas (including in the Principal centre zone and Major centre zone)	0.90
Industrial uses and other commercial uses (including in the District centre zone and Neighbourhood centre zone)	0.88
Significant paved areas (e.g. roads and car parks)	0.88
Medium density and high density residential land uses	0.88
Low-medium density residential land uses	0.87
Low density residential area (including roads)	
Average lot $\geq 750\text{m}^2$	0.82
Average lot $\geq 600\text{m}^2 < 750\text{m}^2$	0.85
Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.86
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.87
Low density residential area (infill subdivision excluding roads)	
Average lot $\geq 750\text{m}^2$	0.81
Average lot $\geq 600\text{m}^2 < 750\text{m}^2$	0.82
Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.83
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.85
Rural/environmental protection areas (2–5 dwellings per ha)	0.74
Open space areas (e.g. parks with predominately vegetated surfaces)	QUDM, Table 4.05.3(b)

**Above - Legal PSP 7.3.3.1 Coefficient C10.**

**The Coefficient C10 nominated by Council is used to calculate Coefficient C2 and C20.**

**The higher of C2 or C20 is taken to be the standard used for flooding**

**Law broken by Corrigan - S7.3.3.1 - Fraction impervious**

**Law broken by Corrigan - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, of a registered professional engineer**

### **5) Fake formula used by Corrigan to allegedly deceive Judge Williamson KC**

Corrigan intentionally used a fake fi (fraction impervious) to allegedly deceive Judge Williamson KC to understate flooding.

### Stormwater design assumptions **(Corrigan)**

- d. Coefficient of discharge  $f_i=0.7$  (worst case = town house development upstream), as per QUDM Section 4.5

**Notes (Table 4.5.1):**

1. Designer should determine the actual fraction impervious for each development. Local governments may specify default values.
2. Typically for urban residential high density developments:

townhouse type development	$f_i = 0.7$
multi-unit dwellings > 20 dwellings per hectare	$f_i = 0.85$
high-rise residential development	$f_i = 0.9$

**fake formula,  
promoted by  
Corrigan and Hedge**

**Corrigan's states that the Coefficient of Discharge is  $f_i = .7$  ...as per QUDM 4.5"**

This statement by Corrigan is 100% fraudulent, since  $f_i$  (fraction impervious) is not a Coefficient of Discharge.

Did Schrinner and Freeman instruct Corrigan to use a fake formula and be allegedly fraudulent?

Why did Schrinner and Freeman allow this allegedly fraudulent conduct?

**Table 4.5.1 – Fraction impervious vs. development category**

Development category	Fraction impervious ( $f_i$ )
Central business district	1.00
Commercial, local business, neighbouring facilities, service industry, general industry, home industry	0.90
Significant paved areas e.g. roads and car parks	0.90
Urban residential – high density	0.70 to 0.90
Urban residential – low density (including roads)	0.45 to 0.85
Urban residential – low density (excluding roads)	0.40 to 0.75
Rural residential	0.10 to 0.20
Open space and parks etc.	0.00

**Notes (Table 4.5.1):**

1. Designer should determine the actual fraction impervious for each development. Local governments may specify default values.
2. Typically for urban residential high density developments:

townhouse type development	$f_i = 0.7$
multi-unit dwellings > 20 dwellings per hectare	$f_i = 0.85$
high-rise residential development	$f_i = 0.9$

#### 7.3.3.1 Fraction impervious

- (1) Designers are to refer to [QUDM](#) section 4.5 for methodology in determining the run-off coefficients.
- (2) The C10 coefficients of discharge shown in [Table 7.3.3.1.A](#) are to be used for rational method calculations.



**Law broken by Corrigan S7.3.3.1 - Fraction impervious****Table 7.3.3.1A - Coefficient C10  
Used in formula to calculate  
C2 and C20****Law broken by Corrigan****- Table 7.3.3.1 A**

Table 7.3.3.1A—Coefficient of discharge C10 for development	
Development category	C10
Central business areas (including in the Principal centre zone and Major centre zone)	0.90
Industrial uses and other commercial uses (including in the District centre zone and Neighbourhood centre zone)	0.88
Significant paved areas (e.g. roads and car parks)	0.88
Medium density and high density residential land uses	0.88
Low-medium density residential land uses	0.87
Low density residential area (including roads)	
Average lot $\geq 750\text{m}^2$	0.82
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Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.86
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.87
Low density residential area (infill subdivision excluding roads)	
Average lot $\geq 750\text{m}^2$	0.81
Average lot $\geq 600\text{m}^2 < 750\text{m}^2$	0.82
Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.83
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.85
Rural/environmental protection areas (2–5 dwellings per ha)	0.74
Open space areas (e.g. parks with predominately vegetated surfaces)	QUDM, Table 4.05.3(b)

The above statement by Corrigan is allegedly fraudulent, since  $f_i$  is not a Coefficient of Discharge. It is simply fraction impervious, which is used in the formula of Coefficient of Discharge.

Corrigan again allegedly demonstrated intention to deceive Judge Williamson KC by using fake formulas. This in turn lowers the estimated flood levels from the rear lots.

This action alone by Corrigan understated the rear lot flooding by around 15%.



**Law broken by Corrigan** - Table 4.5.1 of the QUDM.

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional Conduct, of a registered professional engineer

**Law broken by Corrigan** - alleged fraud

Once again the CEO Dr Freeman and Lord Mayor have wasted the ratepayers money by allegedly instructing a fake formula fool.

5) Corrigan confirmed that the Council employee non RPEQ certified plan

**approved Upstream Drainage red line is 1.2m under the Ashridge Rd kerb.**

9.11.3. Civil Works Engineers then depicted Diagram 3 where correct ground cover was assumed and the conclusion made that the discharge level of the pipe accordingly would be lower than the kerb level in Ashridge Road. As stated above, I don't disagree with the levels shown by Civil Works Engineers. However, in my experience, a stormwater designing civil engineer would move to a design such as in my **Attachment D** which does achieve the necessary levels.

**Corrigan confirmed that the unlicensed Council employee plan would end up 1.2m under the kerb.**



Any child over 8 years of age would have known that would happen as stated in the Notice of Appeal, by Manteit, that the pipes would end up 1.2m under the kerb.

It had been advertised on [Brisbane City Council Complaints](#) since 10/10/24.

Either you are allegedly very dumb or very dishonest. It has to be one or the other or both.

Schrinner, Freeman and Susan Hedge have allegedly forced Judge Williamson KC to look at red lines for 7 months, intentionally wasting the Court's time.

Susan Hedge lied in Court at least 4 times to Judge Williamson KC, stating on 24-4-25 that -

- Council's position for the trial was as of 31-1-25 and
- Mr Manteit had everything that he needs that Council relied on for the trial.
- Susan Hedge said she needed to put "all the cards" on the table.



## Upstream and Onsite Drainage

Corrigan proposed 2 hydraulic plans (and further flooded permutations) that are all flooded under the Ashridge Rd kerb.

These are now the third and fourth flooded Upstream Drainage plans that Brisbane City Council have concocted, or instructed to be concocted.

Corrigan combined the Upstream and Onsite Drainage.

Both Corrigan plans require illegal rainwater tanks.

It is alleged that the Schrunner, Freeman, Hedge and McCabe intentionally and unashamedly instructed the preparation of a shonky engineering report in order save the reputation and criminal charges being laid upon them and the Council employees, by the Crime and Corruption Commission and to avoid legal claims by the Applicant.

The result was the preparation of a shonky engineering report by Andrew Corrigan that promoted two-four further flooded hydraulic plans, in depth and flow, filled with over 150 intentional errors like hand grenades and broke over 23 Council laws.

## Corrigan System 1 - flooded under Ashridge Rd by at least 363 mm. Corrigan relied on rainwater detention tanks.

This flooded system was concocted by Corrigan which relied totally on fake illegal rainwater tanks as per PSP S7.5.3 (6).

Corrigan system 1 around 75 litres per second.								
	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	Cross check
FSL	37.300	37.000	36.000	36.000	35.798	35.500	35.300	
Pipe Length		20000	20000	6000	11000	12000	6000	75000 m
New start of line invert level brought forward		36.625	36.325	35.250	35.220	35.048	34.750	36.625 m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.060	0.060	-0.405 m
Invert level end of line	36.625	36.525	36.225	35.220	35.165	34.988	34.690	m
Prima facie depth (needs to be min 675)	0.675	0.475	-0.225	0.780	0.633	0.512	0.610	m
Pipe needs to be lowered by to make it work		0.200	0.975	0.000	0.117	0.238		-1.530 m
Adopted pit level		36.325	35.250	35.220	35.048	34.750	34.690	34.690 m
Lawful point of discharge							35.053	
Corrigan charged system malfunction in metres							-0.363	m

As per Manteit later filed calculations, and tabled in Court.

### Judge Williamson KC

I suspect you will. Can I ask you to put that to one side for the moment?

Mathematically, if these are the numbers, do you have any reason to doubt that if you work them through, that it arrives at a minus 0.363 of a metre? Any reason to doubt that if all the numbers above it ?

### Corrigan

No reason to doubt the calculation, no.

### Judge Williamson KC

But you differ as to whether theoretically or that's the correct approach.

### Corrigan

I don't believe it's the correct approach, no.

Corrigan claimed that fill will fix his flooding up but that is not correct.

It doesn't matter what fill is placed on the land, one is constrained by Rear lot invert level, 375 pipe, 450 cover and kerb invert level,

These cannot be changed. Goldfish Corrigan and bumbling barrister Hedge did not realize this.



## Corrigan System 2 - charged by 790 mm - Corrigan relied on three illegal kerb adaptors.

Corrigan system 2 around 75 litres per second								
	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	Cross check
FSL	37.300	37.000	36.000	36.000	35.798	35.500	35.300	
Pipe Length		20000	20000	6000	11000	8000	8000	73000 mm
New start of line invert level brought forward		36.625	36.325	35.250	35.220	35.048	34.750	36.625 m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.040	0.080	-0.405 m
Invert level end of line.	36.625	36.525	36.225	35.220	35.165	35.008	34.670	m
Prima facie depth (needs to be min 675)	0.675	0.475	-0.225	0.780	0.633	0.492	0.630	m
Pipe needs to be lowered by to make it work.		0.200	0.975	0.000	0.117	0.258	0.000	-1.550 m
Adopted pit level		36.325	35.250	35.220	35.048	34.750	34.670	34.670 m
Lawful point of discharge							35.460	
Corrigan charged system malfunction in metres							-0.790	m

As per Manteit filed calculations

The above levels calculations are very simple to calculate.

### Notes:

a) Corrigan has intentionally disguised flooding by using illegal filling. That does not make any difference to being flooded or not. See below.

b) Corrigan surface level of 36.0 for pit 4 is misleading by Corrigan, since the surveyors level states 35.610 for lot, at the boundary.

In the same way, Corrigan surface level for stub 98 is also misleading, since the surveyors level is 36.790.

This surface level must be used to command the lot, to prevent the rear lot owner from having to fill up his land.

c) **Filling of land will not assist in any way to remove their flooding.** This point was extensively been explained by Manteit in filed documents.

Susan Hedge and Corrigan both are very stupid to believe that filling of land will make the plans dry and have attempted to fool Judge Williamson KC yet again.

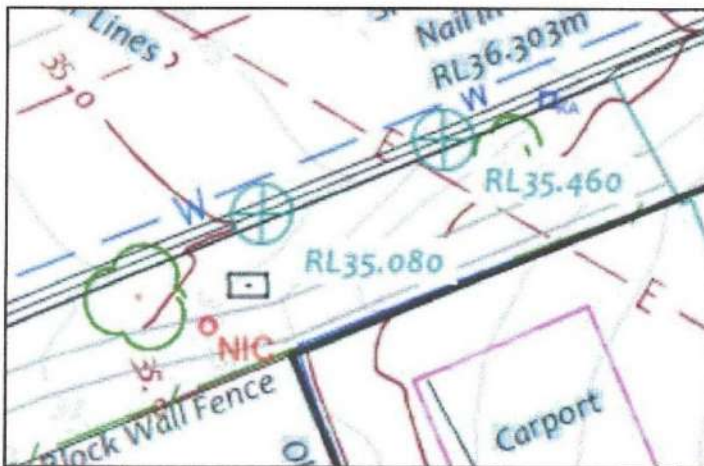
Dumbo Susan Hedge and winemaster Corrigan had an allegedly fraudulent last minute gasp in the Court on 29/4/25 by stating that fill up to 1 metre would fix up Corrigan's delusions.

However, there are certain parameters that are fixed and cannot be changed -

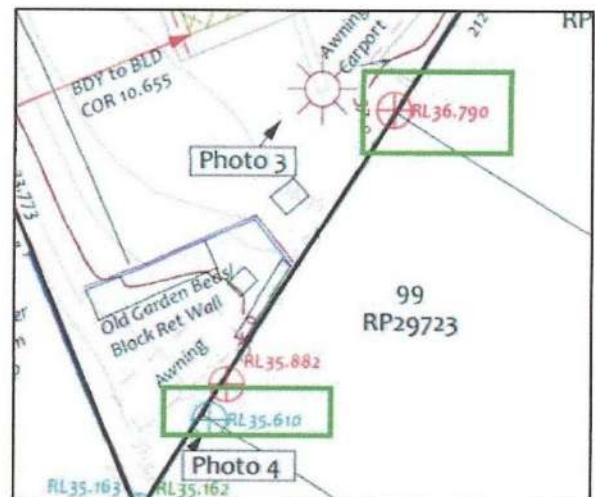
- Invert level below ground at the rear adjoining boundary as starting point
- Invert level of kerb
- 450 cover pf pipe
- 150 depth of pipe, at kerb to allow 124\*75 RHS steel and 75 dirt cover.
- 375 pipe for flow velocity over 84 m/s

20,000 trucks of dirt placed on the land will not fix up Corrigan's alleged fraud in relation to the pipes being flooded under Ashridge Rd.

**Updated survey levels, ONF, filed - "Fall of land" affidavit.**



**Updated survey levels, ONF, filed,  
Showing IL 35.080  
and IL 35.460**



**IL 35.610 and 36.790**

Corrigan refused to examine this affidavit filed, and relied on in Court by Manteit.



## Corrigan surface levels adjusted for proper survey levels.

**Corrigan fake flood calculations, adjusted  
allowing for certified surveying levels at boundary  
375 pipe, 450 cover, .5% fall behind boundary,  
1% on footpath**

**Corrigan system 1 stated around 75 litres per second, admitted understated by 15%  
Pipe 375mm**

	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	Cross check	
FSL	37.250	36.790	35.610	36.000	35.798	35.500	35.250		
Pipe Length		20000	20000	6000	11000	12000	6000	75000	mm
New start of line invert level brought forward		36.425	35.965	34.785	34.755	34.700	34.640	36.625	m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.060	0.060	-0.405	m
Invert level end of line.	36.425	36.325	35.865	34.755	34.700	34.640	34.580		m
Prima facie depth (needs to be min .825, .15)	0.825	0.465	-0.255	1.245	1.098	0.860	0.670		m
Pipe needs to be lowered by to make it work.		0.360	1.080					-1.440	m
Adopted invert level		35.965	34.785	34.755	34.700	34.640	34.580	34.780	m
Lawful point of discharge							35.083		
Corrigan charged system malfunction in metres							-0.503		m

**Green**

**Assume surface level and invert levels in rear lot  
and kerb cannot be changed and are fixed.**

**Blue**

**Assume surface level can be changed**

It was discovered after the trial that Corrigan failed to use the Court filed survey levels of ONF surveying in the affidavit called "Fall of Land"

This affidavit demonstrated that the **fall of land at the boundary was to the rear lots, 98 and 99.**

The above table has been updated with those levels and also highlights that the levels in green cannot be changed.

In addition it shows the correct pipe 375 mm for over 84 L/s, not 250mm pipe.

## Council flooded plan 5 - Corrigan up the garden path.



Corrigan has suddenly designed a fifth Council flooded plan.

Corrigan says to **keep the pipe up at the pathway level** so that his pipe works.

Corrigan must be a goldfish. He has already drawn his pipe in the pathway !!!!!????

Corrigan has contradicted himself, since he states he has used the levels but already drew the pipes in the driveway as is.

*Manteit - built up the house pad by 790mm,  
it would work?*

**David Manteit**

Well, could I say, Mr Corrigan, if we built up the house pad by 790mm, it would work? And you'll still want

**Corrigan**

It would certainly, it would possibly work. There are going to be other issues. I mentioned earlier, you may not need to build it up by that much.

You may be able to put the stormwater pipe, I'll deal with the sewerage in a moment, but you may be able to put the stormwater pipe behind the retaining wall.

You know, you took me to the plan by Civil Works engineers before, and there's cross section B, which is

That one. I mean, it shows quite nicely that you could put the stormwater pipe in the pathway behind that retaining wall, and you wouldn't have to lift the house pad.

*"It shows quite nicely that you could put  
the stormwater pipe in the pathway"*

**Corrigan**

The easiest way would be to simply lift the pad to suit the stormwater.

29-4-25

I've heard that that would involve possibly more work and expense and so on.

There are other solutions.

The routing of the stormwater line is between the existing house and the proposed house and almost certainly there will be a pathway there in that separation.

Now there's then a small retaining wall proposed to take care of the drop in level to the proposed house pad. I mean, one of the options is to keep the proposed stormwater under that pathway and keep the pipe up at the level required so that my solution works.

**keep the pipe up at that level (pathway)**

I can't see why that actually can't be done, rather than have to go and redesign the pad.

So I think that's down to this detail of coordinating it all. That's the first explanation here.

The second issue then is pit number six. So what has happened there is that where I show the surface level for pit number six, which is the second bottom row, I assume that there'll be a small amount of fill in that corner of the site to give the requisite cover because, in my experience, the overriding issue for pipe design is the invert levels to make the pipe flow work so that you don't have any step-ups or charging, so to speak.



**Council flooded plan 5**

**Corrigan the goldfish - keep it up at the pathway level.**

**375 pipe, 450 cover, .5% fall behind boundary,  
1% fall on footpath,**



Corrigan system 1 stated around 78 litres per second, admitted understated by 15%

**Pipe 375mm**

	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	check	
FSL	37.300	36.790	35.610	36.750	36.750	36.000	35.250		
Pipe Length		20000	20000	6000	11000	12000	6000	75000	mm
New start of line invert level brought forward		36.475	35.965	34.785	34.755	34.700	34.640	36.425	m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.060	0.060	-0.405	m
Invert level end of line.	36.475	36.375	35.865	34.755	34.700	34.640	34.580		m
Prima facie depth (needs to be min .825, .1)	0.825	0.415	-0.255	1.995	2.050	1.360	0.670		m
Pipe needs to be lowered by to make it work.		0.410	1.080					-1.490	m
Adopted invert level		35.965	34.785	34.755	34.700	34.640	34.580	34.530	m
Lawful point of discharge							35.083		
Corrigan charged system malfunction in metres							-0.503		m

**Green**

**Assume surface level and invert levels in rear lot  
and kerb cannot be changed and are fixed.**

**Blue**

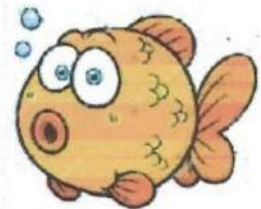
**Assume surface level is adjustable**

**Corrigan the goldfish pathway plan does not change the flooded level of .503.**

Please note that Manteit does not accept that any easement can be placed in the yard, being more that 600mm away from the boundary.

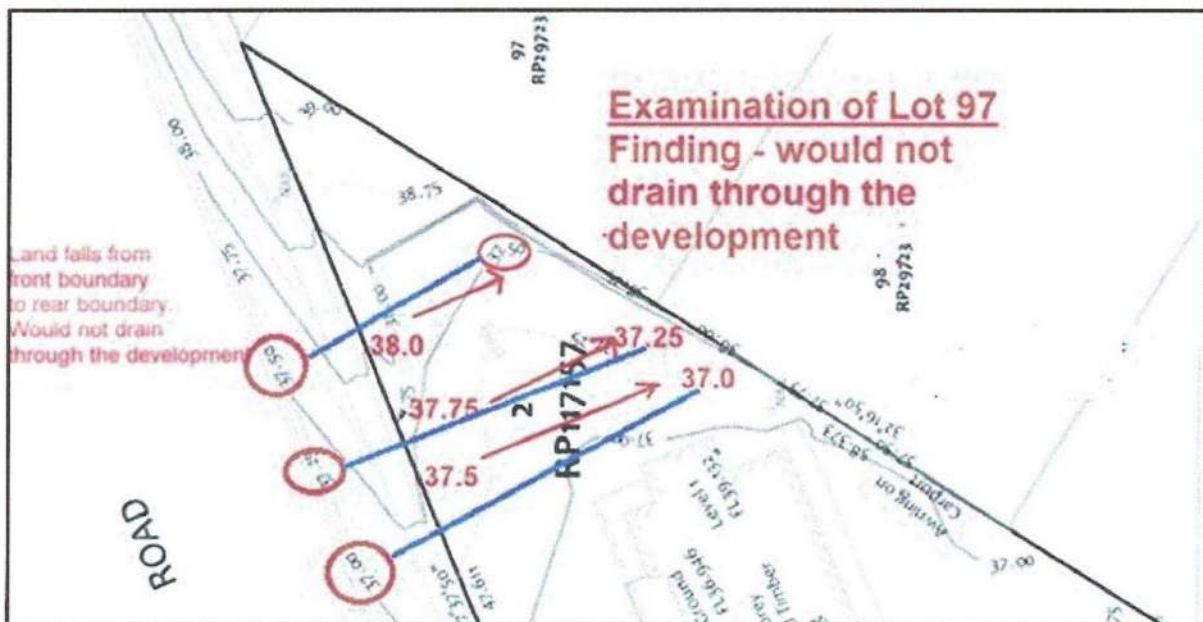
**Council flooded plan 6 - Corrigan goldfish "go straight across lot 97" "That would solve a lot of problems"**

**"What was going through my mind when I was listening"**



**Corrigan wants to use a pipe 24-4-25 with an instrument.**

If it turns out that a detailed modelling with no detention takes place, there are ways to do a third outlet. I mean, for example, what was going through my mind when I was listening before was that there could be yet **another pipe with an instrument** from lot 97 straight across to the northeast of the existing house, which would solve a lot of problems. So there are these different concepts that one could Yes,



**Manteit depiction of Corrigan since he is too lazy to do a plan himself.**



**Council flooded plan 6**

**Lot 97 - Corrigan goldfish idea in Court - "go straight across lot 97"**  
**"would solve a lot of problems"**



	Stub 97				Pit 1	Kerb	Cross check	
FSL	37.300				37.775	37.250		
Pipe Length					9483	3600	13083	mm
New start of line invert level brought forward					36.550	36.361	36.550	m
Min .5% fall, 1% over verge					0.189	0.037	-0.226	m
Invert level end of line	36.550				36.361	36.324		m
Prima facie depth (needs to be min .825, .1)	0.750				1.414	0.926		m
Pipe needs to be lowered by to make it work.							0.000	m
Adopted invert level					36.361	36.324	36.324	m
Lawful point of discharge						37.250		
Corrigan goldfish in court alternative charge						-0.926		m

**Green**

**Assume surface level and invert levels in rear lot  
and kerb cannot be changed and are fixed.**

**Blue**

**Assume surface level can be changed**

**Note that this plan is not accepted by Manteit due to**

- charged by .926m
- non-compliant with BSD 8111
- Would stop any further building including a 3 lot subdivision

Please note that Manteit does not accept that any easement can be placed in the yard, being more that 600mm away from the boundary. This depiction has been done for transparency purposes.

## Council flooded plan 7 - including lot 98

### Council flooded plan 7

Lot 97 - Corrigan goldfish idea in Court - "go straight across lot 97"  
plus pick up Lot 98



	Stub 97	Stub 98				Pit 1	Kerb	check	
FSL	36.790	37.300				37.775	37.250		
Pipe Length						9483	3600	13083	mm
New start of line invert level brought forward						36.040	35.851	36.550	m
Min .5% fall, 1% over verge						0.189	0.037	-0.226	m
Invert level end of line.	36.040					35.851	35.814		m
Prima facie depth (needs to be min .75, .15)	0.750					1.924	1.436		m
Pipe needs to be lowered by to make it work.								0.000	m
Adopted invert level						35.851	35.814	36.324	m
Lawful point of discharge							37.250		
Corrigan goldfish in court alternative charge							-1.436		m



Green



me surface level and invert levels in rear lot



and kerb cannot be changed and are fixed.

Blue

Assume surface level can be changed

Note that this plan is not accepted by Manteit due to these reasons -

- Being charged by 1.436 m
- Being non-compliant with BSD 8111
- Would stop any further structures including a 3 lot subdivision and carport

This plan was done by Manteit to cover another permutation not put forward by Corrigan, in the interests of transparency.



## **6) Corrigan and Council block off all services to Lot 2 - easements**

Corrigan intentionally placed the two hydraulic lines and easements in the front yard of lot 2, thereby eliminating any way for the owner to provide -

Power  
NBN / phone  
Water supply  
Private drains  
Any construction of anything including a carport.

**Due to the Council easement, Council can/have -**

- Full and free right and liberty at all times to enter upon the servient tenement
- To have, lay, construct and forever use and maintain such works
- As the grantee considers appropriate.
- Any works, or things located on or within the servient tenement.
- Issue a notice in writing to the Grantor (Manteit) to rectify any breach of its obligations under this easement by undertaking works

**Corrigan has attempted to fool Judge Williamson KC and the ratepayers of Brisbane, causing the owner David Manteit to fail to seal the subdivison plan**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a professional engineer

**Law broken by Corrigan** - Newtons law of gravity

**Corrigan and Council easements world force all construction in front of land including a carport**

As a person who has sold 200 carports within the first six metres behind the front boundary, I am aware of the town planning requirements for a carport.

1) There is an existing carport. Corrigan and Council are forcing me to demolish that

structure.

2) Council and Corrigan easements mean that I could not construct a future carport.

3) Both houses on the left and right side of the subject lot have carports. Whilst a neighbour consent should be asked for. However it would not be rejected by Council.

4) Council have the right to construct anything over the easement they want.

This prevents any construction by the owner.

Who instructed that Manteit was never to receive a copy of this easement ?

Was it Schrinner or Freeman? Who?

The withholding of the easement document has thwarted the prosecution of the case and stopped the subdivision.

Damages will apply for withholding of the easement document.



## SCHEDULE

Title Reference **to issue out of**

This is the Schedule referred to in the Form 9 Easement between [###] ('Grantor') and BRISBANE CITY COUNCIL ('Grantee'). The Grantor and Grantee DO HEREBY COVENANT AND AGREE with each other in the following terms:

### 1. Definitions and Interpretation

#### 1.1. In this Easement, unless the context otherwise requires:

- (a) **Authorised Persons** means employees, officers, agents, contractors, subcontractors, licensees and other persons claiming by, through or under the Grantee.
- (b) **Easement** means this document (which includes the Form 9 and this Schedule).
- (c) **Obstructions** means buildings, fences, walls, structures, (whether of the class just mentioned or not) or pavings.
- (d) **Plant and Equipment** means vehicles, equipment, machinery, tools and materials.
- (e) **Relevant Works** means underground drains, pipes, conduits and channels for the passage or conveyance of Stormwater Drainage and all manholes, manhole chambers, inlets, equipment and fittings in connection with or for the accommodation of any adjoining or neighbouring property or otherwise in the execution of the Grantee's drainage powers.
- (f) **Servient Tenement** means the land described as such in Item 2 of the Form 9.
- (g) **Stormwater Drainage** means rain water and associated drainage and stormwater run-off flowing in concentration either intermittently or occasionally.
- (h) The expression 'the Grantee' shall include the successors of the Grantee.
- (i) The expression 'the Grantor' shall include the respective transferees and assigns of the Grantor and the registered proprietor, owner (and their respective successors, executors, administrators and assigns as the case may be) and the occupier for the time being of the Servient Tenement.
- (j) Words importing the singular number include the plural number and vice versa and words importing any gender include the other genders and words importing only persons include corporations and/or associations and/or bodies and vice versa in each respective case.

### 2. Grant of Easement

- 2.1. The Grantor hereby grants and transfers to the Grantee an easement for the full and free right and liberty at all times to enter upon the Servient Tenement to have, lay, construct and then forever use and maintain any such Relevant Works on, over, through or under the Servient Tenement as the Grantee considers appropriate as well as obtaining free and uninterrupted access to the Servient Tenement and any works or things located on or within the Servient Tenement.

### 3. Rights of Grantee

- 3.1. The Grantee and its Authorised Persons may, enter upon the Servient Tenement with full, free, uninterrupted access, right and liberty at all times:
- (a) for the purposes of installing any Relevant Works;
  - (b) for the purposes of changing the size and number of, operating, inspecting, patrolling, altering, removing, replacing, reconstructing and/or repairing the Relevant Works;

Above - Easement document 2 of 3, hidden from Manteit for 7 months until the end of the trial, on 30-4-25

# SCHEDULE

## Title Reference to issue out of

- (c) to enter upon and remain, pass and repass over, along and under the Servient Tenement or any part thereof with all Plant and Equipment considered necessary by the Grantee to undertake any Relevant Works;
- (d) to dig into, sink shafts in, erect scaffolding upon and to open and break up the soil of the Servient Tenement or any part thereof (including the subsurface and the surface) and to bring and place Plant and Equipment in and upon the Servient Tenement or any part thereof; and
- (e) to do such other incidental works and things through, across, in or under the Servient Tenement as the Grantee shall in its discretion think fit.

3.2. The Grantee will in exercising the Grantee's rights under clause 3.1 cause as little damage as possible. The Grantee will only be responsible or held liable for such damage or inconvenience to the owners, or occupiers for the time being, of any part of the land of which the Servient Tenement forms part or any subdivision thereof as may be caused or suffered by reason only of the neglect or default of the Grantee and its Authorised Persons.

3.3. For all or any of the above purposes, the Grantee and its Authorised Persons with or without Plant and Equipment, may have the right to use such land of the Grantor immediately adjacent to the Servient Tenement as may reasonably be required by the Grantee in connection with all or any of the said purposes.

## 4. Grantor's obligations

4.1. Notwithstanding the generality of the foregoing, the following provisions shall apply:

- (a) the Grantor shall not:
  - (i) erect any Obstructions; or
  - (ii) erect, permit or suffer to remain any Obstructions on the land of the Grantor immediately adjacent to the Servient Tenement;

whereby the rights of the Grantee set out in this Easement are materially restricted or diminished unless and to the extent only that any such Obstructions are permitted in writing by the Grantee and only on such terms and conditions as the Grantee may impose or require in the event of such permission being granted.

- (b) In the event the Grantor acts or omits to act or suffers an act or omission in contravention of the provisions contained or implied in this Easement, the Grantee may if it chooses to in its absolute discretion, but is under no obligation to:
  - (i) demolish, remove or otherwise dispose of any Obstruction or thing whatsoever at any time on or in the Servient Tenement in contravention of the foregoing provisions; or
  - (ii) issue a notice in writing to the Grantor to rectify any breach of its obligations under this Easement by undertaking works including, but not limited to, the works detailed in item (i) above;

at the cost of the Grantor.

## 5. Costs

- (a) The Grantor is responsible for the cost of complying with the Grantor's obligations set out above including where the Grantor acts or omits to act or suffers an act or omission in contravention of the provisions contained or implied in this Easement, and for the costs, charges and expenses of and incidental to the preparation, stamping and registration of this Easement.
- (b) The Grantee is responsible for the cost associated with the Rights of the Grantee as set out above and is not required to contribute to the cost of maintaining the surface level of the Servient Tenement.

UGROUND DR

Above - Easement document 3 of 3, hidden from Manteit for 7 months until the end of the trial, on 30-4-25



2. Grant of Easement	<b>Council have right to access and at all times to Council ... to construct .. forever...such works</b>
2.1.	The Grantor hereby grants and transfers to the Grantee an easement for the full and free right and liberty at all times <u>to enter upon the Servient Tenement to have lay, construct and then forever use and maintain any such Relevant Works on over through or under the Servient Tenement</u> as the <u>Grantee considers appropriate as well as obtaining free and uninterrupted access to the Servient Tenement</u> and any works or things located on or within the Servient Tenement.
3. Rights of Grantee	
3.1.	The <u>Grantee</u> and its Authorised Persons may, <u>enter upon the Servient Tenement</u> with full, free, uninterrupted access, right and liberty at all times:

4. <b>Grantor's obligations</b>	
4.1.	Notwithstanding the generality of the foregoing, the following provisions shall apply:
(a)	the <u>Grantor shall not</u> :
(i)	<u>erect any Obstructions</u> ; or <b>Carport</b>
(ii)	erect, permit or suffer to remain any Obstructions on the land of the Grantor immediately adjacent to the Servient Tenement; <b>House - Corrigan stormwater is under the house pad</b>
whereby the rights of the Grantee set out in this Easement are materially restricted or diminished unless and to the extent only that any such Obstructions are permitted in writing by the Grantee and only on such terms and conditions <u>as the Grantee may impose</u> or require in the event of such permission being granted.	
(b)	In the event the Grantor acts or omits to act or suffers an act or omission in contravention of the provisions contained or implied in this Easement, the Grantee may if it chooses to in its absolute discretion, but is under no obligation to:
(i)	demolish, remove or otherwise dispose of any Obstruction or thing whatsoever at any time on or in the Servient Tenement in contravention of the foregoing provisions; or
(ii)	issue a <u>notice in writing to the Grantor to rectify any breach of its obligations under this Easement</u> by undertaking works including, but not limited to, <u>the works detailed in item (i) above</u> ;

## Corrigan's easement terms implications -

As owner, I would be banned from walking in my front yard.

As owner, I could not possibly provide or install any underground services nor construct any structure such as a carport. The existing carport would need to be demolished.

Manteit has requested this easement document to be provided to him on 1/10/24, from Margaret Orr and the other Council employees refused to supply a copy of this document. There have been many requests that have been filed.

Schrinner and Freeman Council employees have refused to supply the easement document. This is another item on the list for Council employee corruption.

Manteit had supplied copious amounts of letters of request to the allegedly corrupt Council employees. Those requests have all been filed in Court.

This is alleged Council employee corruption. Schrinner and Freeman either knew of all the past requests for the easement documents, or would have found out on the date of the Notice of Appeal 19/11/24.

### **BSD 8111**

Non-compliance with maximum setback of boundary 600mm. Refer 4139/18 Henderson V Brisbane City Council and 3 approved S81 applications in 2025.

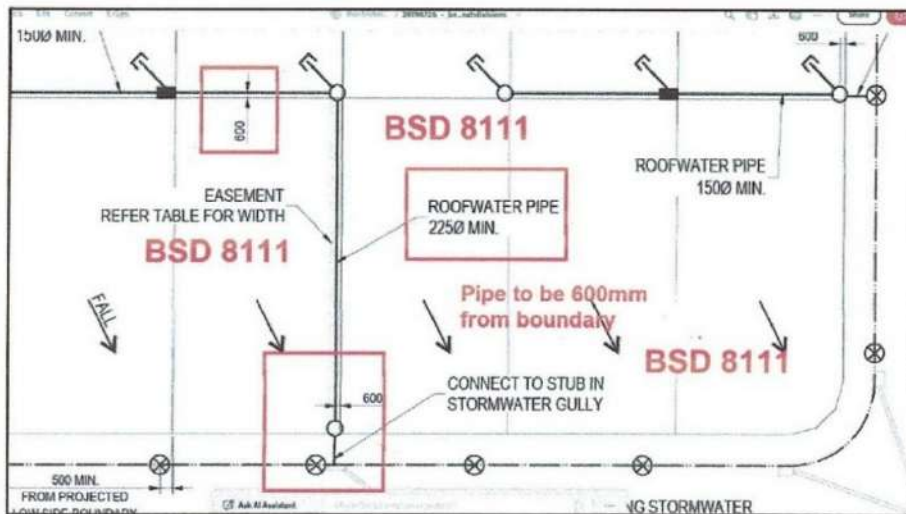


**Above - refer 4139/18 Henderson V Brisbane City Council and 3 approved S81 applications in 2025.**

There are no cases in the David Manteit filed Crime and Corruption audit of 412 cases where there was Upstream Drainage, in which the pipes were designed greater than 600mm from the side boundary, and easements outside 900mm unless there was owner consent.

Council cannot force an applicant to provide an Upstream Drainage connection that deviates from BSD 8111.





BSD 8111 requires the stormwater pipe to be 600mm from the boundary, not traverse the front yard of a property.

This case was upheld 3 times in S81 applications in 2024. The dogleg plan was therefore upheld, as well.

**Law broken by Corrigan** - BSD 8111

**On 30-4-25, Judge Williamson KC ordered Susan Hedge and Council to supply the standard easement document to Manteit.**

**The Council employee easement corruption ended after 7 months.**

**Judge Williamson KC**

## Court 30-4-25 Easements

Then that leaves So condition seven is about the grant of easements. What do you want to say about that?

David Mantelt

Well, that'll have to be left in, Your Honour.

**Judge Williamson KC**

As in, you're conceding it should form part of an approval?

**David Manteit**

Oh, yeah, I've never seen it. I've been asking for it, 28 questions, written down on the 1st of October, emailed to seven people, but never received it. It'd be nice to know what's in there. It's supposed to come from city legal, but it never, ever has come. I don't know what's in an easement document.

**Judge Williamson KC**

**30-4-25**

Because suspect what we find is that as a matter of practice, or at least my experience many years ago, Mr. Monty, is that when a plan of subdivision is ready to be sealed, or on its way for sealing, the Council are provided with as constructor drawings and a plan of subdivision. And then at that stage, with the benefit of where the pipes are.

**David Manteit**

I live on one now. I live one metre away from the backyard. We put the..

**Judge Williamson KC**

No, no, you're not listening to me. It's a matter of timing.

**David Manteit**

But the timing is, I need it now to run my next case, Your Honour. Am I going to be able to send an email tomorrow and say, give me the easement? Because I want to know if it's going to go this way, that way in my front yard. Please, where can I get that?

**Judge Williamson KC**

Because what I'm leading to is, the easement that would be granted in favour of council. I suspect it has long had standard conditions or standard terms of the easement and the actual location of the easement.

**David Manteit**

Fantastic, where are they since 1st of October? But those standard terms need to be adjusted to reflect. Exactly, that's why I need them now. I need that, it's in file, 1st of October, 28 questions. It's on the website, 28 questions.

I don't know what's in there. I can't design this project here if I don't have that standard before we change the standard. I don't know why we can't get that from city legal who was sitting here.

**Judge Williamson KC**

**30-4-25**

Because you understand the easement has two parts to it at least. you'd need to know where the underground.

**David Manteit**

It has the survey plan to be lodged, and it has the wording of the easement documented.

**Judge Williamson KC**

Okay. Please don't interrupt me.

**David Manteit**

Oh, you asked me a question, right?

**Judge Williamson KC**

No, I didn't. You said, do you know what that means? Oh, okay. Sorry. Strictly correct. Again, rhetorical. It has two... It has an easement document. An easement, grant of an easement, has integers to it. One of them is the location of the easement.

But here that's to go to the underground drainage and access over the drainage infrastructure provided for.



**David Manteit**

Mystery. Yeah

**30-4-25**

**Judge Williamson KC**

And you know why it's a mystery? Because you haven't designed it. Oh whoops.

**David Manteit**

But I can't design it unless I know what's in it Your Honour

**Judge Williamson KC**

No no you can because what the council have told you is there's an underground they want an easement in relation to your underground drainage, no less than 900 millimetres.

**David Manteit**

But Mr Corrigan says I've got to be driving over it twice. I don't know what it says. Is it this deep? Is it volumetric? Can you plant grass? Can you put concrete on top? I don't know. I don't know how I can incorporate that shoved up to a retaining wall. It says in section 4.7, it says you must look at the easement terms. That's the law, section 7.47. Look at the easement that's not contrary to the easement terms. I haven't got the easement terms. I don't know what's contrary.

**Judge Williamson KC**

Mr. Monty, you told me you're a developer, and you've developed other land which has been subdivided. As part of that experience, have you happened to come across easement documents from the council for drainage purposes?

**David Manteit**

I've got four easements one metre away from my breakfast table, which I have managed quite well by getting those documents in the past, but they don't seem to be forthcoming as of 1 October before any court cases. I can't design anything without that. And city legal, in the conditions, they're the ones that draw it up. They've got the responsibility. Why can't you send me down a standard easement to start? That's the way we do things. It's not my responsibility to draw it up, but there's no use getting to the subdivision. We go through this all over again. I'm sorry, we haven't got the easement. No, we're not. No, we're not. We don't know.

**Judge Williamson KC**

Just shh, quiet. This is what we're going to do. Where's Hedge? I have an idea, unorthodox as it might be, is it at all possible that your instructing solicitor could provide to Mr. Monty the standard terms of council's easements which involve underground drainage and access? bearing in mind that it would be standard terms, it's not intended to be final and subject to detail that is to follow in the form of survey plans and design detail.

**Susan Hedge**

I understand the question, I'll get some instructions.

**Susan Hedge**

I understand the question, I'll get some instructions

**30-4-25**

**David Manteit**

which has corrupted our defence because we can't use it as a defence because we haven't got the information contrary to the easement terms. Can't use that as a defence, because we haven't got the easement. So we haven't been able to give a full case on zone of influence because section 747, it says, you must not do anything that's contrary to the easement terms. We cannot, we don't get the easement terms. So we can't argue our case on that. Are you still challenging condition seven or not? No.

**Judge Williamson KC**

So you're not challenging?

**David Manteit**

No. But I'm going to need it tomorrow to start the next case and the next application.

Well, I'm trying to get it for you as quickly as possible. And we're going to go through the same thing, wait nine months.

**Susan Hedge**

The answer is that we can provide it in standard terms only, not a people spoke document by close of business tomorrow.

## **Court extracts above 30-4-25**

### **Other cases of front yard stormwater**

#### **This is an example of Upstream Drainage in 85 Rowe Tce Darra.**

This has now been completed.

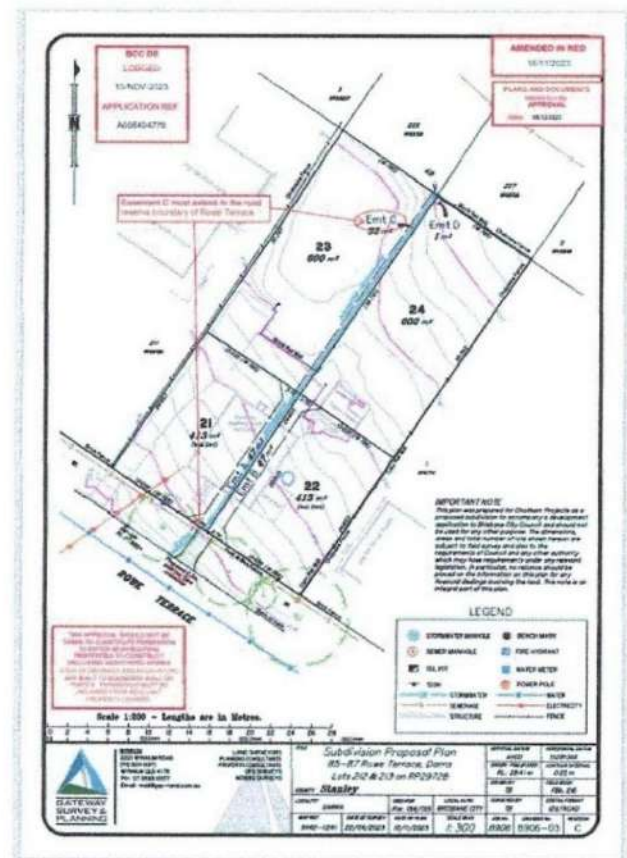
85 Rowe Tce Darra is a case of a 4 lot subdivision, being 2 lots at the rear and 2 lots at the front.

There is a 3.5m wide easement in the middle. The Upstream Drainage easement has been placed/overlayed in the driveway easement.

There is no traversing of the front yards (outside the driveway easement) with Upstream Drainage.

There is no known case of approved plans in any other Council approval where an Upstream Drainage easement and pipes have been placed in someone's front yard,



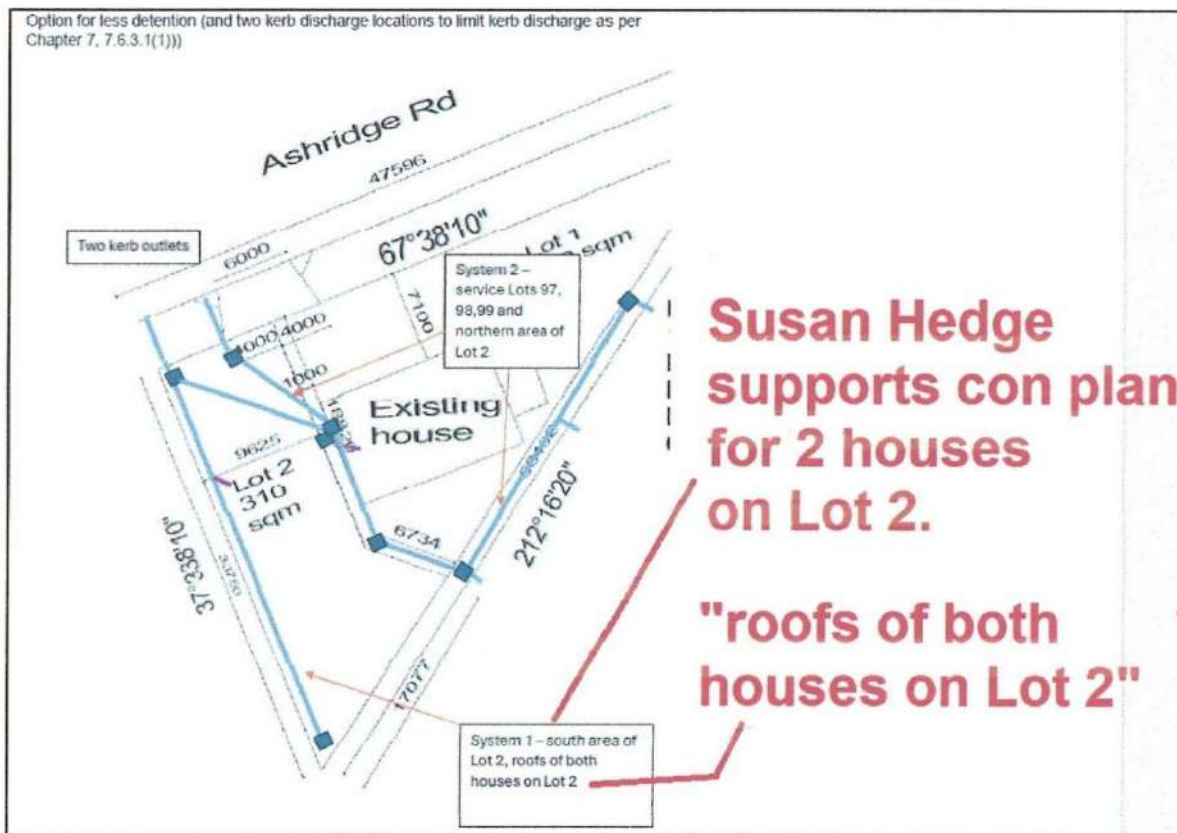


**Above - 85 Rowe Tce Darra approved 6/12/23.**

In my filed audit of 412 approved Brisbane City Council cases, filed around 25/1/25, there were no Upstream Drainage cases that provided plans for an Upstream Drainage and stormwater easement to cross the front yard of a property.

**Schrinner and Freeman need to advise the applicant and the public why they have attempted to allegedly thwart by any means possible, the development application, including blocking of services to the development.**

## 7) Corrigan proposes to build 2 houses illegally on one lot.



**Corrigan attempts to fool Judge Williamson KC by building 2 houses on one lot.**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.

**Law broken cause by Corrigan to owner** - S163 of Planning Act 2016. Fine of \$750,000 to the owner.

## 8) Corrigan uses illegal rainwater tanks to hide flooding

Rainwater tanks are illegal as per PSP S 7.5.3(6)

Susan Hedge advised the Court on 29-4-25 to Judge Williamson KC that Council refused to allow the placement of the condition of rainwater tanks S7.5.3.(6) in the approval.

**Corrigan uses illegal rainwater tanks in neighbour's yards to fool the Court, by reducing the flood flows onto 128 Ashridge Rd Darra.**



### 7.5.3 General requirements

- (1) The design of stormwater detention and retention systems is to refer to QUDM section 5.0 for all design elements including but not limited to embankments, spillways, low and high flow outlets, freeboard, basin grade and scour control.
- (2) Stormwater detention is offline to existing creeks/flow paths and external catchments.
- (3) Where an online system is proposed, it must provide regional benefits to flow reduction and be designed for ultimate catchment development. These basins will require incorporation of natural low flow channels, riparian vegetation and use of weir outlets (no piped low flow outlet) to promote fauna movement and reduce likelihood of outlet blockages.
- (4) Where stormwater from any public asset such as a road reserve is directed into a stormwater detention system, these detention systems must be located within public land such as a park or

drainage reserve, but not within road reserves. Only above-ground detention storages will be permitted in Council-owned lands. Tanks in public roads will not be accepted.

- (5) Above-ground detention basins should be integrated with water quality treatments by locating the detention storage requirement above the water quality extended detention depth.
- (6) Council will not support the installation of on-site (lot-based) stormwater detention facilities in a residential subdivision on each freehold lot as there is no provision to adequately ensure these facilities are protected or maintained into the future.
- (7) Using stormwater detention tanks in commercial or industrial developments will be permitted where located on lots or within privately owned roads/driveways. Similarly, tanks could be used within roads/driveways owned by community title for residential developments.

QUDM also states that rainwater tanks are not used in residential.

### 5.4.2 On-site detention systems **QUDM**

There are generally three design standards set by regulating authorities, they are:

- A specified minimum site storage requirement (SSR) and permissible site discharge (PSD) relative to either the site area, land use, or the change in impervious area.
- A permissible site discharge for the specified design storm frequency with no minimum storage volume specified.
- A requirement not to exceed pre-development peak discharge rates for a range of design storm frequencies.

The first two design criteria are often adopted by local governments following the development of a regional flood control strategy, Master Drainage Plan, or Stormwater Management Plan.

Most small on-site detention systems incorporate underground tanks. When appropriate soil and groundwater conditions exist, some underground tanks can be converted into infiltration systems. Above-ground stormwater detention tanks are rarely used on single residential properties because of the risk of the tanks being converted solely to rainwater tanks.

**Above-ground stormwater detention tanks are rarely use on single residential properties**

## QUDM

**Law broken by Corrigan - PSP S7.5.3.6**

**Law broken by Corrigan - S5.4.2 QUDM**

**/Why did Schrinner and Freeman pay for and instruct such a fool to use break laws and using illegal rainwater tanks ?**



**This is what the back yard of the rear lots would look like to hold back floodwaters for one rear lot.**

**Freeman and Schrinner supported, paid for and proposed these rainwater tanks for a Brisbane ratepayers backyard.**





**Manteit subdivision plan for fully developed. Legal contours 2002, as shown on Council's website.**

**This takes an 8 year old to prepare in 30 minutes.**

### 7.5.3 General requirements

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- (7) Using stormwater detention tanks in commercial or industrial developments will be permitted where located on lots or within privately owned roads/driveways. Similarly, tanks could be used within roads/driveways owned by community title for residential developments.

PSP S7.5.3 (6) states that Council will not support rainwater tanks on each freehold lot.

Why would Corrigan risk his licence by the Board of Professional Engineers Queensland in promoting illegal structures? Naturally this could allegedly end up in an alleged jail sentence for Corrigan and possibly the rear lot owners.

Corrigan wants the rear neighbours to install illegal rainwater tanks to con the Council when they want to subdivide their property.

Corrigan water tanks required are estimated by Manteit to be produce 651,600 litres of flooding per hour, based on 181 L/s.

The owner of 128 Ashridge Rd Darra has no way to stop flooding when rainwater tanks are full.

In addition, there is no guarantee that these tanks are readily available for flood protection, as the owners will keep the water for watering the grass.

This in turn makes the ground wetter, and worse conditions for flooding.

**Law broken by Corrigan - PSP S 7.5.3 (6)**



**Low broken by rear lot neighbours** - S163 Planning Act \$751,050 for structures if built without a building permit.

**PSP S 7.6.1 (6) - Rainwater tanks do not negate the requirement for a lawful point of discharge for development.**

(6) The provision of stormwater detention does not negate the requirement for a lawful point of discharge for development. Detention systems do not manage nuisance flows and may concentrate water that would have otherwise sheet flowed across a site boundary, often have high outlet velocity and will regularly release stormwater over extended periods of time. The provision of storm water detention is not to result in uncontrolled scour, ponding and nuisance to adjacent properties that would have otherwise not been experienced under existing conditions.

**PSP S 7.6.1 (6) - "*Rainwater tanks do not negate the requirement for a lawful point of discharge for development.*"**

***"Detention systems do not manage nuisance flows."***

**Corrigan failed to mention S7.6.1(6) in his report.**

**Law broken by Corrigan** - S7.6.1.6.

**9) Incompetent engineering by Corrigan, using one zero, two zeros and three zeros in the two hydraulic plans.**

Corrigan was so proud of himself using 3 zeros. He said his peers only used 2 zeros.

Another alleged fraud to add to the list.

**Corrigan is very proud of three zeros. 28-4-25**

Some engineers would record that as just the two decimal places. I happen to do it to three there. Anyway, it says IL 36.625, and then that pipe has a fall on it to the stub that joins the stub to lot 99, and there's an arrow pointing there and the IL is at 35.39. So there's a fall... These levels are expressed as a... as what's known as a reduced level.

**"Some engineers would record that as just the two decimal places."**

# So what's this, Corrigan?

**Susan Hedge has zero idea of why the winemaster uses zeros all over the place.**

Upstream pit				
Pit	IL	SL	Depth	
Stub Lot 97	36.625 <b>3</b>	37.3 <b>1</b>	0.675 <b>3</b>	
Stub Lot 98	36.325 <b>3</b>	37.0 <b>1</b>	0.675 <b>1</b>	
Stub Lot 99	35.39 <b>2</b>	36.0 <b>1</b>	0.6 <b>1</b>	
4	35.36 <b>2</b>	36.0 <b>1</b>	0.6 <b>1</b>	
5	35.305 <b>3</b>	36.5 <b>1</b>	1.19 <b>3</b>	
6	35.125 <b>3</b>	35.8 <b>1</b>	0.675 <b>3</b>	
7	35.475 <b>3</b>	36.15 <b>2</b>	0.675 <b>3</b>	

**Susan Hedge winemaster witness 1 zero 9 times  
2 zeros 3 times  
3 zeros 8 times**

**Corrigan was so proud he used 3 zeros sometimes.**

Corrigan the goldfish is so dumb, he didn't even know he had zeros all over the place.

**Why did Lord Mayor Schinner and CEO Dr Freeman use your ratepayers money to pay for this garbage allegedly fraudulent winemaster witness?**

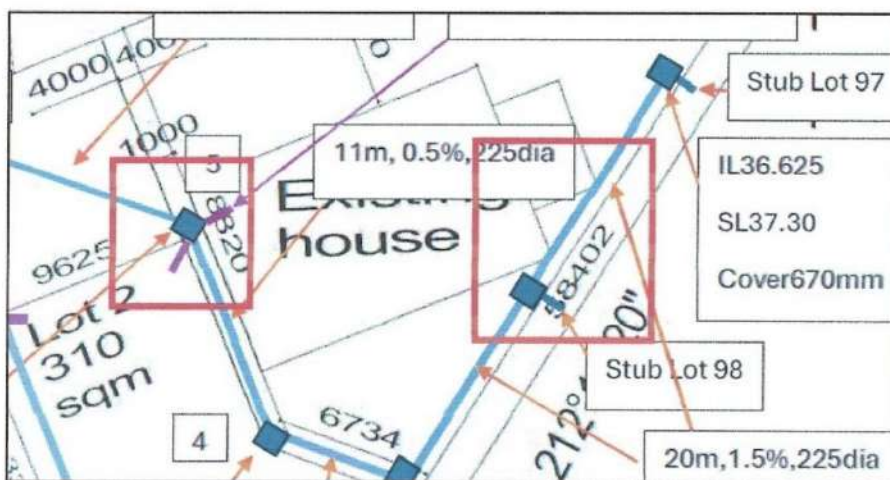
**What's the point?**



**Corrigan allegedly made these intentional errors to fool Judge Williamson KC and soak up time in Court.**

**Law broken** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a registered professional engineer

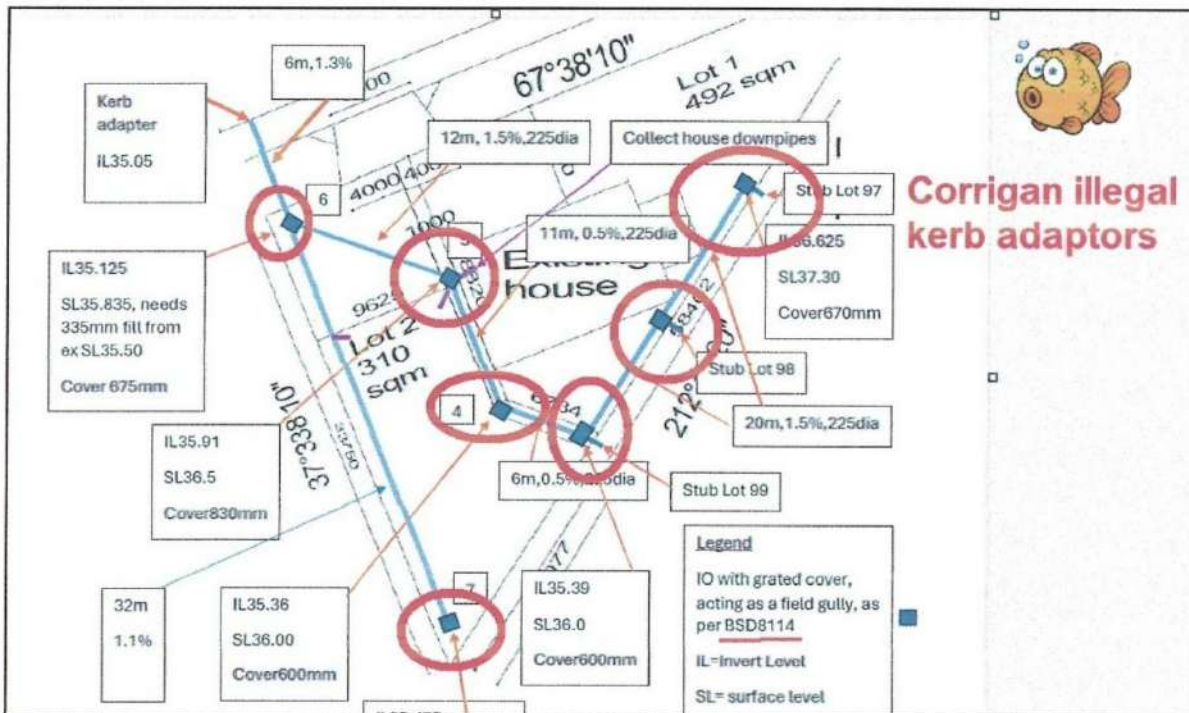
**10) Corrigan intentionally placed hydraulic pipes immediately beside the existing house, which will cause the requirement of the house to be demolished, to seal the plan, in order to fool Judge Williamson KC and the Court.**



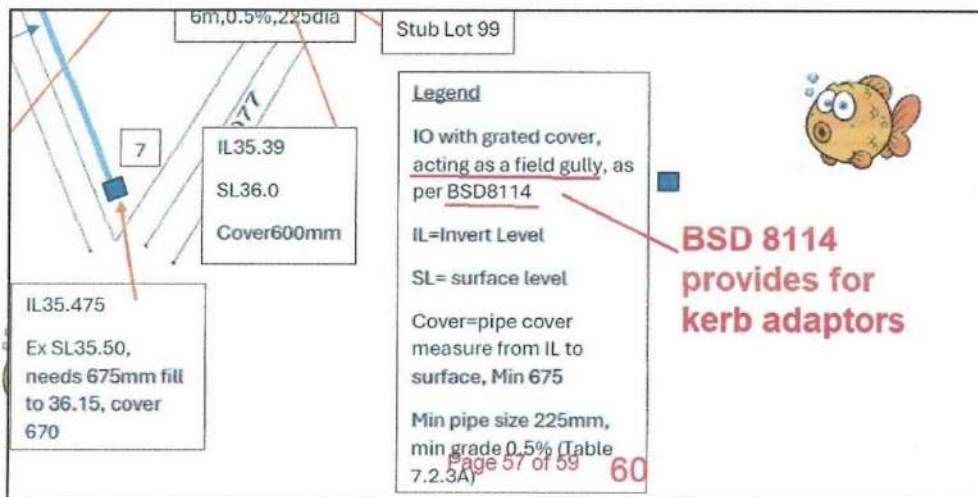
**Corrigan demolition of house**

**Law broken** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a registered professional engineer

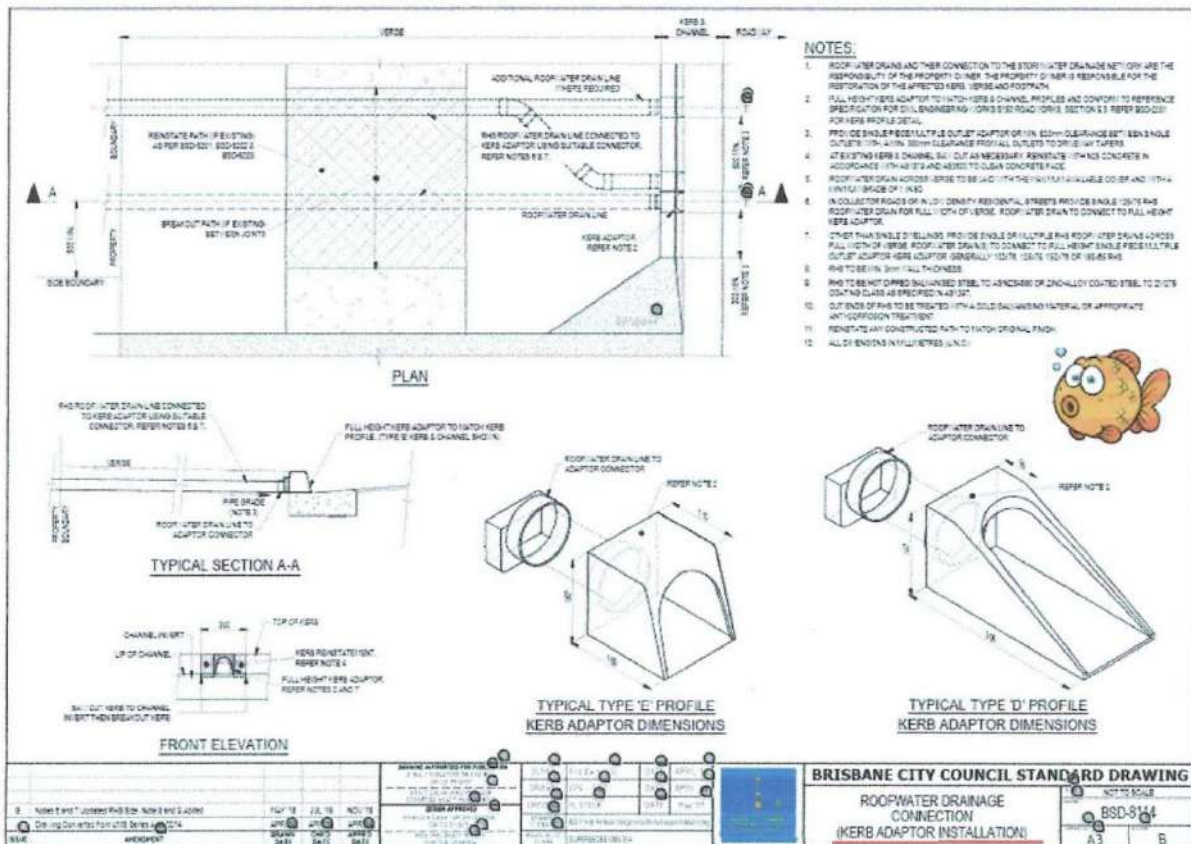
**12) Corrigan intentionally used 7 fake kerb adaptors "BSD 8114" instead of legal pits 600\*600 as per BSD 8091, in order to allegedly fool Judge Williamson KC and the Court.**



Corrigan used fake kerb adaptors (BSD 8114)





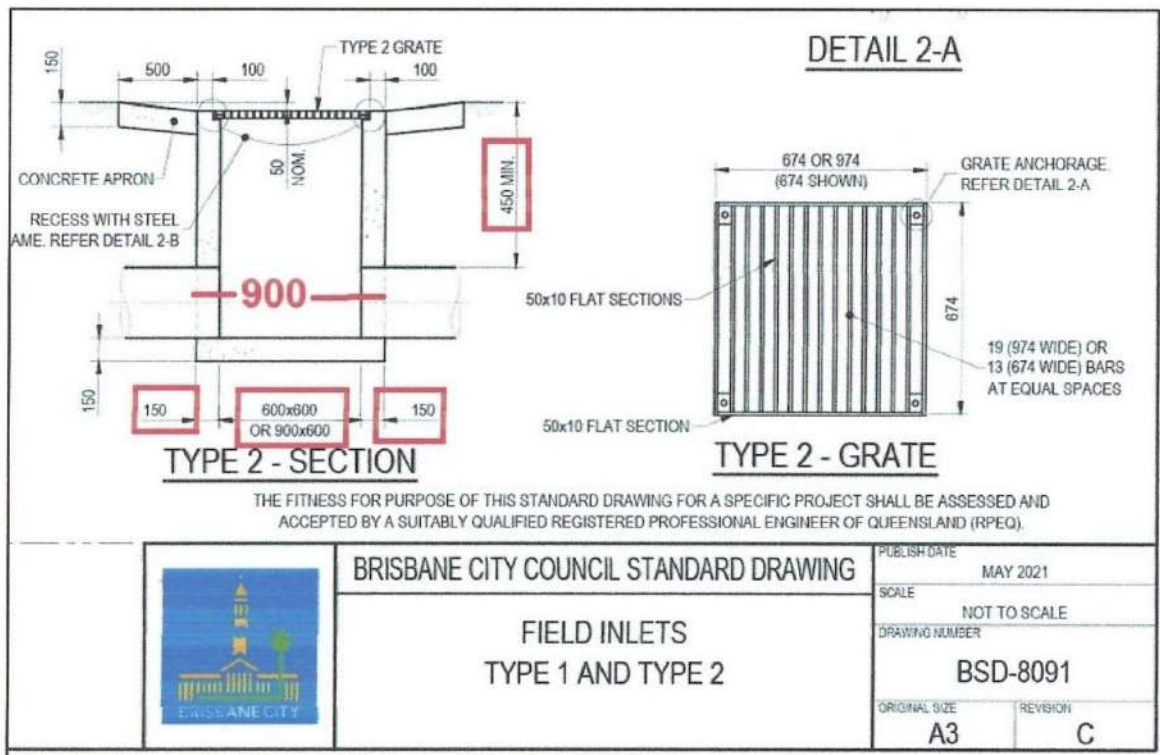


**Corrigan - BSD 8114 Kerb adaptors - they are not stormwater pits**

**Lord Mayor Schinner and CEO Dr Freeman used your ratepayers money to pay for seven kerb adaptors in your backyard.**

**Law broken by Corrigan - BSD 8114**

**Law broken by Corrigan - BSD 8091**



**BSD 8091 - legal Council field inlets. Corrigan used illegal kerb adaptors.**

**Corrigan refused to use the legal field inlets above in order to allegedly deceive Judge Williamson KC. Corrigan had no fear of breaking Council laws.**

The minimum width for a legal stormwater inlet is 900 mm wide. This requirement means that the foundations of the wall would have to be removed, causing the house to fall down.

The minimum depth is 900mm. The sewerage has no option but to be installed below that.



**Judge Williamson KC**

**30-4-25**



This is about putting propositions to Mr Corrie. What is the proposition that you wish him to comment on?

**David Manteit**

With knowledge now of a big concrete pit, how would you think that that would be able to get all the other services in that pathway?

**Corrigan**

That pit that's on BSD 8091, that's the pit that's used where there's going to be vehicular traffic, so the upper one with the grate is in a driveway, which is as per page 34 of 85 Rowe Terrace Darra.

The lower version is where it's in a park where, for example, the mowers are going to be running over it, mowing the grass. In the case of the pathway area between the existing house and the proposed house, there won't be a vehicle able to traverse that path.

So I don't think BSD 8091 would apply. And you'd go to one of the lighter I mean, the one I suggested was BSD 8114.

That's the first point. **Corrigan still wants a kerb adaptor to carry a 225mm pipe and 450 cover**

**David Manteit**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, of a registered professional engineer

**David Manteit**

Sorry, just getting back to the pathway. So you think it would be a plastic something that would go in the pathway, is that right? A plastic...

**Corrigan** "They come in plastic""You're asking me about a very developed , detailed design"

Well, see, again, you're asking me about a very developed, detailed design. And my job was to look at an in-principle, indicative design that shows that there is a solution here, but it's going to have to be worked through. So the precise choice of... what type of pit. Now the pits come in ones that you can run a vehicle over, ones that They've got no heavy traffic on them. They come in plastic. They come in concrete. Some of them have got plastic grates. Some of them have got cast iron grates. Whatever loading you need, there's a choice of them.

**Corrigan** **Corrigan doesn't know where to put his kerb adaptors**

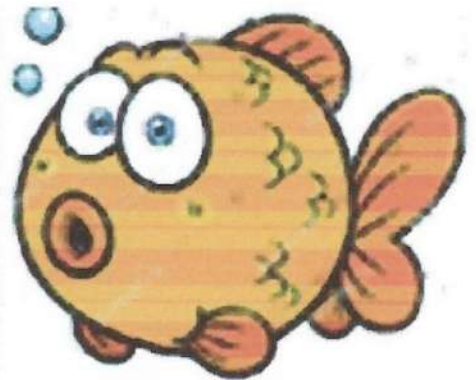
No, it's a schematic representation that shows that you may need multiple curb outlets and you may have to split the pipe system into two in order to achieve the curb outlet that's below the maximum.

Now precisely where you may choose to put it is going to depend on your detailed overall design/

**13) Corrigan promoted a fake Master Plan. There is no Brisbane City Council definition of a stormwater master plan.**

There is no example in any Town Planning approvals or City Plan of a Master plan being required for any 2 lot subdivision.

**14) Corrigan illegally uses fill when all fill conditions, 12,17,18 had been removed by Council on 31/1/25.**



**13) Corrigan wants to fill my front yard by 335mm.**

That means raising the whole block of land by 335 mm.

The fact is, that this filling does not change the fact the pipes are still flooded.

**14) Corrigan use of illegal townhouses for fake stormwater calculations in order to blatantly understate rear lot flooding by 60-100%.**

The definition of multiple dwellings does not include 2 townhouses. It must be 3 or more.

**A multiple dwelling is minimum 3 dwellings, not two dwellings.**

<p><u>Multiple dwelling</u></p> <p>Editor's note—The use term is defined in the <a href="#">Planning Regulation 2017</a> - Regulated Requirements</p>	<p>Multiple dwelling means a residential use of premises involving <u>3 or more dwellings</u>, whether attached or detached.</p>	<p>Apartments, flats, units, <u>townhouses</u>, row housing, triplex</p>
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**Law broken by Corrigan** - alleged fraud



**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory Conduct, of a professional engineer

### 15) Corrigan intentionally uses half houses and townhouses to fool the Court and the public.

Calculation of storm discharge for various options			
Storm discharge (m3/s) for catchment options			
Catchment Description	A	B	C
Upstream catchment AEP 5% discharge from townhouse roof 180m2	180m2 one townhouse (0.018ha), assume house roof on 1SP296077 discharges to Ashridge Rd via pipes	180m2 half of townhouse (0.009ha)	1.5 x 180m2 (0.027ha)+Main house (part) and shed Lot 97 = 166m2 Total roof 0.044ha
Upstream catchment AEP 39% discharge	0.056ha	0.016ha	0.102ha
Total Catchment AEP 5% discharge from upstream townhouse roof 180m2 plus roofs on subject lot namely 115m2 proposed roof and 143m2 existing house	One <u>townhouse</u> plus <u>half existing house</u> on subject lot 180m2+71m2=251m2	<u>Half a townhouse,</u> <u>half existing house,</u> all of proposed house on subject lot 90m2+71m2+115m2 = 276m2	Same as above 0.044ha

Corrigan supplied stormwater calculations for -

- Half a house.
- Half a townhouse



In Australia we call that being a half wit.

The Lord Mayor and Dr Kerry Freeman is paying your rates monies for Corrigan to be a half wit.

Corrigan thinks providing stormwater provision for a half house is legal.

**Law broken by Corrigan** - alleged fraud

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory Conduct, of a registered professional engineer

## 16) Corrigan forces the rear neighbours to build illegal townhouses

Total Catchment AEP 5% discharge from upstream townhouse roof 180m <sup>2</sup> plus roofs on subject lot namely 115m <sup>2</sup> proposed roof and 143m <sup>2</sup> existing house	One <u>townhouse</u> plus <u>half existing house</u> on <u>subject lot</u> 180m <sup>2</sup> +71m <sup>2</sup> =251m <sup>2</sup>	<u>Half a townhouse,</u> <u>half existing house,</u> <u>all of proposed</u> <u>house on subject</u> <u>lot</u> 90m <sup>2</sup> +71m <sup>2</sup> +115 m <sup>2</sup> = 276m <sup>2</sup>	Same as above 0.044ha
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Corrigan promoted the rear neighbours to break many Council laws, by building illegal townhouses.

### 163 Carrying out assessable development without permit

- (1) A person must not carry out assessable development, unless all necessary development permits are in effect for the development.

Maximum penalty—

- (a) if the assessable development is on a Queensland heritage place or local heritage place—17,000 penalty units; or  
(b) otherwise—4,500 penalty units.

**Law broken by rear lot owners caused by Corrigan** - S 163 Planning Court fines issued by Magistrates Court and Brisbane City Council of \$755,050 for building structures that are not approved.

## Corrigan forces the Killarney Ave owners to build a massive retaining wall to achieve lawful point of discharge.

- b. Worst case upstream development assumed to be two townhouses per lot, each 180m<sup>2</sup>, the townhouse towards Killarney Ave to discharge to Killarney Ave, the rear townhouse to discharge towards the subject lot. **Corrigan**

The townhouse towards Killarney Ave to discharge to Killarney Ave.

The land drops from the front boundary over say 20 metres, to the rear by about 2 metres. Therefore Corrigan forces the neighbour to obtain lawful point of discharge by building a tiered retaining wall, maximum 1 metre in height and wide.  
(Subdivision Code).

There are currently no houses on that side of the street that use the kerb and channel for roofwater. There are zero kerb adaptors on that side of the street.



**Law broken by Corrigan** - Alleged fraud to force Killarney Ave owners to build 2 metre high retaining walls.

Why does Schrinner and Freeman promote an engineer that forces an owner to build retaining walls in order to complete a subdivision? Why does Schrinner and Freeman promote this fool?

**Law broken by rear lot owners caused by Corrigan** - S 163 Planning Court fines issued by Magistrates Court and Brisbane City Council of \$755,050 for building structures that are not approved.

### 17) Corrigan states -

**"Worst case upstream development assumed to be two townhouses per (rear) lot."**

Corrigan and Susan Hedge have allegedly intentionally misled Judge Williamson KC and the public into believing that 2 townhouses is legal.

#### **Corrigan false statements** **Stormwater design assumptions**

- a. Level II drainage as per QUDM Section 7.13.2, namely pipe system to convey the greater of 5% AEP (1/20) roof discharge or 39% AEP (1/2) discharge of the roof plus allotment.
- b. Worst case upstream development assumed to be two townhouses per lot, each 180m<sup>2</sup>, the townhouse towards Killarney Ave to discharge to Killarney Ave, the rear townhouse to discharge towards the subject lot.

**Corrigan false statement of worst case scenario .... Two townhouses per lot. Understating flooding by 60- 100%**

**Who paid for Corrigan ? Freeman or Schrinner? Ratepayers money paid for this garbage.**

The land is zoned LMR3, which allows multiple dwellings.

Two townhouses is illegal. Susan Hedge know this, but continued to promote breaking of Council laws.

Brisbane City Council definition of a multiple dwelling provides for a minimum 3

dwellings. Corrigan says worst case is two townhouses, which is illegal in itself.

<p><u>Multiple dwelling</u></p> <p>Editor's note—The use term is defined in the <a href="#">Planning Regulation 2017</a> - Regulated Requirements</p>	<p>Multiple dwelling means a residential use of premises involving <u>3 or more dwellings</u>, whether attached or detached.</p>	<p>Apartments, flats, units, <u>townhouses</u>, row housing, triplex</p>
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Susan Hedge screamed and yelled to Judge Williamson KC stating that this witness is very very believable (transcript). Dr Freeman and Lord Mayor Schinnerer paid your ratepayers money for this lying garbage.

The list of Corrigan lies is endless. The list of ratepayers money being wasted is endless.

#### 18) Corrigan stated another lie that he considered the Reel Planning Court

##### Stormwater catchments

- 9.4. In the absence of analysis of upstream catchments by the Applicant, I devised indicative catchments for the subject lot and upstream lots as set out in paragraph 8.6 above. I considered potential upstream development and adopted the town planning report of Keiran Ryan of Reel Planning at sections 5.9 – 5.11.
- 9.5. The existing lots upstream have a size of 1,012m<sup>2</sup> and it is likely that a rear lot is created with a townhouse located on the new lot. Hence, a development upstream would consist of each existing lot (relevantly Lots 97,98 and 99) containing two townhouses or the existing house plus a townhouse.

**Corrigan lies again. "and adopted the town planning report of Keiran Ryan of Reel Planning at sections 5.9 - 5.11"**

**"containing two townhouses "**

**"or the existing house plus a townhouse"**



**Ryan 5.9 - 5.1**

Ryan didn't mention "three" townhouses. Corrigan seemed to rely on his own town planning ability.

Multiple dwelling Editor's note— The use term is defined in the <i>Planning Regulation 2017</i> - Regulated Requirements	Multiple dwelling means a residential use of premises involving <u>3 or more dwellings</u> , whether attached or detached.	Apartments, flats, units, <u>townhouses</u> , row housing, triplex	Rooming accommodation, dual occupancy, duplex, granny flat, residential care facility, retirement facility
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**Multiple dwelling is 3 or more dwellings, whether attached or detached.**

**Reel town planning -**Upstream Properties

- 5.9 The Respondent's Reasons state that the two lots identified as being upstream/upslope of the subject site are Lots 98 and 99 on RP29723 (40 and 48 Killarney Avenue, Darra). I note that the report of Mr Corrigan confirms this and also identifies that Lot 97 (50 Killarney Ave) is upstream. Lots 98 and 99 are each 1,012m<sup>2</sup> in area and Lot 97 is 1,176m<sup>2</sup> in area. Each of the sites share the town planning context of the subject site, as summarised in Table 2 and each contains a single dwelling house constructed near the road frontage, with the balance of the site largely vacant.
- 5.10 In my opinion redevelopment of these properties is likely, having regard to their existing use, their size and the town planning context applicable to them under City Plan. Redevelopment may include (for example):
- (a) Multiple Dwelling (noting that development up to 3 storeys is anticipated via code assessment)
  - (b) Reconfiguring a lot (noting that subdivision where resulting in lots 180m<sup>2</sup> or greater is anticipated via code assessment)
- 5.11 The extent of impervious area that might occur on lots 97 to 99 will depend on the form of development (e.g. apartments versus townhouses versus conventional houses) which is presently unknown. For example, depending on the proposed design, the upstream catchment might be used as deep planting or landscaping (resulting in minimal additional stormwater) or be fully sealed (resulting in substantial additional stormwater). For this reason I would rely on the development engineer to determine the amount of additional stormwater that should be assumed.

**Ryan witness report for trial 28-4-25**

Corrigan allegedly lies again and again. Corrigan's alleged lies are endless.

**Ryan never stated "containing two townhouses" or "existing house plus a townhouse" in his report S5.9 - 5.1.**

Corrigan intentionally attempted to deceive Judge Williamson KC to understate rear lot flooding, yet again. Susan Hedge yelled and screamed(transcript) to Judge Williamson KC to believe this alleged corrupted engineer.

Why is the Lord Mayor and Dr Freeman paying your rates money to allegedly fool Judge Williamson KC and the public?

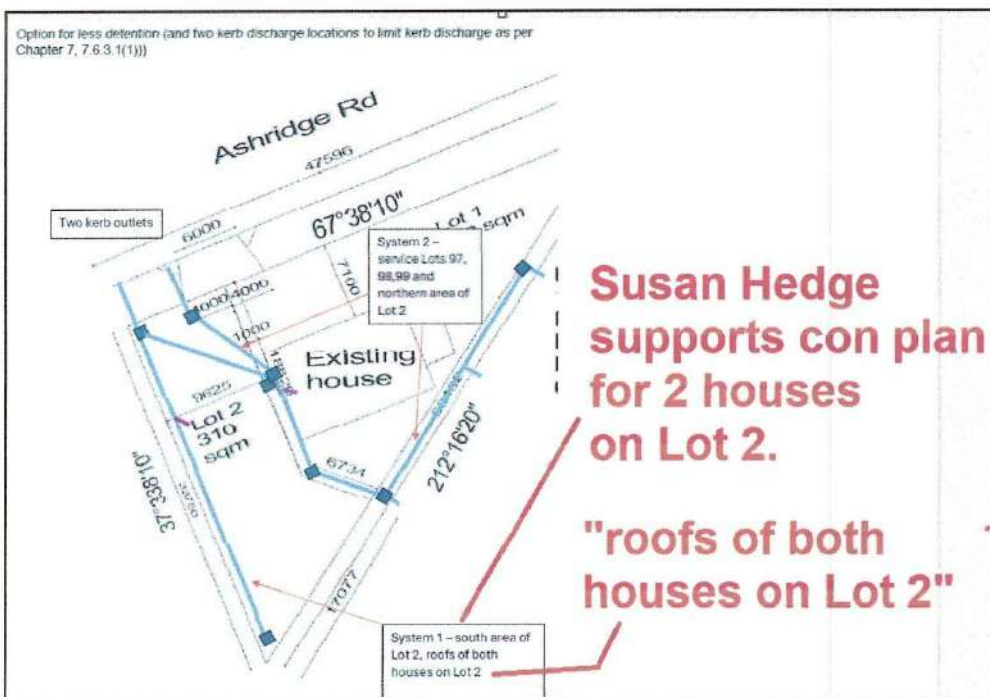
Ryan never mentioned "two townhouses"

Corrigan, the CEO (or whoever BCC employee instructed the Corrigan report and Susan Hedge continue to attempt to understate and hide nuisance flooding from the rear lots, in any way that they can.

**Law broken by Corrigan** - alleged fraud

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory Conduct, of a professional engineer

## 20) Corrigan plan for 2 illegal houses



**Law broken by Corrigan** - alleged fraud

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, of a registered professional engineer



**Law broken by owner - S163 Planning Act \$751,000**

**19) Corrigan uses illegal "likely outcome", instead of Council laws."**

No Council assessment manager makes information requests using the phrase "likely outcome"

1.4. I note the report of Mr Kieran Ryan, the Respondent's town planner, which states that the most likely development outcome for the newly created lot would be a single dwelling house with a maximum site cover of 60%. Given the location of the driveway crossover and the constraints of the site (size, shape, depression in back corner), the proposed new dwelling location identified on the plans seems the most likely location for a new dwelling.

**20) Corrigan used two illegal townhouses of 360sqm instead of Reel Planning site cover of 60% +5-10% additional for Small lot code allowances.**

Once again Corrigan continues to hide flooding.

**Law broken by Corrigan - fraud**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory Conduct, of a registered professional engineer

Why did Schrunner and Freeman pay your rates money for this garbage?

**21) Corrigan wants to fill the low surface area of the lot in the Southwest corner**

1.6.3. Condition 17 – provide stormwater infrastructure within the subject lot generally in accordance with marked up plan SK01. This plan depicted pipe drainage for future development of Lots 98 and 99 to the east, drainage to the low surface area of the lot in the southwest corner, discharge to Ashridge Road.

Corrigan is a very confused person. Corrigan makes a false statement.

Corrigan "this plan (SK)1) depicted..... drainage to the low surface area of the lot in the southwest corner, discharge to Ashridge Rd."

Corrigan and Susan Hedge allegedly intentionally placed this statement in his report to intentionally fool Judge Williamson KC and the public.

**Law broken by Corrigan** - fraud

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act  
Unsatisfactory Conduct, of a professional engineer

## 22) Corrigan states that the construction of a new house should be addressed in a stormwater master plan.

3.4. The construction of a dwelling on the subdivided lot on the subject site will create a barrier to stormwater flow across the subject site and hence will change the stormwater discharge characteristics - namely flow will be diverted to the south of the dwelling and, unless stormwater infrastructure is provided, will result in concentration of flow into the adjacent Lot 1. This and the discharge from the upstream sites along with drainage from the existing and any new dwelling should be addressed in a stormwater master plan for the development.

This is again a false statement, allegedly fraud.

There is no requirement to build a new house.

**Law broken by Corrigan** - fraud

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act  
Unsatisfactory Conduct, of a registered professional engineer

### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
- (2) When land is developed, the roof and surface-water run-off from that land and any external catchment (through the development site) must be discharged to a lawful point of discharge, being:
  - (a) where the location of the discharge is under the lawful control of Council, being:
    - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
    - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.



**Law broken by Corrigan - 7.6.1 (1)**

**Law broken by Corrigan - 7.6.1 (2)**

## 24) Discharge to kerb and channel must be limited to 30 l/s.

Flow velocity based on Civil Works conservative 60% roof cover.

**Lot 98**

**Lot 99**

38 litres per second = >30 l/s

38 litres per second = > 30 l/s

**Civil Works report 31-3-25**

Catchment	Q <sub>1</sub> (m <sup>3</sup> /s)	Q <sub>2</sub> (m <sup>3</sup> /s)	Q <sub>5</sub> (m <sup>3</sup> /s)	Q <sub>10</sub> (m <sup>3</sup> /s)	Q <sub>20</sub> (m <sup>3</sup> /s)	Q <sub>50</sub> (m <sup>3</sup> /s)	Q <sub>100</sub> (m <sup>3</sup> /s)
Existing Site	0.014	0.019	0.026	0.031	0.038	0.049	0.054

**Civil Works show a flow velocity at kerb of conservative 38 litres per second for 1012 sqm for lot 98 and 99.**

**Corrigan agrees that the kerb adaptor only allows 30 l/s.**

9.11.4. Civil Works Engineers goes on in the report to calculate storm discharge flows from Lots 98 and 99. I do not disagree with the input parameters of the calculation (set out by Civil Works Engineers below Table 1 on page 4 of the Civil Works Report). I do not disagree with the requirement that each kerb outlet must be limited to 30L/s discharge.

### 7.6.3.1 Connection to kerb and channel

- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to [BSD-8113](#)).
- (3) Only approved full-height kerb adaptors, complying with [BSD-8114](#) are permitted. The kerb adaptors must be placed in a location where service pits on the footpath will not conflict with the future pipe location.
- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

Above - Level III drainage is only permitted if the total discharge from the development including any external catchment does not exceed 30 L/s.

**Law broken by Corrigan - S7.6.3.1 (2) .**

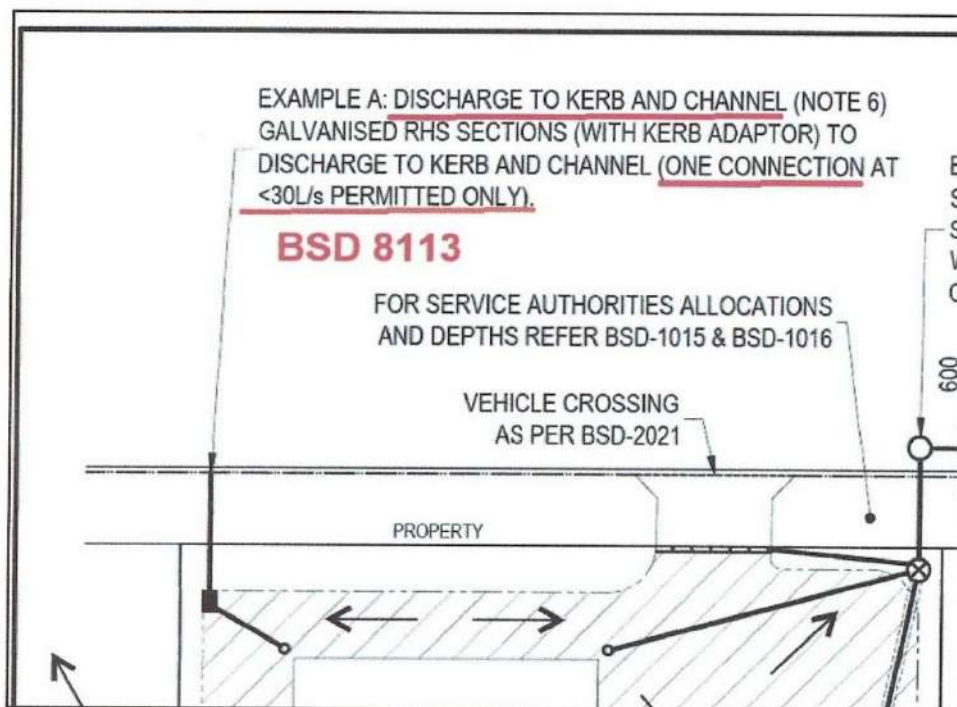
**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a registered professional engineer

### BSD 8111

6. THE PERMITTED TOTAL DISCHARGE FROM THE DEVELOPMENT TO KERB AND CHANNEL, INCLUDING CONTRIBUTION FROM ANY EXTERNAL CATCHMENT, MUST NOT EXCEED 30L/s.

**Law broken by Corrigan - BSD 8111**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a registered professional engineer



**BSD 8113 - limited to one connection at 30 L/s**

**Law broken by Corrigan - BSD 8113**



**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct, of a registered professional engineer

### **NOTES: BSD 8111**

1. DESIGN FLOWS CALCULATED BASED ON MANNING'S 'n' OF 0.011. PIPE SIZED ASSUMING A DISCHARGE OF 15 L/s FROM EACH ALLOTMENT - BASED ON ROOF AREAS OF 250m<sup>2</sup> AND ARI OF 20 YEARS FOR S.E. QUEENSLAND. ALL PIPES SHALL HAVE A MINIMUM DIAMETER OF 150mm, EXCEPT ACROSS FOOTPATH.
2. WHERE THE PIPE GRADIENT EXCEEDS 5%, UNDERTAKE A MORE DETAILED HYDRAULIC ANALYSIS INCLUDING THE ASSESSMENT OF STRUCTURE LOSSES, WHERE APPROPRIATE.
3. AN EASEMENT IN FAVOUR OF COUNCIL IS REQUIRED WHEN THE ROOFWATER LINE IS DESIGNED TO SERVICE MORE THAN 2 ALLOTMENTS, IRRESPECTIVE OF PIPE SIZE.
4. DISCHARGE TO KERB AND CHANNEL MUST BE LIMITED TO 30L/s.

**Above - discharge to kerb and channel must be limited to 30L/s.**

Only one connection to the kerb is allowed

Only <30 l/s is allowed.

**Law broken by Corrigan - BSD 8111**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory Conduct, of a registered professional engineer

### **25) Corrigan states "demonstrate a satisfactory solution"**

- 3.7. In my opinion, the proposed development triggers the need for piped stormwater infrastructure within the subject site that will manage flows in accordance with the planning scheme. Hence, in my opinion, as is the usual practice, the Applicant should provide the necessary design with sufficient details to demonstrate a satisfactory solution.

Corrigan states that the applicant .. **"demonstrate a satisfactory solution"**

Corrigan acknowledges that one must follow the Planning Scheme.

However, there is no obligation by the applicant to provide a "satisfactory solution."

The previous Condition and the current Condition 17 states that Planning Scheme codes and Brisbane Planning Scheme Policies must be followed, not "satisfactory solution"

Why does Corrigan go about to concoct flooded plans and cause rear neighbours to build illegal rainwater tanks and break over 30 laws?  
Corrigan solution?

There has been no information request by an assessment manager in the Audit of 412 cases approved, as filed in Court stating a requirement for a "solution",

All information requests by Council officers ask the applicant how they can comply with Council Codes and Planning Scheme Policies, not a "solution".

**26) Corrigan has not supplied any evidence of how Corrigan has complied with Council Planning Scheme Policies and laws.**

Corrigan says that the rear neighbours must install stormwater infrastructure in their own properties and force roofwater of 4000 sqm of 3 story properties into one tiny kerb adaptor in Ashridge Rd.

Corrigan's report has broken Council laws around 100 times. Those offences may incur Council fines of  $100 \times \$751,500 = \$75,1500,000$

<u>On-site drainage</u>	
4.1.	The requirements for on-site drainage are set out in PO2, PO3 and PO4 of 9.4.9 Stormwater Code of the Planning Scheme as follows.
PO2	<i>Development ensures that the stormwater management system and site work does not <u>adversely impact flooding or drainage characteristics of premises which are up slope, down slope or adjacent to the site.</u></i>
	<b>Corrigan plan will cause flooding</b>
PO3	<i>Development ensures that the stormwater management system does not direct stormwater run-off through existing or proposed lots and property where it is likely to <u>adversely affect the safety of, or cause nuisance to properties.</u></i>
	<b>Corrigan plan will cause flooding</b>
PO4	<i>Development provides a stormwater management system which has sufficient capacity to safely convey run-off taking into account <u>increased run-off from impervious surfaces and flooding in local catchments.</u></i>
	<b>Corrigan plan will cause flooding</b>

By Corrigan's own standards, his plans will flood Darra and he breaks all the abovementioned Planning Scheme Codes.



**Law broken by Corrigan** - PO2

**Law broken by Corrigan** - PO3

**Law broken by Corrigan** - P011

## **27) Corrigan deluded again - "fill the Southwest corner"**

4.3.2. There must be no change of stormwater discharge to an adjacent property which causes a nuisance. Lot 1 to the west is the adjacent property to be considered. The rear area of the proposed lot at the southwest corner which is a low point, must be considered.

Corrigan is deluded. Council operates on the no worsening principle.

Corrigan wants the applicant to fill the southwest corner. Corrigan thinks a new house is a barrier.

Corrigan is aware that there is no requirement by Manteit to place a teaspoon of fill on the site, in order to seal the plan of subdivision. But he still tries to con the Court.

**Condition 12 and fill conditions in 17 and 18 were removed by Council on 31/1/25.**

**A replacement retaining wall shall be constructed, in any case, which has its own lawful point of discharge for stormwater to prevent nuisance flooding on any other lot.**

Why is Schrinner and Freeman paying for such incompetency? Why did Susan Hedge yell and scream to force Judge Williamson KC to believe in this fool ?  
(transcript)

**21) Corrigan makes false statement that a private certifier will be needed to review the design of the stormwater system.**

5.11. I defer to the opinion of Mr Ryan that no further operational works permit will be required for the Applicant to install a stormwater solution required by the conditions of development approval. In my experience, the further approval that will be needed is a building permit from a private certifier. There is no later opportunity for Council to review detailed design of the stormwater system. Hence, in my experience, an appropriately detailed stormwater master plan is submitted at the DA stage which has sufficient design detail to demonstrate compliance of the stormwater drainage for the proposed development. At the time of the later assessment, the private certifier will check compliance of plans for the building permit with the scope of stormwater defined in the DA.

**Corrigan is deluded yet again. Corrigan makes false statement that a further approval will be needed is a building permit from a private certifier.**

Corrigan states that a private certifier is required. This is a completely false statement, designed to fool Judge Williamson KC and the public. Susan Hedge stated to Judge Williamson KC that Corrigan was very very believable (transcript).

**"is submitted at the DA stage to demonstrate compliance of the stormwater drainage for the proposed development".**

Corrigan has no knowledge of Council laws whatsoever.

**Corrigan is deluded yet again. The building of a house is not required for plan sealing of the subdivision.**

6.6.3. Drainage to the southwestern corner area of the subject lot (to the rear of the proposed new dwelling). This area is a low point and the proposed new dwelling on the subject lot will cause concentration of stormwater at this location. Unless captured and conveyed, this stormwater will cause concentration of flow onto Lot 1 RP117157.

**22) Corrigan is deluded yet again. The building of a house is not required for plan sealing of the subdivision.**



Corrigan thinks that the building of a house will cause concentrated flows onto Lot 1 RP117157.

There is no house required to seal the subdivision.

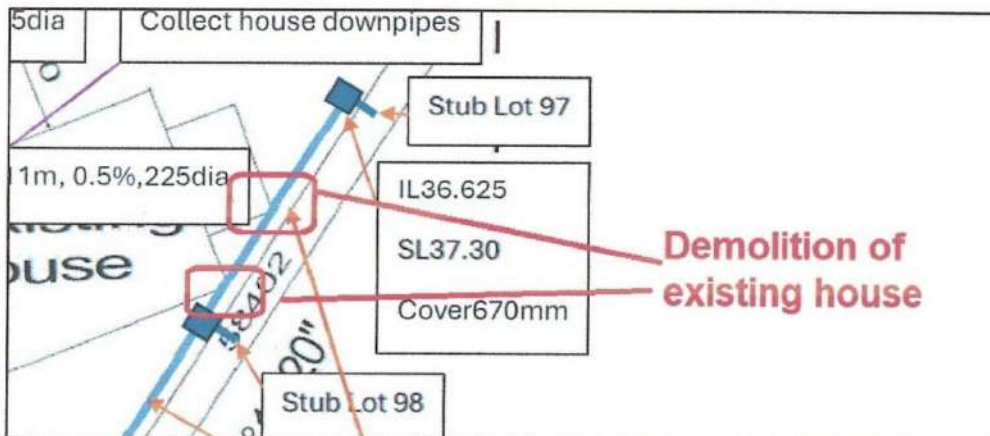
**Corrigan knew that Condition 12 was removed by Council on 31/1/25, some 3 months prior to the trial.**

Why had Susan Hedge not informed Corrigan of this fact? Susan Hedge has wasted ratepayers money by allegedly instructing the preparation of the Corrigan report.

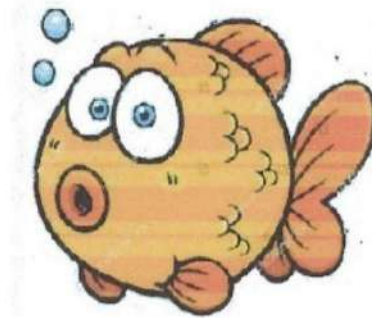
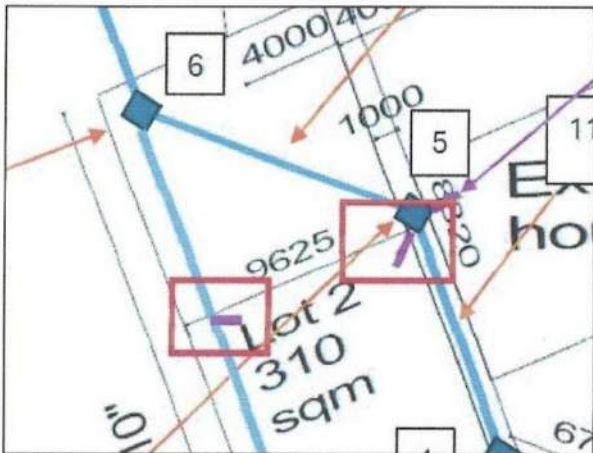
**Law broken** - alleged fraud

**Law broken** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, of a registered professional engineer

**21) Corrigan plan requires demolition of the existing house. This would be a requirement not expected under S67 of the Planning Court Act 2016.**



**Corrigan pipes traverse under the proposed new house slab.**



**Above - Corrigan pipes traverse under the proposed new house slab.**

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002  
Unsatisfactory Conduct, of a registered professional engineer

### **23) Corrigan provides two positions of the rainwater stubs for the future house.**

- 1) Only one lawful point of discharge is required, not 2.
- 2) The two stubs are placed under any future house slab.

The lawful point of discharge stub for Lot 2 should be from a pit placed behind the boundary. In many cases, a single pipe instead of a pit is accepted. Full details of proper design are provided by Civil Works, as filed in Court.

- 3) The stub provided for lot 1 is provided around the side of the house. How will any structure including a carport be able to connect to a lawful point of discharge ?
- 4) There will be new sewerage installed under the walkway on Lot 2. The new sewerage is required to be at least 600mm below ground, by law, invert level of 750mm.

**Law broken** - Schedule 2 of the Professional Engineers Act. 2002. Unsatisfactory professional conduct, of a professional engineer



## 26) Corrigan forces a stormwater pit to be built next to my house.

The Corrigan stormwater pit and Upstream stormwater line placed butting up to the existing house will cause-

The private drain cannot be rediverted from the rear of the house to the new approved Urban Utilities connection as it will become too deep.

The house will be required to be demolished.

### Manteit calculations of depth of stormwater pipe next to house

450	cover required
300	pipe required
100mm	inspection required
50mm	pit thickness of 50mm'
<u>150mm</u>	compaction
<u>1100mm</u>	invert level of compacted gravel

This means that the **new private sewerage pipe** will need to be invert level of at least

1100mm	below the stormwater pipe.
250mm	drainage gravel
<u>150 pipe</u>	1450 invert level of sewerage pipe
<u>1450mm</u>	invert level of sewerage pipe

<u>150mm</u>	drainage gravel below sewerage pipe
<u>1600mm</u>	invert level of compacted gravel

6) That would make the sewerage **pipe too deep to meet the proposed Urban Utilities approved stub.**

7) Digging down 1600mm will cause will undermine the house and **cause the house to fall over.**

The Freeman and Schrinner instructed Corrigan report will cause the house to fall over.

**PSP S7.4.7 requires a minimum of 1 metre clearance between house foundation and any pipe.**

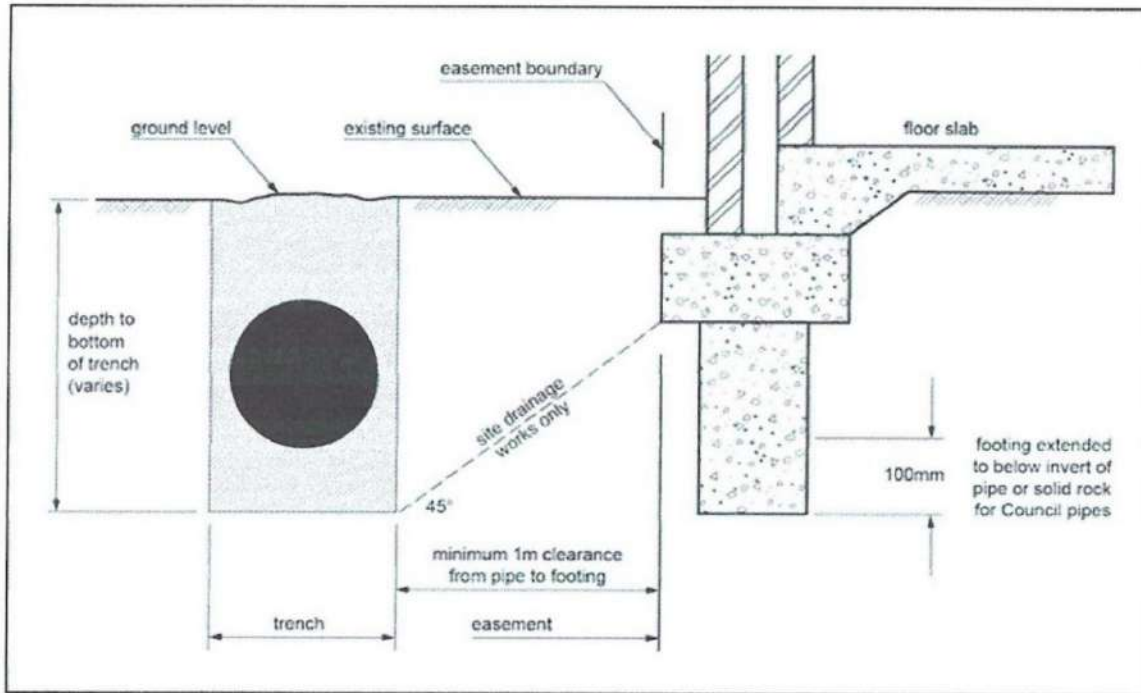
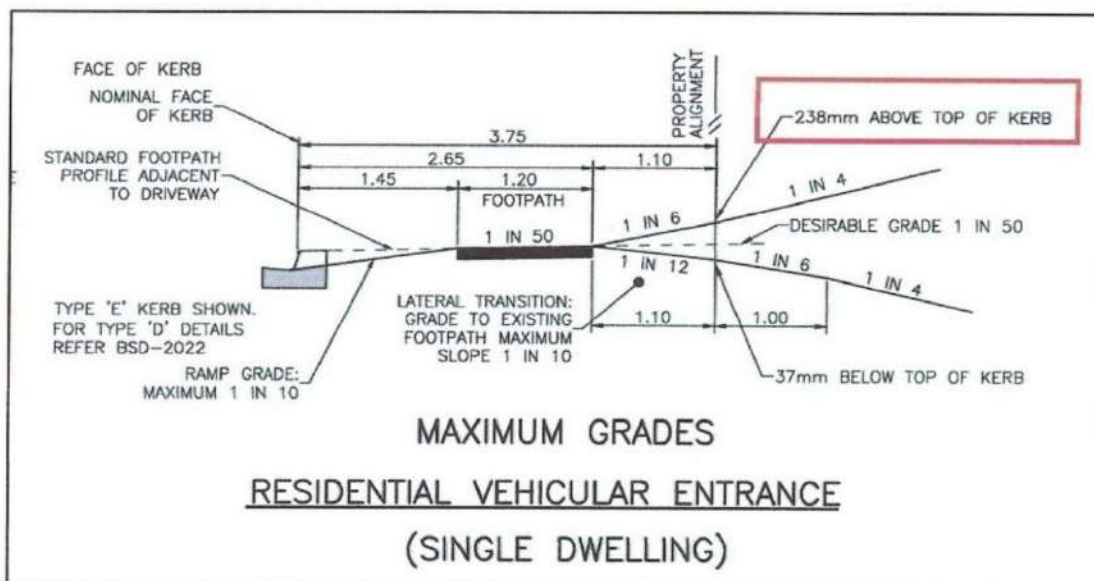


Figure 7.4.7a—Building near and over stormwater and subsoil drains

## 27) Retaining wall and vehicular driveway crossing

There is a proposed retaining wall of up to 900mm high to be constructed after the plan sealing. This will be built in order to bring the Lot 2 pad level down to 36.04 and in keeping with BSD 2024





**BSD 2024 maximum 238 mm from kerb to front boundary**

A retaining wall is required to lower the site pad to comply with BSD 2024.

The maximum height above top of kerb allowed is 238 mm.

Therefore the height of the front boundary needs to be AHD 35.798 in order for BSD 2024 maximum 238 mm to kerb can be complied with.

## 27 Corrigan intentionally used fake Level II drainage instead of Level III drainage

### Stormwater design assumptions

- Level II drainage as per QUDM Section 7.13.2, namely pipe system to convey the greater of 5% AEP (1/20) roof discharge or 39% AEP (1/2) discharge of the roof plus allotment.
- Worst case upstream development assumed to be two townhouses per lot, each 180m<sup>2</sup>, the townhouse towards Killarney Ave to discharge to Killarney Ave, the rear townhouse to discharge towards the subject lot.
- Discharge from upstream lot to be the worst of 5% AEP 180m<sup>2</sup> roof or 39% AEP of 180m<sup>2</sup> roof plus 440m<sup>2</sup> of allotment (namely the portion of the allotment from the rear of the Killarney townhouse to the rear of the lot, 620m<sup>2</sup> less the townhouse itself)

Table 7.2.2.3.B—Design standards for drainage systems

Development category	Design parameter	Minimum design standard	
		AEP	ARI (years)
Rural areas (typically 2–5 dwellings per hectare)	Minor drainage system	39%	2
	Major drainage system	2%	50
Residential developments (Low density residential)	Minor drainage system	39%	2
	Major drainage system	2%	50
	Roof water drainage	Level II <a href="#">QUDM</a>	
<u>Residential developments (Low–medium density to High density)</u>	Minor drainage system	10%	10
	Major drainage system	2%	50
	Roof water drainage	<u>Level III and Level IV</u> <a href="#">QUDM</a>	
Industrial uses	Minor drainage system	39%	2
	Major drainage system	2%	50
	Roof water and lot drainage	Level IV <a href="#">QUDM</a>	
Commercial land uses (centre zones)	Minor drainage system	10%	10
	Major drainage system	2%	50
	Roof water and lot drainage	Level IV and V <a href="#">QUDM</a>	

Quite clearly, Corrigan has attempted to fool Judge Williamson KC and the Brisbane ratepayers by using of illegal engineering to intentionally understate flooding from the rear lots.

**Law broken by Corrigan** - alleged fraud.

**Law broken by Corrigan** - Schedule 2 of the Professional Engineers Act 2002. Unsatisfactory professional conduct, of a registered professional engineer

## 25) Corrigan deception - understatement of fully developed roof cover.

Corrigan attempted to fool Judge Williamson KC with vastly understated site cover and roof cover.

**Keiran Ryan - roofwater calculations 60% maximum site cover. Plus eaves, sunshade structure (eg carport) gazebo (eg patio)**

Ryan states that Lot 2 is LMR3 and will be

5.15 The amount of additional stormwater to be generated by an additional dwelling house on proposed lot 2 will depend on the design on that dwelling. To assist I note that the Dwelling House (Small Lot) Code<sup>10</sup> sets a maximum site cover<sup>11</sup> of 60%<sup>12</sup> where the lot size is greater than 300m<sup>2</sup> but less than 400m<sup>2</sup>. On this basis I think it is reasonable to assume that up to 186m<sup>2</sup> of roof area would result on proposed lot 2.

Ryan

<sup>10</sup> A dwelling house that complies with the acceptable outcomes of this code would not require an application to be lodged with Council

<sup>11</sup> The definition of site cover in City Plan is Site cover, of development, means the portion of the site, expressed as a percentage, that will be covered by a building or structure, measured to its outermost projection, after the development is carried out, other than a building or structure, or part of a building or structure, that is—

- a. in a landscaped or open space area, including, for example, a gazebo or shade structure; or
- b. a basement that is completely below ground level and used for car parking; or
- c. the eaves of a building; or
- d. a sun shade.

Ryan

**Ryan states for Lot 2 - the maximum site cover is 60%. For lots 300sqm - 400 sqm is 60%.**

So 60% site cover is the minimum roof cover for an LMR site for a fully developed catchment according to Ryan.



Ryan agreed in Court that the Manteit design of 10 lots in Killarney St were lawful and met Brisbane City Council Town Planning requirements.

It is also noted by Ryan that in the Manteit plan, the front lots could be 180 sqm, which could be **80% site cover**.

PSP S 7.6.5 requires roof cover for fully developed. Manteit's plan of subdivision for the rear lots is based on fully developed.

Corrigan's two plans deceptively do not provide for fully developed and had understated site cover and roof area by around 100%.

It is alleged that Corrigan intentionally deceive Judge Williamson KC that his  $186 \text{ sm} + 186 \text{ sqm} = 352 \text{ sqm}$  was fully developed for each rear lot

We all know that site cover maximum is  $60\% = 607 \text{ sqm}$ .

This is absurd and alleged fraud. Schinnerer paid ratepayers money for this alleged deception.

It is noted by Ryan that the definition of site cover does not include additional items such as

- Eaves
- Gazebo or shade structure.
- Sun shade, example a carport.

Ryan agreed with Manteit on that principle.

5.10 In my opinion redevelopment of these properties is likely, having regard to their existing use, their size and the town planning context applicable to them under City Plan. Redevelopment may include (for example):

- (a) Multiple Dwelling (noting that development up to 3 storeys is anticipated via code assessment)
- (b) Reconfiguring a lot (noting that subdivision where resulting in lots 180m<sup>2</sup> or greater is anticipated via code assessment)

Ryan says that a multiple dwelling or reconfiguring a lot is likely.

**Warning** - Ryan states what is "likely". This statement is irrelevant since it matters what is lawful. However he does state that there are extras allowed, as per the Small Lot Code.

Manteit had filed arguments describing that the site cover was to include 60-80% site cover plus extras as allowed in the Small Lot Code.

**16) Corrigan was forced to admit in Court that there could be 60% site cover.**

**Corrigan**

Sorry, just to confirm your question, is your question whether the overall development could be minimum 60%?

**David Manteit**

Good question. Just going back to this, let's say the overall development given let's say this is one of the possibilities, it may not be fully developed, but it's of the possibilities, would you say that as a minimum there would be 60% site cover given that permutation which may be correct, if you can tell me if it's correct and whether it could be 60% site cover?

**Corrigan**

I don't have a problem accepting that there could be 60% site cover where that's allowed by the small lot code. I think I'd be guessing, as I've said in the report, there's any number of permutations that could happen on this upstream land. It could be subdivision, it could be something else.

**David Manteit**

People might hate the middle lot, but we don't know. Yeah, and people might build well less than the small lot code

**Corrigan was forced to admit in Court that there could be 60% site cover.**

**16) Corrigan again attempts to understate flooding as often as possible.**



# Adrian Schrinner used your rates money for these Corrigan garbage statements. Why?



Corrigan



**"You can't give a yes or no answer"**

You can't give a yes or no answer. I'd say very unlikely. But until it's looked at in detail, and various options put up. I can, what would, in my experience, what would normally happen to this situation is that the applicant, the developer, would probably engage an architect to do all the setbacks and possible envelope.

**"I think its difficult to say with any certainty"**

Corrigan



29-4-25

I think it's difficult to say with any certainty.

**"would present a lot of problems with the result that the middle house would be very quite small"**

For example, I had a look at where there might be three townhouses on each of those lots and the turning circle to get a car into a garage of the middle lot to enable the owner of the rear lot to get past, the turning circle would present a lot of problems with the result that the middle house would be very quite small.

**"So there are complications like that"**



So there are complications like that, and that's why I thought that under those circumstances a reasonable estimate of a worst case here was what I've said, the 180 metre square townhouse in the rear of the lot.



Corrigan



three townhouses - "would present a lot of problems with the result that the middle house would be very quite small"

I think it's difficult to say with any certainty.

For example, I had a look at where there might be three townhouses on each of those lots and the turning circle to get a car into a garage of the middle lot to enable the owner of the rear lot to get past, the turning circle would present a lot of problems with the result that the middle house would be very quite small.

So there are complications like that, and that's why I thought that under those circumstances a reasonable estimate of a worst case here was what I've said, the 180 metre square townhouse in the rear of the lot.

**"So if the building upstream ignores or contravenes .....yes, you can get nuisance flooding....."**

29-4-25



Corrigan

So if the subsequent building upstream ignores or contravenes substantially enough, the master stormwater, yes, you can get nuisance flooding caused by not complying with your development approval.

David Manteit

**Why your wording doesn't match the urban drainage manual"**

28-4-25

Is there any reason why your wording doesn't match the urban drainage manual? Is there any reason why you didn't say stormwater management plan?

Corrigan

**"Just using some common jargon"**



No, the references in my report are just using some common jargon to describe what I'm concluding there. I guess it wasn't, I didn't make it as formal as using a capitalised stormwater management plan.

The context, I believe, would show that they're the same thing.

David Manteit

Well, it's just that I think it might be mentioned about 10 times in the report, and it's no reference to anything. I'll put that to you, Mr. Corrigan.

**Corrigan - "I've just used some common language - ..That's all I've done."**

Corrigan



I don't see any problem with that. I've just used some common language to refer to something which in the urban drainage manual has a more formal term to it. That's all I've done.



***A master normally is for the whole of a very large catchment.***

**Corrigan**

A master plan normally is for the whole of a very large catchment.

I mean, there may well be, well, there is a master plan for the whole of the Darra area, but it's a high-level master plan model. In fact, all of Brisbane's got a high-level master plan model.

But it doesn't, it's not used in this context where we're looking at the specific solution to drainage of upstream lots with a future development.



***But it's not used in this context where we're looking at the specific solution to drainage of upstream lot with a future development.***



**Corrigan hasn't done any modelling himself.....**

**"if it turns out a detailed modelling takes place...."**

**Corrigan**

Yes, it could be. It may be that that depending, what I would point out is that the indicative design in that second option shows two curb outlets.

I guess I'd be saying it's indicating that there could be multiple outlets, so one of the options is to go to a third outlet.

If it turns out that a detailed modelling with no detention takes place, there are ways to do a third outlet. I mean, for



***A master normally is for the whole of a very large catchment.***

**Corrigan**

A master plan normally is for the whole of a very large catchment.

I mean, there may well be, well, there is a master plan for the whole of the Darra area, but it's a high-level master plan model. In fact, all of Brisbane's got a high-level master plan model.

But it doesn't, it's not used in this context where we're looking at the specific solution to drainage of upstream lots with a future development.



***But it's not used in this context where we're looking at the specific solution to drainage of upstream lot with a future development.***



## Corrigan makes a typing error and he thinks it is probably pertinent"

28-4-24

Corrigan



There's a typing error on one of the plans and I think it probably is pertinent to what I've heard this morning, so I'll take you to that, so. Yes, but let's start with, is it on page 60? It's on page 60.

David Manteit

**"You don't know that there's actually one of these systems has been approved..?"**

So, you don't know that there's actually one of these systems that has been approved under City Plan 2014 at all. Is that correct, Mr Corrigan?

Corrigan

No, I know of such a solution since 2014. Yes, I do know of them.

I can't exactly just recall the address right now or anything like that, but I do know that they are entertained from time to time in recent times.

**"I can't recall the address right now or anything like that"**

David Manteit



So you don't actually have any examples that we could quote? Not here and now, no. In 2014, they don't exist, is that correct?

Corrigan **"I don't have any that I can quote for you right now"**



I don't have any that I can quote for you right now, no.

**"the indicative plan that I showed for catchments and flows would be done .. and would have pages and pages of printout."..... Corrigan still using Fortran from 1977**

**"that would be what the upstream developer would have to use" (pages and pages of paper)**

Corrigan



Okay, so the indicative plan that I showed for catchments and flows would be done in more detail and formalised generally by one of the software models, and that would then have pages and pages of printout, and that would become part of the development approval and that would be what the upstream developer would have to use.



**JWKC - "Do you accept that in your assesement of the catchment..... 28-4-25  
could be more inrensy developed?"**

**Corrigan "Of course, absolutley, yes.....then stormwater  
discharge will increase"**



**Judge Williamson KC**

Mr Corrigan, do you accept that in your assessment of the catchment, if it's within your area of expertise, could be more intensely developed?

**Corrigan**

Of course, absolutely, yes, and if it subsequently may turn out, and these exercises in my experience have done just that, where subsequent town planning experts agree that a denser development is possible upstream. If that is the case, then the stormwater discharge will increase.

**Corrigan, in the olden days..... 28-4-25**

**Corrigan - "In my experience, there used to be a rule  
of thumb..... (ie, in the olden days)**



**Corrigan**

In my experience, to do a detention calculation, there used to be the rule of thumb from Queensland Urban Drainage Manual, and five minutes was a typical kind of solution.

**...five minutes was a typical kind of solution...**



**"My role's not to design it  
for you"**




This would be part and parcel though, again, of this detailed modelling that you'd expect to get

My role here was to show an indicative solution that would work here.

**My role's not to design it for you.**

My role's to show that there's a solution that can be made to work here. If it turns out that detailed engineering examination of this shows that the coefficient is higher than what I've assumed, then the flow would be higher by that amount.

 I still don't think that that goes to anything. It just shows that there's a slightly higher flow from the upstream development that needs to be catered for, by whatever means that is going to be catered for.

**"So if the building upstream ignores or contravenes .....yes, you can get nuisance flooding....."**

**Corrigan**

So if the subsequent building upstream ignores or contravenes substantially enough, the master stor  
get nuisance flooding caused by not complying with your development approval.



ou can

**Manteit - "I'm sitting there and I've got to call the police.....is that correct?"**

**David Manteit**

All right, so you admit there could be flooding in Newtons because people don't have any physical way of  
flow to be 38, 38 and 38, which is 114 litres per second, the capacity of three, two, two five mil pipes. You  
there's no way to stop it. It wouldn't be flooded. I'm sitting there and I've got to call the police or someone  
how I understand that, please?



at  
hat  
rect,

**Corrigan "What you said is correct**

The latter part of what you said is correct if the upstream development does not adhere to the conditions that they would  
have got for their development approval. So if the subsequent building upstream ignores or contravenes sut



**Corrigan wants to use a pipe 24-4-25  
with an instrument.**

If it turns out that a detailed modelling with no detention takes place, there are ways to do a third outlet. I mean, for  
example, what was going through my mind when I was listening before was that there could be yet another pipe with an  
instrument from lot 97 straight across to the northeast of the existing house, which would solve a lot of problems. So there  
are these different concepts that one could Yes,

**Corrigan comes clean.**

**30-4-25**

**Corrigan wants to exceed the maximum that's in the Planning Scheme.**

**Corrigan**

I think the wording of 9.92 could probably better say a second option is to reduce or not make use of detention tanks, as  
shown indicatively in attachment D. Now the heading at the top of the second option of attachment D says less detention.

I didn't really look at what the solution would be for the difference between less detention and no detention. I was just  
trying to show something indicative as to how you deal with the curb discharges exceeding the maximum that's in the  
planning scheme. The 30 litres a second?



**Corrigan**

## Corrigan has lots of problems

Yes, it could be. It may be that that depending, what I would point out is that the indicative design in that second option shows two curb outlets.

I guess I'd be saying it's indicating that there could be multiple outlets, so one of the options is to go to a third ou



If it turns out that a detailed modelling with no detention takes place, there are ways to do a third outlet. I mean, for example, what was going through my mind when I was listening before was that there could be yet another pipe with an instrument from lot 97 straight across to the northeast of the existing house, which would solve a lot of problems. So there

**Susan Hedge**

## Dumbo Susan Hedge picks up Corrigan's typos. Corrigan not capable to work his own mistakes.

And then there's an orange arrow pointing to that blue square. That's correct. Which appears on the, which leads to a box and in the box it says IL 35.91, SL 36.5 and cover 830mm. That's correct. I'll just check we're all looking at the right box. Thank you. And so is one of those numbers mistyped?

**Corrigan**

Yeah, there's a mistype, so where it says at the moment IL 35.91, it was meant to say IL 35.31. So the nine should be replaced by a three.

**"Yeah there's a mistype. It was meant to say 35.31"**

**28-4-25**

## When an accurate design was done, that would be looked at a little bit more carefully, to get an accurate statement..

And the cover is how much soil there is above the pipe. Nominally here, I've just pretty much taken the cover as being the difference between the IL and the SL, but when an accurate design was done, that would be looked at a little bit more carefully to get an actual accurate statement of the cover.

**Corrigan had a brainwave while he was listening to someone in court..**



**Corrigan "what was going through my mind when I was listening before.."**

Yes, it could be. It may be that that depending, what I would point out is that the indicative design in that second option shows two curb outlets.

I guess I'd be saying it's indicating that there could be multiple outlets, so one of the options is to go to a third outlet.

If it turns out that a detailed modelling with no detention takes place, there are ways to do a third outlet. I mean, for example, what was going through my mind when I was listening before was that there could be yet another pipe with an

**"i didn't really look at what the solution would be...."**



**Corrigan**

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**Corrigan needs to sit down**



**"I can't give you a definitive answer without sitting down"**

**Corrigan "and doing all the design considerations"**

I would think it's unlikely. It would need to be looked at and I can't give you a definitive answer without sitting down and doing all the design considerations and so on.

**David Manteit**

***Why your wording doesn't match the urban drainage manual"***

Is there any reason why your wording doesn't match the urban drainage manual? Is there any reason why you didn't say stormwater management plan?

**Corrigan**

***"Just using some common jargon"***



No, the references in my report are just using some common jargon to describe what I'm concluding there. I guess it wasn't, I didn't make it as formal as using a capitalised stormwater management plan.

The context, I believe, would show that they're the same thing.

**David Manteit**

Well, it's just that I think it might be mentioned about 10 times in the report, and it's no reference to anything. I'll put that to you, Mr. Corrigan.

***Corrigan - "I've just used some common language - ..That's all I've done."***

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I don't see any problem with that. I've just used some common language to refer to something which in the urban drainage manual has a more formal term to it. That's all I've done.





**the indicative plan that I showed for catchments and flows would be done .. and would have pages and pages of printout.....** **Corrigan still using Fortran from 1977**

**Corrigan**



Okay, so the indicative plan that I showed for catchments and flows would be done in more detail and formalised generally by one of the software models, and that would then have pages and pages of printout, and that would all become part of the development approval and that would be what the upstream developer would have to use.

**29-4-25**

**"So you just don't know the answer until those professionals have a look at it, and they need to have a really good look at it"**

**Corrigan**

It may be that what the architect comes up with as a development solution is a smaller roof area than what the engineer comes up with who's just looking at setbacks and trying to find the highest roof area that can fit in that's consistent with turning circles for vehicles and all that kind of thing.

So you just don't know the answer until those professionals have a look at it, and they need to have a really good look at it too, to come up with what would be the most likely ultimate upstream development.



**29/4/25**

**"It would need to be looked at in some detail"**

**Corrigan**

No, I think there are going to be issues with setbacks from the boundaries. I don't think you could fiddle as well.

It would need to be looked at in some detail as to what various options might be.



**29/4/25**

**"I think all those options would need to be looked at with dimensions and figuring out levels"**

**Corrigan**

I said a moment ago I think all those options would need to be looked at with dimensions and figuring out levels and how conceivably it might work.

There'd be a bit of time involved to have a look at that. I considered for the purposes of what is a reasonable assumption here, the option that I've described.

**"There'd be a bit of time involved to have a look at that"**

29/4/25

Corrigan

**"I think all those options would need to be looked at with dimensions and figuring out levels"**



I said a moment ago I think all those options would need to be looked at with dimensions and figuring out levels and how conceivably it might work.

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**"There'd be a bit of time involved to have a look at that"**



29-4-25

**"So you just don't know the answer until those professionals have a look at it, and they need to have a really good look at it"**



Corrigan

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So you just don't know the answer until those professionals have a look at it, and they need to have a really good look at it too, to come up with what would be the most likely ultimate upstream development.

**"I think it's difficult to say with any certainty"**

30-4-25

**"would present a lot of problems"**

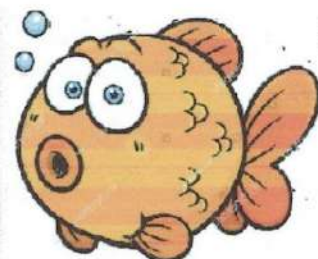
**"so there are complications like that"**

Corrigan

I think it's difficult to say with any certainty.

For example, I had a look at where there might be three townhouses on each of those lots and the turning circle to get a car into a garage of the middle lot to enable the owner of the rear lot to get past, the turning circle would present a lot of problems with the result that the middle house would be very quite small.

So there are complications like that, and that's why I thought that under those circumstances a reasonable estimate of a worst case here was what I've said, the 180 metre square townhouse in the rear of the lot.





24-4-25

Corrigan

"you'd need to sit down with all the dimensions and at that specific issue."



you'd need to sit down with all the dimensions and look at that specific issue.

David Manteit

30-4-25

Well, could I say, Mr Corrigan, if we built up the house pad by 790mm, it would work? And you'll still want



Corrigan

It would certainly, it would possibly work. There are going to be other issues. I mentioned earlier, you may not need to build it up by that much.

You may be able to put the stormwater pipe, I'll deal with the sewerage in a moment, but you may be able to put the stormwater pipe behind the retaining wall.

You know, you took me to the plan by Civil Works engineers before, and there's cross section B, which is

That one. I mean, it shows quite nicely that you could put the stormwater pipe in the pathway behind that retaining wall, and you wouldn't have to lift the house pad.

"it shows quite nicely that you could put the stormwater pipe in the pathway"

David Manteit

Judge Williamson KC

30-4-25 Easement

But the first point is, you say, they can create and constraint. So does Mr Corrigan, do you agree that the pipe and all that would go with it? Does that create a constraint, first of all? Yes, it does. Now, I think Mr. Monty's point is it's a constraint that is so significant, in effect, would preclude the location of provision of other services, or impact on the provision of access?

Corrigan

That's correct.

Judge Williamson KC

And would it be that?

Corrigan

It would be, yes, it's a constraint in terms of planning it out. For other underground services, it would have to be taken into account. If you said access, if it's vehicular access, I mean, I do know where driveways do go over a council easement, so there

**"the issue is that you're putting me to a lot of very detailed possible solutions and questions"**

**"It needs a fairly comprehensive design examination"**

Corrigan

Look the issue is that you're putting to me a lot of very detailed possible solutions and problems, which really have to be looked at to make the overall master plan work. And I think that needs to be done. And I mean, I think there are solutions to all this, but it needs a fairly comprehensive design examination to put all the constraints together.



24-4-25

Corrigan

**"you'd need to sit down with all the dimensions and look at that specific issue."**

you'd need to sit down with all the dimensions and look at that specific issue.



24-4-25

**"now that would all need to be looked at in detail"**

Now that would all need to be looked at in detail.

That's why I think the worst case would be the 180 square metre roof in the rear of the lot. I think that's a reasonable



24-4-25

Corrigan

**"I think all those options would need to be looked at with dimensions and figuring out levels"**

I said a moment ago I think all those options would need to be looked at with dimensions and figuring out levels and how conceivably it might work.

There'd be a bit of time involved to have a look at that. I considered for the purposes of what is a reasonable assumption here, the option that I've described.

**"There'd be a bit of time involved to have a look at that"**



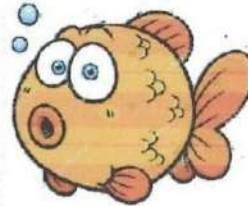


"I think it's difficult to say with any certainty"

30-4-25

"would present a lot of problems"

"so there are complications like that"



#### Corrigan

I think it's difficult to say with any certainty.

For example, I had a look at where there might be three townhouses on each of those lots and the turning circle to get a car into a garage of the middle lot to enable the owner of the rear lot to get past, the turning circle would present a lot of problems with the result that the middle house would be very quite small.

So there are complications like that, and that's why I thought that under those circumstances a reasonable estimate of a worst case here was what I've said, the 180 metre square townhouse in the rear of the lot.

Anyone over the age of 8 years old can prepare a lawful subdivision plan in one hour, by following City Plan 2014 codes, Brisbane Planning Scheme Policies and Brisbane Standard drawings.

Why did Schrinner pay for this idiot to represent Brisbane City Council and the ratepayers of Brisbane?

Schrinner has allegedly used your ratepayers money for this garbage to allegedly fool Judge Williamson KC , and soak up time in court.

How stupid could Schrinner be to present this garbage to a court to allegedly protect unlicenced engineers and the reputation of himself and the CEO?

### 29) Corrigan failed to follow or refer to any Council laws

There is no evidence that Corrigan has complied with any Council or QUDM laws whatsoever.

QUDM states that designers are responsible for conferring with relevant local authorities to determine local design requirements.

**30) QUDM - designers (Corrigan) are responsible for conferring with relevant local authorities to determine local design requirements.**

## **1. Introduction**

### **1.1 Use of this manual**

## **QUDM**

This Manual has been prepared for the purpose of assisting engineers and stormwater designers in the planning and design of urban drainage systems within Queensland. Reference to this document as a Manual should not infer that it is anything more than an engineering guideline.

The procedures outlined in the Manual aim to encourage uniformity in urban drainage design practices throughout Queensland. Designers are nevertheless responsible for conferring with relevant local authorities to determine local design requirements.

**QUDM states that designers are responsible for conferring with relevant authorities to determine local design requirements.**

**Corrigan states that he has examined the benchmarks.**

**But Corrigan never mentioned this responsibility.**

**S 7.5.3.6 - illegal rainwater tanks.**

▪



## Manteit rear lot flow calculations including Lot 97

### 1) What does fully developed mean?

1) Firstly one needs to refer to S 7.6.5 which states that the design must be for **fully developed catchment flows**.

#### 7.6.5 Provision of drainage for future upslope development of a neighbouring property

- (1) Provision must be made for the future orderly development of adjacent properties with respect to stormwater drainage where at least part of those upslope properties would drain through the development, or the most feasible location for stormwater drainage infrastructure to service those properties is within the development.
- (2) If a piped drainage connection is provided for up-slope development, the drainage infrastructure must fully extend to the boundary of the up-slope site to ensure that the up-slope property owner does not have to undertake works in the down-slope property to connect to this stormwater infrastructure.
- (3) Where a pipe is used to facilitate an up-slope stormwater connection (now or in future) the minimum pipe size is 225mm nominal diameter for any development. This stormwater pipe must be connected to a lawful point of discharge.
- (4) The development is to design any up-slope stormwater connection for fully developed catchment flows.

### 2) What rear lots are up-slope.

In the opinion of the Applicant, lot 98 and Lot 99 are not upslope of 128 Ashridge Rd, since there is no water that flows over the rear lot boundary.

In respect of Lot 97, the rear lot land is around 600mm higher at the rear lot boundary. There is a retaining wall and the water falls to the right and not onto the subject land.

In addition, the 128 Ashridge Rd land at the front boundary is higher than the rear lot boundary.

So the slope is to the rear. In effect, a valley.

How does one define upslope?

**Upslope Test 1 - on the boundary.**

It is stated by Manteit that if there is no water flowing over the boundary of the rear lot.

Then that is the end of the argument of a rear lot being upslope.

There is a valley between the subject site and the rear lots 98 and 99.

The rear lots are upslope of each other.

At the rear boundary of those two lots, 128 Ashridge Rd land is higher than lot 98 and lot 99.

The bottom of the valley are the rear lots, not 128 Ashridge Rd Darra.

That is the end of the case for those rear lots 98 and 99 being upslope.

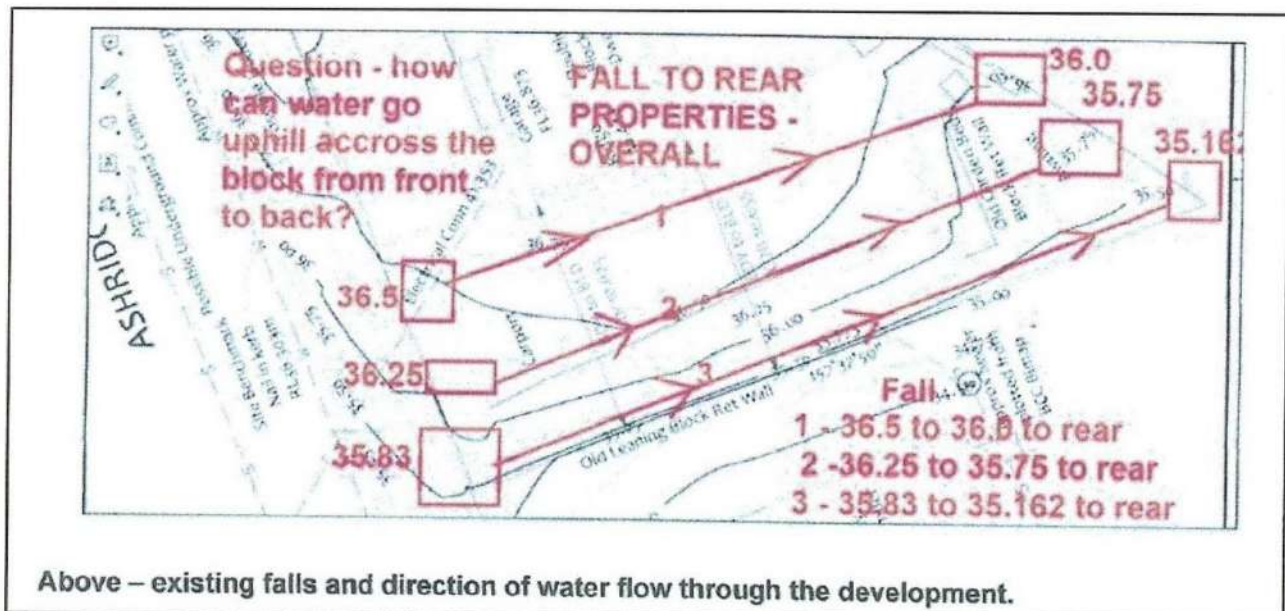
The following is provided for further discussion if that argument is contended with.

### Upslope Test 2:

The land of 128 Ashridge Rd Darra falls back from the front boundary to the rear.

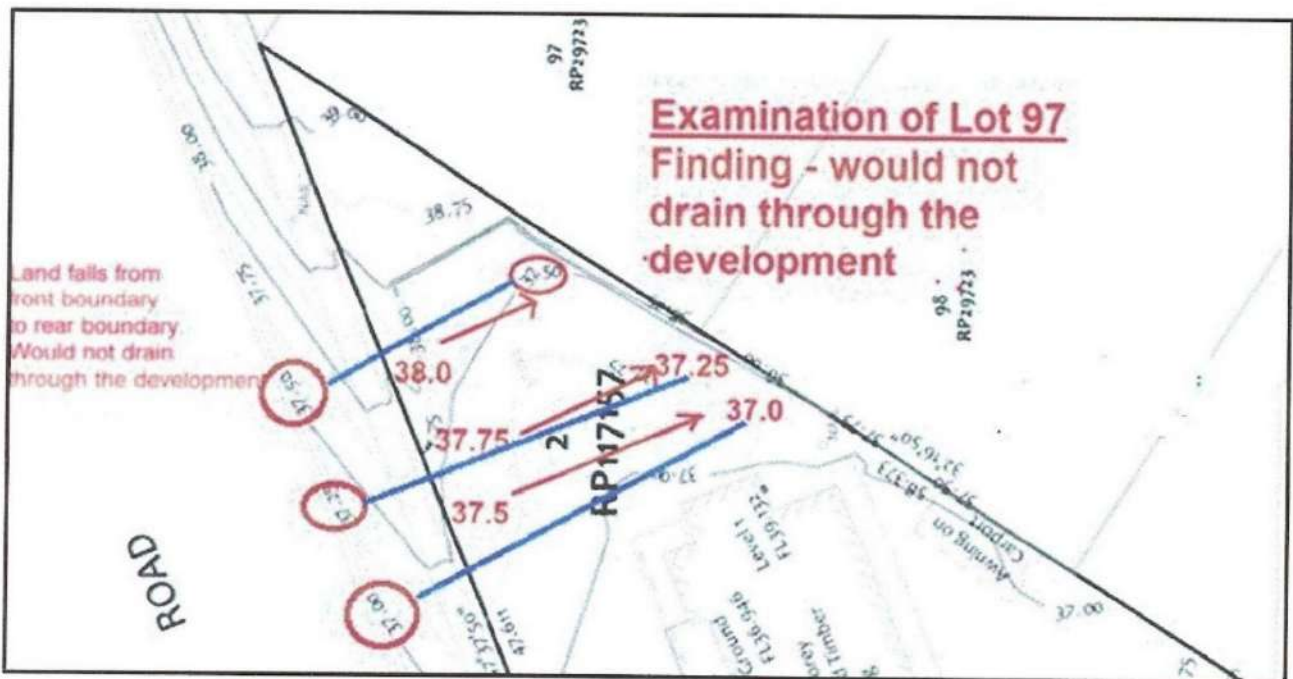
There is no way for water to flow on the surface from the rear land to the front boundary of 128 Ashridge Rd, since the land is upslope to Ashridge Rd.

This test was already provided in the Notice of Assessment.



Notice of appeal - filed.





The "Council employees" knew of these land surfaces from 12/7/25.

It is therefore impossible to provide successful "would drain through the development" if the surface area of the land falls backwards to the rear lot.

Why did the Council employees not examine this, on 12/7/25.

### 3) What are the fully developed rear lot subdivided lots ?

A subdivision plan is provided for the fully development lots. This plan has been filed, and was presented to the Court on 28-4-25.



Above - Manteit proposed subdivision plan

If in the 2 or 3 storey mix zone precinct of the Low-medium density residential zone			
Development of a residential lot	260	6 x 15	7.0
Where adjoining the side boundary of a lot 400m <sup>2</sup> or greater and vehicle access is from a secondary frontage (typically a rear lane)	260	6 x 15	6.5
Where adjoining the side boundary of a lot 400m <sup>2</sup> or greater containing an existing dwelling house	260	6 x 15	7.5
If in the Up to 3 storeys zone precinct of the Low-medium density residential zone			
Development of a residential lot	180	6 x 15	6.5
Where adjoining the side boundary of a lot 400m <sup>2</sup> or greater and vehicle access is from a secondary frontage (typically a rear lane)	180	6 x 15	6.0

Above - City Plan



Lot 97  
4 lots

238 sqm  
238 sqm  
350 sqm  
350 sqm  
1176 sqm

Lot 98  
3 lots

260 sqm  
260 sqm  
350 sqm  
1012 sqm

Lot 99  
3 lots

260 sqm  
260 sqm  
350 sqm  
1012 sqm

#### 4) Site cover

Site cover is estimated as follows:

##### Lot 97

700 sqm\*60% = 420 sqm  
538 sqm\*70% = 376 sqm  
Total site cover 776 sqm

Corrigan 368 sqm

##### Lot 98

1012 sqm \* 60% = 607 sqm

Corrigan 368 sqm

##### Lot 99

1012 \* 60% = 607 sqm

Corrigan 368 sqm

One can see the extent of the underestimate of rear lot flooding calculations by Corrigan.

These calculations do not allow for additional roof area lawfully from the Small Lot Cide.

**AO8**

Development results in a maximum **site cover** of:

- a. 50% where the lot is 400m<sup>2</sup> or more; or
- b. 60% where the lot is 300m<sup>2</sup> or more and less than 400m<sup>2</sup>; or
- c. 70% where the lot is 200m<sup>2</sup> or more and less than 300m<sup>2</sup>; or
- d. 80% where the lot is less than 200m<sup>2</sup>.

Editor's note—For the purposes of determining compliance with AO8 reference is to be made to **section 1.7.6.**

**Above - Small Lot code site cover.**

**Maximum site cover is therefore 60% - 70%.**

### **Additional roof area**

**Other roof areas allowed as follows -**

#### **SITE COVER**

##### **ADMINISTRATIVE TERM**

Site cover, of development, means the portion of the site, expressed as a percentage, that will be covered by a building or structure, measured to its outermost projection, after the development is carried out other than a building or structure, or part of a building or structure, that is—

- a. in a landscaped or open space area, including, for example, a gazebo or shade structure; or
- b. a basement that is completely below ground level and used for car parking; or
- c. the eaves of a building; or
- d. a sun shade

**Patio cover**

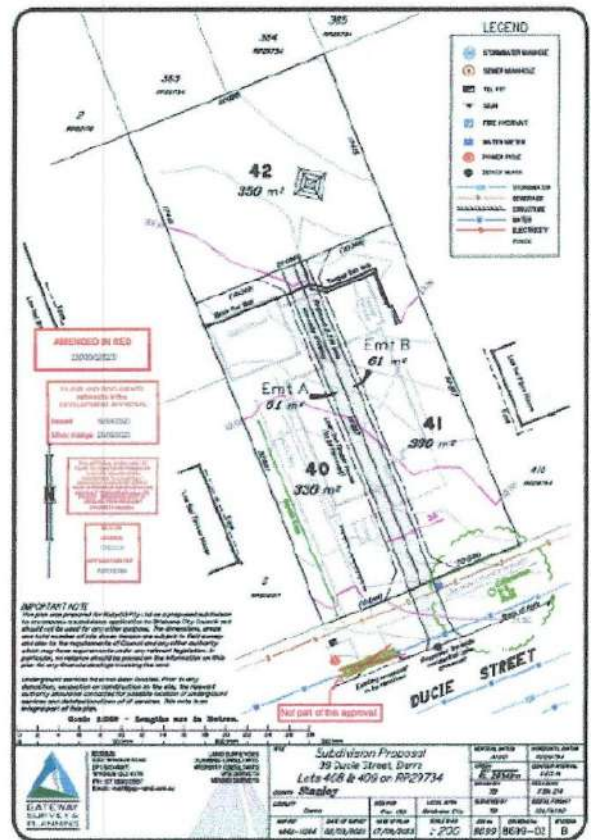
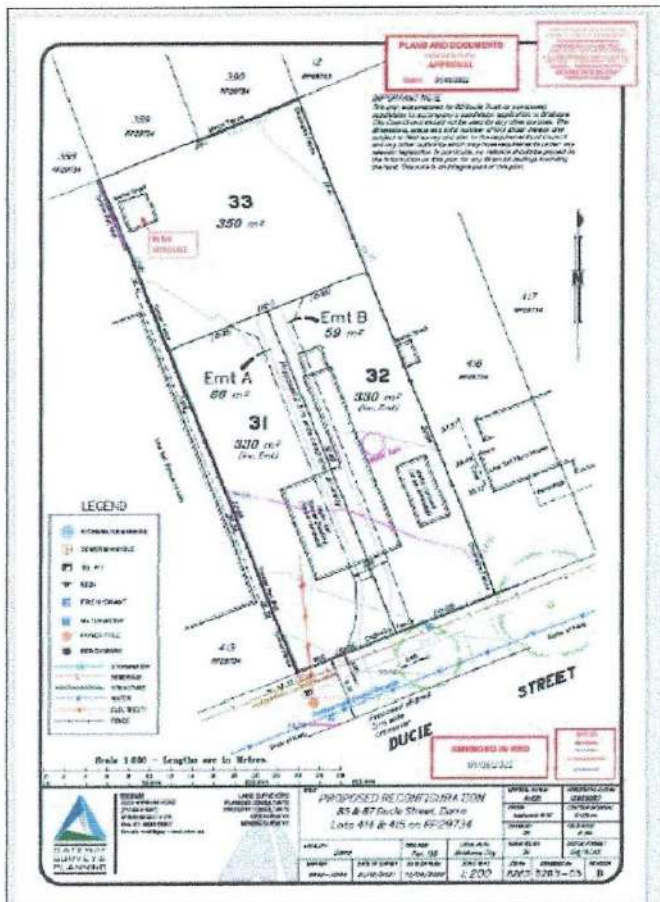
**Patio cover**

### **Comparison to similar sites in Darra**

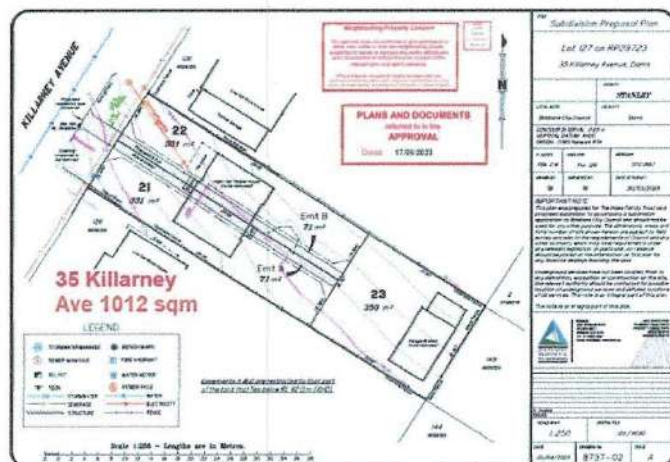
#### **106. Roof calculation Small Lot Code conservative example 85 and 97 Ducie St Darra, 35 Killarney Ave Darra.**

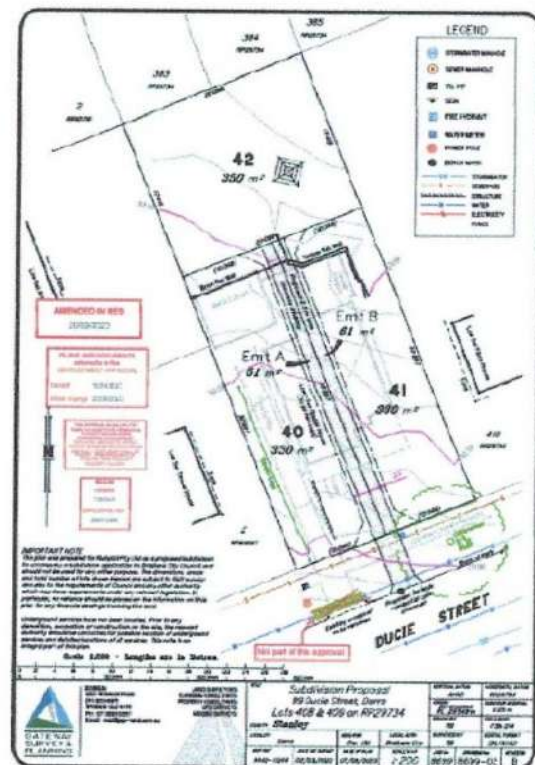
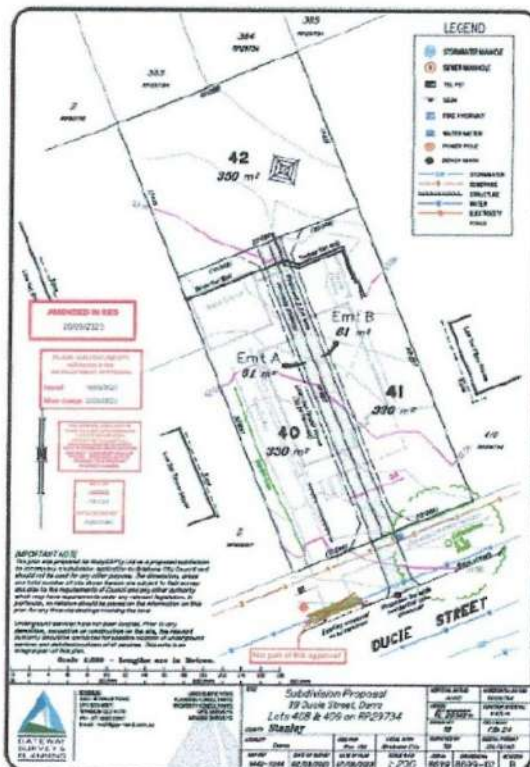
Lot size	331
Site cover 60%	198
Eaves	36 (lawful)
Patio	40 (lawful)
Carport	36 (site variation)
Total roof size	<u>310</u>
% roof cover	95%
Conservative	90%





Above - examples of approved 1,012 LMR2 sites in Darra. All approved for 3 lots. LMR2 requires a minimum of 250sqm for the front lot. Already subdivided in Darra. Corrigan intentionally left this 3 lot subdivision out of his report to deceive Judge Williamson KC





**Manteit calculations of rear lot flow velocities at kerb.**  
Note that lot 97 has been extrapolated from Civil Works report.

				C2 = .74	C20 = .91
		Land	Roof	Land	Roof
<b>Lot 97</b>					
Roof size	4 lots @90%	1176	1058	37	69
<b>Lot 98</b>					
Roof size	3 lots @90%	1012	910	31	59
<b>Lot 99</b>					
Roof size	3 lots @90%	1012	910	31	59



**Total**

**187 L/s**

## **Kerb pipe flow velocity**

**Note that one must take the higher of C20 or C2, as per previous filed reports.**

## **Summary of flow velocities at kerb.**

**Total velocity = 187 L/s Pipe required = 375mm.**

The flow for each lot is over 30 l/s and cannot use the kerb and channel as a lawful point of discharge, either individually or as a total.

Therefore the kerb cannot be used as a lawful point of discharge for any of the rear lots

This is not taking into account

## **Examination of Lot 97**

David Manteit has done examination of Lot 97 for any requirement for Upstream Stormwater drainage.

### **1) Fall over boundary.**

There is fall over the rear boundary of lot 97 to 128 Ashridge Rd.

### **2) The fall of land is from the Ashridge Rd boundary front boundary to the rear boundary, to lot 97.**

As for the whole site of 128 Ashridge Rd, land falls from the front boundary to the rear boundary. On that basis alone, under PSP S7.6.5, water would not drain through the development (the Ashridge Rd development).

3) There is fall of land from the kerb to the rear boundary. Based on surface level alone, water would not drain through the development.

4) Corrigan report and Manteit audit of Corrigan report has already determined that the Corrigan proposed connection will be 390mm below the Ashridge Rd kerb or 790mm below the Ashridge Rd Kerb.

Corrigan came clean and admitted his flooded pipes in Court.

### Simple interpretation of fall.

Cover	450
Pipe	<u>375</u>
Depth required at rear lot boudary (below surface)	<u>775</u>
Example fall 50 metres	<u>250</u>
Total average fall required to achieve "drain through the development	1025 mm

In simple terms Rear lot land needs to be at least around one metre above the kerb to drain through the development (development means the subject lot development).

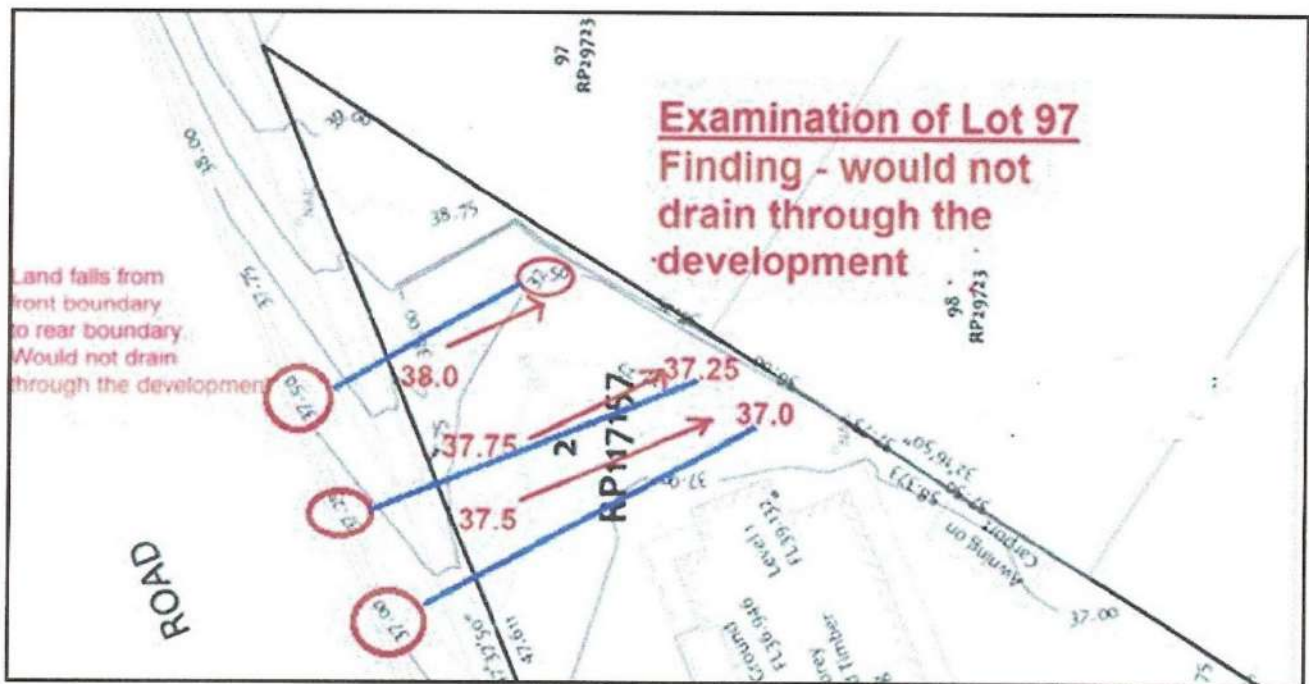
It seems that solicitors do not understand this concept. The rear lot land may or may not have slope over the rear lot boundary.

But on average 1025 fall from the rear lot land surface compared to the invert level of the kerb is required to achieve "would drain through the development"

Therefore the **rear lot boundary would need to be around 1025 mm fall, on the rear boundary compared to the kerb**, in order to achieve compliance with PSP S7.6.5 "Would drain through the development"

Solicitors do not understand this concept.



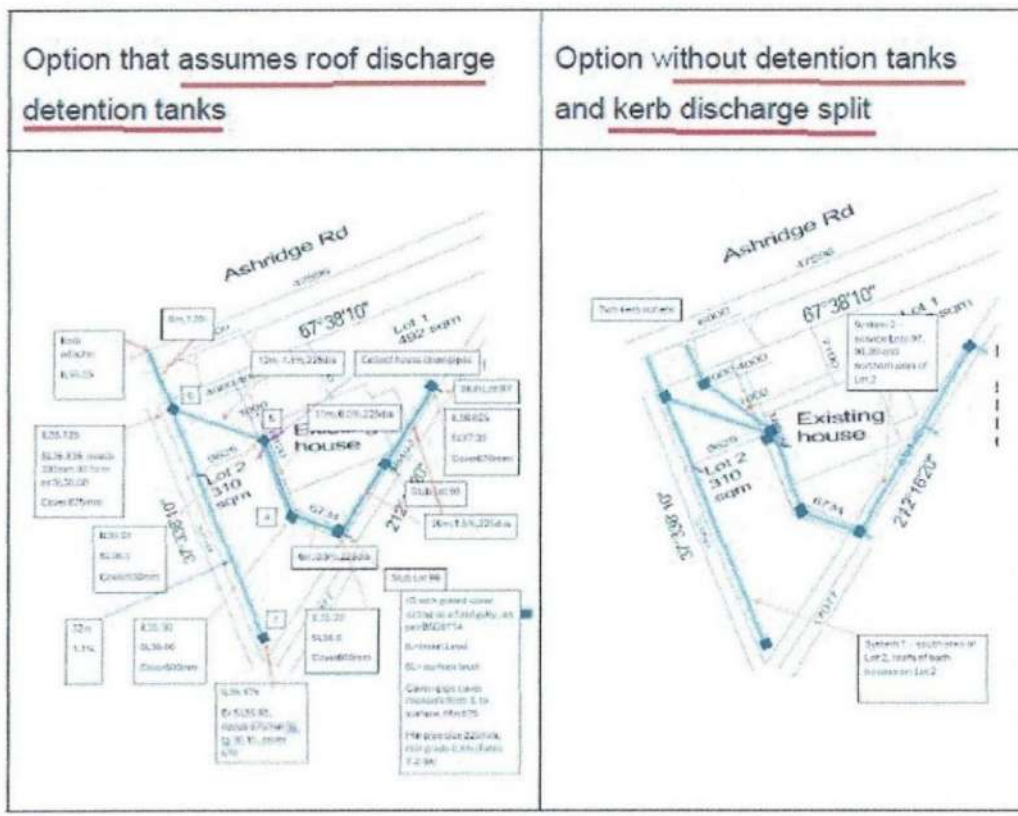


Net result - lot 97 is not upslope to the rear lot.

## Flooded Council plan No. 4 - Corrigan

Corrigan's second flooded plan. That makes a total of 7 flooded plans paid for with ratepayer's money, by your Lord Mayor and CEO Dr Kerry Freeman.

9.9. The two options in Attachment D are as follows and an excerpt from Attachment D is as follows.



Above - Corrigan flooded plans.

Corrigan says his second plan is without detention tanks and **two kerb adaptors**.

This is new type of Corrigan con.

Corrigan admitted that site cover could be between 60% and 80%.

In addition, Corrigan admitted later in Court that his second plan would actually **Corrigan admitted that his flow from the rear lots plus Lot 2 were at least 78 L/s.**



**This Corrigan plan would require 3 kerb adaptors.**

**Corrigan refused to supply individual flow L/s for each rear lot.**

Corrigan has never explained to Judge Williamson KC what the flow L/s is in his opinion is, for each individual rear lot.

Corrigan has therefore gone for the "all rear lots, or nothing " approach"

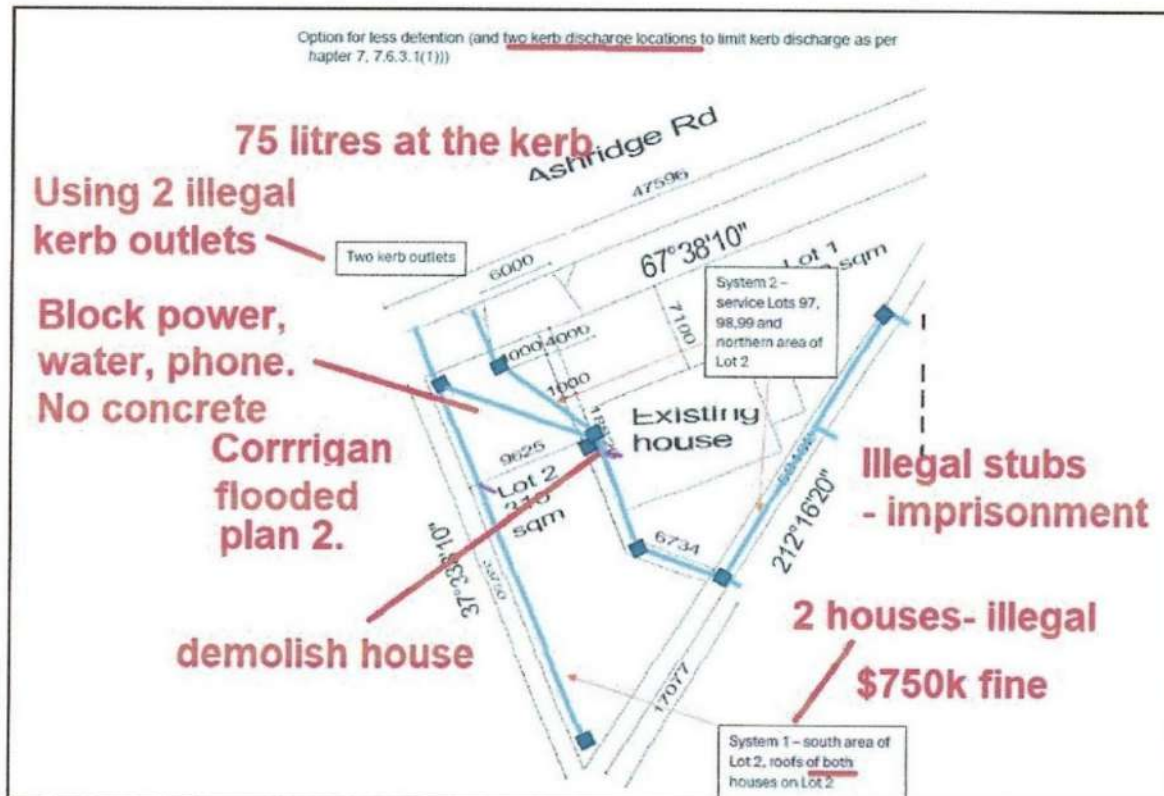
## Why does Corrigan continue to break laws?

In this Corrigan plan, Corrigan has made more intentional errors to fool Judge Williamson KC.

Hedge had already told the Court that Council would not accept a proposal by Manteit for an illegal condition to be placed in the approval for a kerb adaptor to take over 30 L/s.

Both Corrigan's options are for detention. This one is for less detention.

Option for less detention (and two kerb discharge locations to limit kerb discharge as per chapter 7, 7.6.3.1(1)))



**Corrigan has prepared yet another flooded plan. It is possible for Council to come up with a 7th or 8th flooded plan? Corrigan is the flooded plan expert.**

Corrigan system 2 around 75 litres per second								
	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	Cross check
FSL	37.300	37.000	36.000	36.000	35.798	35.500	35.300	
Pipe Length		20000	20000	6000	11000	8000	8000	73000 mm
New start of line invert level brought forward		36.625	36.325	35.250	35.220	35.048	34.750	36.625 m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.040	0.080	-0.405 m
Invert level end of line.	36.625	36.525	36.225	35.220	35.165	35.008	34.670	m
Prima facie depth (needs to be min 675)	0.675	0.475	-0.225	0.780	0.633	0.492	0.630	m
Pipe needs to be lowered by to make it work.		0.200	0.975	0.000	0.117	0.258	0.000	-1.550 m
Adopted pit level		36.325	35.250	35.220	35.048	34.750	34.670	34.670 m
Lawful point of discharge							35.460	
Corrigan charged system malfunction in metres							-0.790	m

Manteit has proven that Corrigan has prepared yet another flooded plan.

Corrigan accepted the fact, in Court, as a witness, that both his plans flooded, without raising the proposed pad in the Notice of appeal and Civil Works,

That theory has been found to be false and is canvased in previous exercise.

Goldfish Corrigan and Susan Hedge are so dumb they don't realize that one cannot change -

- The kerb invert level 35.083 and 35.460.
- The rear lot surface level at the boundary
  - Lot 97 AHD 37.300
  - Lot 98 AHD 36.790
  - Lot 99 AHD 35.610
- Cover 450mm
- Pipe width 375mm for velocity over 84 L/s



Corrigan system 2 around 80 litres per second adjusted with correct survey levels								
	Stub 97	Stub 98	Stub 99	Pit 4	Pit 5	Pit 6	Kerb	Cross check
FSL	37.300	36.790	35.610	36.000	35.798	35.500	35.300	
Pipe Length		20000	20000	6000	11000	8000	8000	73000 mm
New start of line invert level brought forward		36.625	35.965	34.785	35.175	34.973	34.675	36.625 m
Min .5% fall, 1% over verge		0.100	0.100	0.030	0.055	0.040	0.080	-0.405 m
Invert level end of line.	36.625	36.525	35.865	34.755	35.120	34.933	34.595	m
Prima facie depth (needs to be min .825, .15)	0.825	0.265	-0.255	1.245	0.678	0.567	0.705	m
Pipe needs to be lowered by to make it work.		0.560	1.080	-0.420	0.147	0.258		-1.625 m
Adopted pit level		35.965	34.785	35.175	34.973	34.675	34.595	34.595 m
Lawful point of discharge							35.460	
Corrigan charged system malfunction in metres							-0.865	m

Above - Corrigan system 2 adjusted using correct surface levels as in the Fall of land Report by Manteit filed 24-3-25.

This makes the Corrigan flooding worse.

**Corrigan and Hedge try to break Council law S7.5.3 (6) - Council will not support rainwater tanks.**

- drainage reserve, but not within road reserves. Only above-ground detention storages will be permitted in Council-owned lands. Tanks in public roads will not be accepted.
- (5) Above-ground detention basins should be integrated with water quality treatments by locating the detention storage requirement above the water quality extended detention depth.
  - (6) Council will not support the installation of on-site (lot-based) stormwater detention facilities in a residential subdivision on each freehold lot as there is no provision to adequately ensure these facilities are protected or maintained into the future.
  - (7) Using stormwater detention tanks in commercial or industrial developments will be permitted where located on lots or within privately owned roads/driveways. Similarly, tanks could be used within roads/driveways owned by community title for residential developments.

**Law broken by Corrigan - S 7.5.3 (6)**

#### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The [QUDM](#) generally describes how it may be determined whether or not a lawful point of discharge exists.
- (2) When land is developed, the roof and surface-water run-off from that land and any external catchment (through the development site) must be discharged to a lawful point of discharge, being:
  - (a) where the location of the discharge is under the lawful control of Council, being:
  - (b)
    - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
    - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.

#### Law broken by Corrigan - S 7.6.1

Susan hedge promoted the goldfish Corrigan

Corrigan has not complied with -

Compliance with the permissible flow width (used 225mm), Should be 375mm if flow is over 84 litres per second.

Compliance with the depth - 790mm under Ashridge Rd.

#### 7.6.3 Stormwater discharge to road reserves

##### 7.6.3.1 Connection to kerb and channel

- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to [BSD-8113](#)).
- (3) Only approved full-height kerb adaptors, complying with [BSD-8114](#) are permitted. The kerb adaptors must be placed in a location where service pits on the footpath will not conflict with the future pipe location.
- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

#### Law broken by Corrigan - S 7.6.3.1



Corrigan plan exceeds 30L/s at kerb since the total discharge from the development including external catchment is >30 L/s

**The development is 812 sqm**

**The external catchment is 1076 sqm + 1076 sqm + 1176 sqm = 3,200 sqm.**

Corrigan is aware that site cover for lot 2 of 310 sqm is maximum 60%.

Site cover is not roof cover. As per Manteit calculations -

**8) Discharge to kerb and channel must be limited to 30 l/s.**

Flow velocity based on Civil Works conservative 60% roof cover

**Lot 98**

**Lot 99**

38 litres per second = >30 l/s

38 litres per second = > 30 l/s

**Civil Works report 31-3-25**

Catchment	Q <sub>1</sub> (m <sup>3</sup> /s)	Q <sub>2</sub> (m <sup>3</sup> /s)	Q <sub>5</sub> (m <sup>3</sup> /s)	Q <sub>10</sub> (m <sup>3</sup> /s)	Q <sub>20</sub> (m <sup>3</sup> /s)	Q <sub>50</sub> (m <sup>3</sup> /s)	Q <sub>100</sub> (m <sup>3</sup> /s)
Existing Site	0.014	0.019	0.026	0.031	0.038	0.049	0.054

#### 7.6.3.1 Connection to kerb and channel

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- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

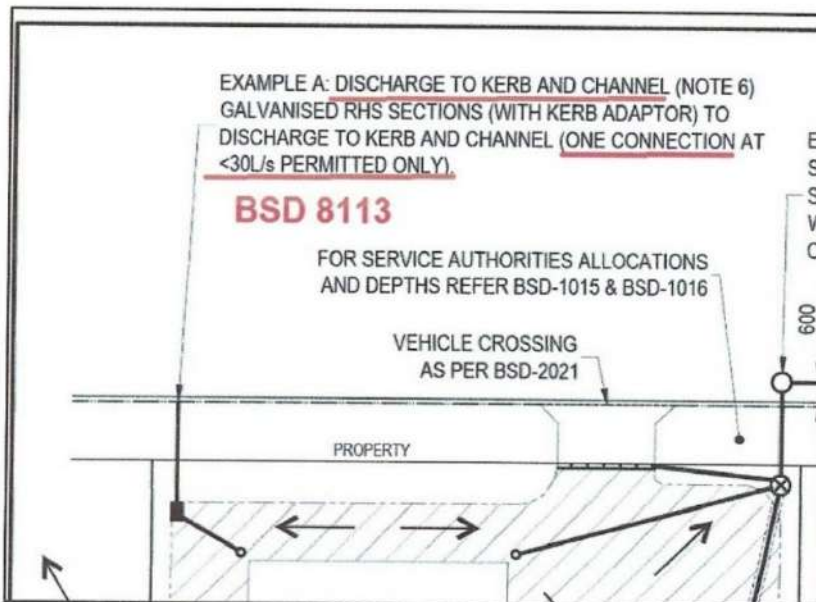
Above - Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30 L/s.

**Law broken by Corrigan - S7.6.3.1**

**BSD 8111**

6. THE PERMITTED TOTAL DISCHARGE FROM THE DEVELOPMENT TO KERB AND CHANNEL, INCLUDING CONTRIBUTION FROM ANY EXTERNAL CATCHMENT, MUST NOT EXCEED 30L/s.

**Law broken by Corrigan - BSD 8111**



**"Discharge to kerb and channel - one connection at 30 L/s permitted only.**

**Law broken by Corrigan - BSD 8113**

**NOTES: BSD 8111**

- DESIGN FLOWS CALCULATED BASED ON MANNING'S 'n' OF 0.011. PIPE SIZED ASSUMING A DISCHARGE OF 15 L/s FROM EACH ALLOTMENT - BASED ON ROOF AREAS OF 250m<sup>2</sup> AND ARI OF 20 YEARS FOR S.E. QUEENSLAND. ALL PIPES SHALL HAVE A MINIMUM DIAMETER OF 150mm, EXCEPT ACROSS FOOTPATH.
- WHERE THE PIPE GRADIENT EXCEEDS 5%, UNDERTAKE A MORE DETAILED HYDRAULIC ANALYSIS INCLUDING THE ASSESSMENT OF STRUCTURE LOSSES, WHERE APPROPRIATE.
- AN EASEMENT IN FAVOUR OF COUNCIL IS REQUIRED WHEN THE ROOFWATER LINE IS DESIGNED TO SERVICE MORE THAN 2 ALLOTMENTS, IRRESPECTIVE OF PIPE SIZE.
- DISCHARGE TO KERB AND CHANNEL MUST BE LIMITED TO 30L/s.



**Above - discharge to kerb and channel must be limited to 30L/s**

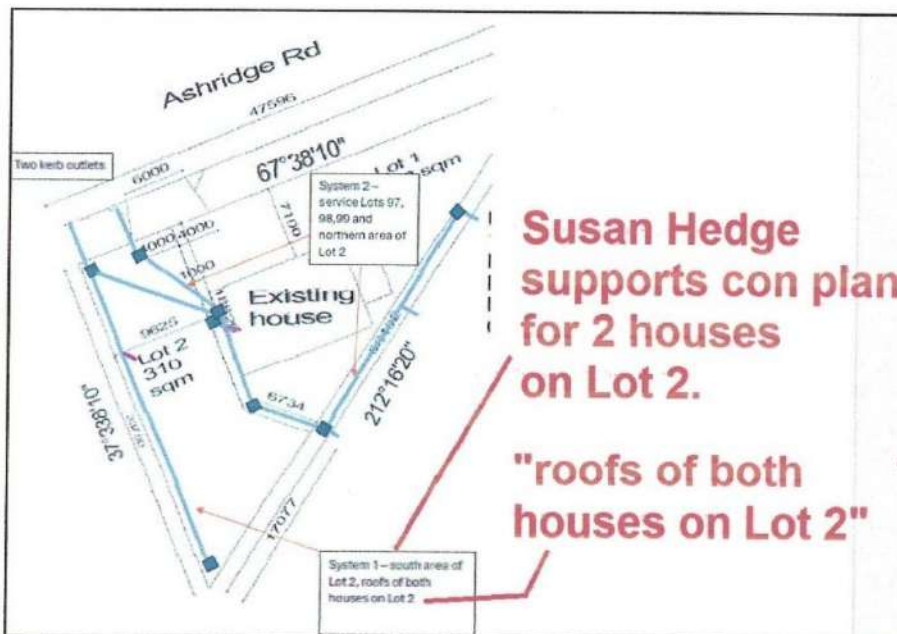
Only one connection to the kerb is allowed

Only <30 l/s is allowed.

### **Law broken by Corrigan - BSD 8111**

#### **65 Permitted development conditions—generally**

- (1) A development condition imposed on a development approval must—
  - (a) be relevant to, but not be an unreasonable imposition on, the development or the use of premises as a consequence of the development; or
  - (b) be reasonably required in relation to the development or the use of premises as a consequence of the development.



**Law broken** - Schedule 2 of the Professional Engineers Act 2002.  
Unsatisfactory professional conduct of a registered professional engineer.

**Law broken** - Unlicensed engineering - S115(1) of the Professional Engineers Act 2002

**The laws broken by Corrigan in flooded plan 3 are similar to Corrigan flooded plan 4.**

Corrigan says he didn't really look at the difference between detention and less detention

**This garbage is what your Lord Mayor Schrinner paid your rates money on.**

Note - all the laws broken by Corrigan for his first flooded plan apply to this flooded plan.



## Extracts of Council and other laws

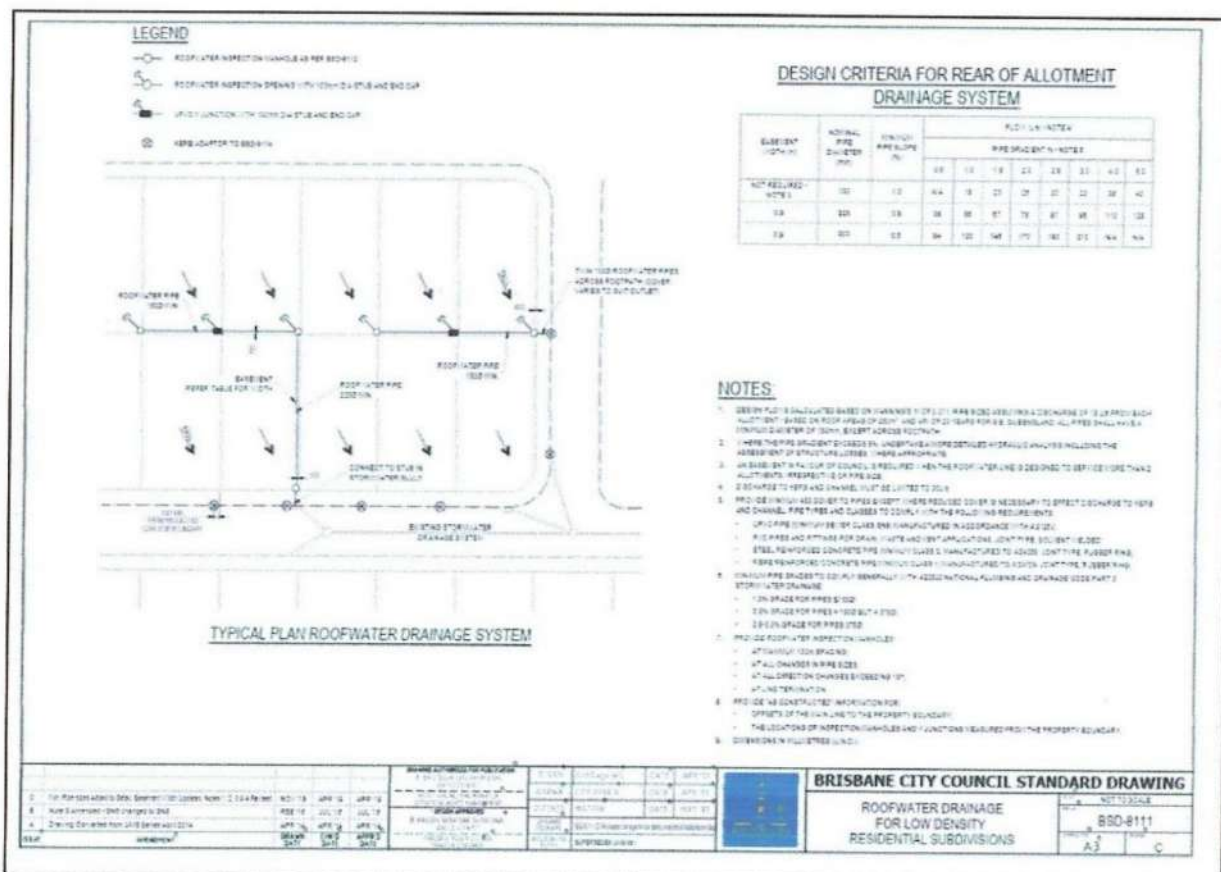
### Existing/future lots

<p><b>PO3</b></p> <p>Development ensures that the stormwater management system does not direct stormwater run-off through <u>existing or proposed lots</u> and property where it is likely to <u>adversely affect the safety of</u>, or <u>cause nuisance to</u> properties.</p>	<p><b>AO3.1</b></p> <p>Development ensures that the location of the stormwater drainage system is contained within a road reserve, drainage reserve, public pathway, <u>park</u> or waterway corridor.</p> <p><b>AO3.2</b></p> <p>Development provides a stormwater management system which is designed in compliance with the standards in the <u>infrastructure design planning scheme policy</u>.</p> <p><b>AO3.3</b></p> <p>Development obtains a lawful point of discharge in compliance with the standards in the <u>infrastructure design planning scheme policy</u>.</p>
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## Upstream drainage

<p><b>PO11</b></p> <p>Development provides for the <u>orderly development of stormwater infrastructure</u> within a catchment, having regard to the:</p> <ul style="list-style-type: none"> <li>a. existing capacity of stormwater infrastructure within and external to the site, and any planned stormwater infrastructure upgrades;</li> <li>b. safe management of stormwater discharge from existing and future up-slope development;</li> <li>c. implication for adjacent and down-slope development.</li> </ul>	<p><b>AO11.1</b></p> <p><u>Development with up-slope external catchment areas provides a drainage connection sized for ultimate catchment conditions that is directed to a lawful point of discharge.</u></p> <p><b>AO11.2</b></p> <p>Development ensures that existing stormwater infrastructure that is undersized is upgraded in compliance with the <u>infrastructure design planning scheme policy.</u></p>
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## BSD 8111



Ryan

29/4/25

have to refer to the small lot code to know what the site cover is. So I understand that less than for a lot less than 200 square meters, the site cover is 80%. Yes.

David Manteit

Okay. So, look, I'm trying to jump ahead and just ask questions, but yeah, tell me if it's not appropriate for you there because, but Mr. Ryan, so ignoring the roof cover, let's just say there's eight and we've got driveways there 3.5 meters let's say uh we've got to make assumptions but you could say that there's um that there's eight lots of 350 square meters let's say knowing the age eight times eight times 186 would you think that'll be fair enough site cover for 186 times eight and possibly 80 percent times 238 that could be a fair sort of um a guide to site cover without any roofs?

Ryan

Well the 80% related to lots less than 200 square metres.

David Manteit

Oh sorry mate, so that would be back to 70% wouldn't it? I think that's right, yeah. So for the front lots it would be 70% site cover. I should be asking the question myself. But that could just as well be one lot anyway. So they could all be 60% site cover, would that be corrected, as a minimum?

Keiran Ryan, in Court advised it would be reasonable for 70% roof cover and sometimes 80%

Corrigan

29/4/25

Corrigan got the wrong wording

those two? I think the wording of 9.92 could probably better say a second option is to reduce or not make use of detention tanks, as shown indicatively in attachment D.

Now the heading at the top of the second option of attachment D says less detention. I didn't really look at what the solution would be for the difference between less detention and no detention. I was just trying to show something indicative as to how you deal with the curb discharges exceeding the maximum that's in the planning scheme.

**Corrigan has no idea how to  
reduce 78 l/s with 2 kerb  
adaptors (2\*30 litres/second =60  
l/s)**





"unsatisfactory professional conduct" for a registered professional engineer, includes the following—

- (a) conduct that is of a lesser standard than that which might reasonably be expected of the registered professional engineer by the public or the engineer's professional peers;
- (b) conduct that demonstrates incompetence, or a lack of adequate knowledge, skill, judgement or care, in the practice of engineering;
- (c) misconduct in a professional respect;
- (d) fraudulent or dishonest behaviour in the practice of engineering;
- (e) other improper or unethical conduct.

## PROFESSIONAL ENGINEERS ACT 2002 - SECT 115

### Who may carry out professional engineering services

#### 115 Who may carry out professional engineering services

(1) A person who is not a practising professional engineer must not carry out professional engineering services.

Penalty—

Maximum penalty—1000 penalty units.

## S115 - Unlicensed engineering

### CRIME AND CORRUPTION ACT 2001 - SECT 15

#### Meaning of corrupt conduct

#### 15 Meaning of corrupt conduct

(1)

"Corrupt conduct" means conduct of a person, regardless of whether the person holds or held an appointment, that—

- (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of—
  - (i) a unit of public administration; or
  - (ii) a person holding an appointment; and
- (b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in *paragraph (a)* in a way that—
  - (i) is not honest or is not impartial; or
  - (ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or
  - (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and
- (c) would, if proved, be—
  - (i) a criminal offence; or
  - (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.

## S15 (1) Crime and Corruption Act 1002

### 7.2.2.3 Drainage

- (1) Council's design standards for stormwater infrastructure vary for different types of land uses. The design standards for roof water, drainage in private roads/driveways and for drainage in roads fronting those types of development are set out in [Table 7.2.2.3.B](#).
- (2) Pipe drainage of on-site roof water and surface water from paved and unpaved areas must comply with [AS/NZS 3500.3:2003 Plumbing and drainage - Stormwater drainage, QUDM for Level III, IV and V drainage standards](#).
- (3) The design of the major system must ensure flows can be conveyed safely. Where the major system is part of a road, this may require increasing the capacity of the minor system above that shown in this table to ensure flow depths and hazard are acceptable (refer to [QUDM](#)).



### PSP 7.2.2.3 Drainage

**Table 7.2.2.3.B—Design standards for drainage systems**

Development category	Design parameter	Minimum design standard	
		AEP	ARI (years)
Rural areas (typically 2–5 dwellings per hectare)	Minor drainage system	39%	2
	Major drainage system	2%	50
Residential developments (Low density residential)	Minor drainage system	39%	2
	Major drainage system	2%	50
	Roof water drainage	Level II <a href="#">QUDM</a>	
Residential developments (Low–medium density to High density)	Minor drainage system	10%	10
	Major drainage system	2%	50
	Roof water drainage	Level III and Level IV <a href="#">QUDM</a>	
Industrial uses	Minor drainage system	39%	2
	Major drainage system	2%	50
	Roof water and lot drainage	Level IV <a href="#">QUDM</a>	
Commercial land uses (centre zones)	Minor drainage system	10%	10
	Major drainage system	2%	50
	Roof water and lot drainage	Level IV and V <a href="#">QUDM</a>	

**Table 7.2.2.3.B - Design standards for drainage systems**

**Table 7.2.3.A— Minimum size of roof-water lines for low density residential development**

No. of lots (nominal 250m <sup>2</sup> roof area at each lot)	Minimum pipe diameter	Easement width	Minimum pipe slope
1–2	150mm	Not required	1%
3–4	225mm	1.5m	0.5%
5–6	300mm	1.5m	0.5%

**Table 7.2.3A - gradients**

#### 7.3.2 Flow estimation methods

For guidance to the design of urban drainage systems Council refers the designer to QUDM and Australian Rainfall and Run-off. Council will accept flow estimations using the rational method, calibrated run-off routing models, calibrated time-area routing models and calibrated direct rainfall hydraulic models. For complex drainage situations (particularly as part of a flood study for setting building development levels) or for sizing stormwater detention systems, a run-off storage routing model must be used to estimate flows and/or analyse the hydraulics of an urban drainage system.

Table 7.3.2

**7.3.2 Flow estimation methods**

For guidance to the design of urban drainage systems Council refers the designer to QUDM and Australian Rainfall and Run-off. Council will accept flow estimations using the rational method, calibrated run-off routing models, calibrated time-area routing models and calibrated direct rainfall hydraulic models. For complex drainage situations (particularly as part of a flood study for setting building development levels) or for sizing stormwater detention systems, a run-off storage routing model must be used to estimate flows and/or analyse the hydraulics of an urban drainage system.

**PSP 7.3.2 - Council refers the designer to QUDM****Table 7.3.3.1A—Coefficient of discharge C10 for development**

Development category	C10
Central business areas (including in the Principal centre zone and Major centre zone)	0.90
Industrial uses and other commercial uses (including in the District centre zone and Neighbourhood centre zone)	0.88
Significant paved areas (e.g. roads and car parks)	0.88
Medium density and high density residential land uses	0.88
Low-medium density residential land uses	0.87
Low density residential area (including roads)	
Average lot $\geq 750\text{m}^2$	0.82
Average lot $\geq 600\text{m}^2 < 750\text{m}^2$	0.85
Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.86
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.87
Low density residential area (infill subdivision excluding roads)	
Average lot $\geq 750\text{m}^2$	0.81
Average lot $\geq 600\text{m}^2 < 750\text{m}^2$	0.82
Average lot $\geq 450\text{m}^2 < 600\text{m}^2$	0.83
Average lot $\geq 300\text{m}^2 < 450\text{m}^2$	0.85
Rural/environmental protection areas (2–5 dwellings per ha)	0.74
Open space areas (e.g. parks with predominately vegetated surfaces)	QUDM, Table 4.05.3(b)

**Table 7.3.3.1A - Coefficient of discharge C10 for development****7.3.3 Rational method assumptions**

Where the rational method is suitable for flow estimation, the design is to be in accordance with QUDM and the following sections.



### PSP S7.3.3 rational method to be used

#### 7.4.7 Building near or over underground stormwater infrastructure

- (1) For underground stormwater facilities with or without drainage easements and where pipes or conduits are greater than or equal to 225mm in diameter or width, building over/near stormwater requirements will be applicable if the site is subject to any 1 or more of the following conditions:
  - (a) any proposed works contravening the drainage easement terms;
  - (b) any earthworks (filling or excavation) proposed directly over or adjacent to the stormwater drainage or maintenance holes that will result in changes to surface levels or loading conditions over these stormwater facilities;
  - (c) any building work proposed over the stormwater drainage or maintenance holes;
  - (d) any proposed works that will affect the structural integrity of the drainage or its trench;
  - (e) proposed changes to the loading conditions on an existing maintenance hole cover, for example, changing the use of a non-vehicular trafficable area to a vehicular trafficable area;
  - (f) proposed use of rock bolts or ground anchors within 2m of the stormwater drainage;
  - (g) proposed property access width of less than 2m from the front entrance or access road to any maintenance hole or property connection located on site;
  - (h) proposed driveways or concrete pavements over maintenance holes or property connections;

- (i) clashing of services or utilities (other than sewers) with the stormwater drain line that may affect the structural integrity of the stormwater drainline or its trench, or sewers larger than 150mm diameter crossing any stormwater drainline.
- (2) When building over stormwater an adequate buffer zone is required between the edge of foundation system and the edge of the stormwater infrastructure to minimise structural damage during excavation, boring or piling operations.
- (3) The following minimum horizontal clearances are required where undertaking such works near stormwater infrastructure and may need to be increased if it is anticipated that the pipe bedding will be affected:
  - (a) 1m clearance applies to an excavated footing system such as beams and pad footings excavated by backhoe or similar;
  - (b) 1m clearance applies to bored piers;
  - (c) 6m clearance applies to driven, vibrated or jacked piles.
- (4) Works shall be carried out in accordance with section 7.2.9 of [AS/NZS 3500.3:2003 Plumbing and drainage - Stormwater drainage](#). Typically, where a drain is laid near to a footing, the trench shall be located beyond a 45° angle from the base of the footing, as shown by [Figure 7.4.7 A z](#).
- (5) When determining the minimum setback from existing stormwater infrastructure, allowance needs to be made for future upgrading of the pipeline to meet Council's design standards where this pipeline is undersized.

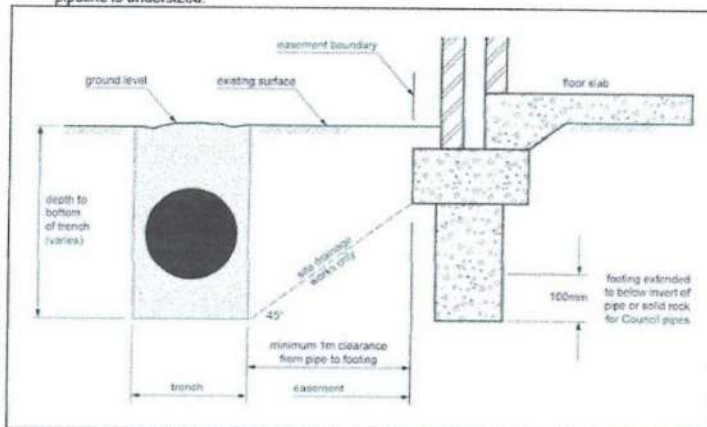


Figure 7.4.7a—Building near and over stormwater and subsol drains

#### 7.4.8 Building near or over aboveground stormwater infrastructure

### PSP S7.4.7

### 7.5.3 General requirements

- (1) The design of stormwater detention and retention systems is to refer to QUDM section 5.0 for all design elements including but not limited to embankments, spillways, low and high flow outlets, freeboard, basin grade and scour control.
- (2) Stormwater detention is offline to existing creeks/flow paths and external catchments.
- (3) Where an online system is proposed, it must provide regional benefits to flow reduction and be designed for ultimate catchment development. These basins will require incorporation of natural low flow channels, riparian vegetation and use of weir outlets (no piped low flow outlet) to promote fauna movement and reduce likelihood of outlet blockages.
- (4) Where stormwater from any public asset such as a road reserve is directed into a stormwater detention system, these detention systems must be located within public land such as a park or

### PSP S 7.5.3

- drainage reserve, but not within road reserves. Only above-ground detention storages will be permitted in Council-owned lands. Tanks in public roads will not be accepted.
- (5) Above-ground detention basins should be integrated with water quality treatments by locating the detention storage requirement above the water quality extended detention depth.
  - (6) Council will not support the installation of on-site (lot-based) stormwater detention facilities in a residential subdivision on each freehold lot as there is no provision to adequately ensure these facilities are protected or maintained into the future.
  - (7) Using stormwater detention tanks in commercial or industrial developments will be permitted where located on lots or within privately owned roads/driveways. Similarly, tanks could be used within roads/driveways owned by community title for residential developments.

### PSP S 7.5.3 (6)

#### 7.6.1 Lawful point of discharge

- (1) The objective of achieving a lawful point of discharge is to ensure that any stormwater discharge will not cause an actionable nuisance (i.e. a nuisance for which the current or some future neighbouring proprietor may bring an action or claim for damages arising out of the nuisance). The QUDM generally describes how it may be determined whether or not a lawful point of discharge exists.
- (2) When land is developed, the roof and surface-water run-off from that land and any external catchment (through the development site) must be discharged to a lawful point of discharge, being:
  - (a) where the location of the discharge is under the lawful control of Council, being:
  - (b)
    - (i) a Council-owned open space asset such as a park or drainage reserve provided the concentration of stormwater does not adversely affect the drainage capacity of the asset and/or impact on adjoining properties; or
    - (ii) a road reserve, including the kerb and channel and compliance with the permissible flow width, flow depth and hazard.




### 7.6.3 Stormwater discharge to road reserves

#### 7.6.3.1 Connection to kerb and channel

- (1) The maximum permissible discharge to the kerb and channel must be limited to 30L/s (i.e. maximum 2 single house lots per discharge point dependent on roof area), and twin 100mm diameter pipes (equivalent 150mm diameter) with approved kerb adaptors.
- (2) For development that is a material change of use (i.e. other than (1) above), Level III drainage (connection to kerb and channel) is only permitted if the total discharge from the development including any external catchment does not exceed 30L/s. Multiple hot dip galvanised rectangular hollow sections (RHS) 125/150/200mm wide x 75mm or 100mm high must be used (refer to BSD-8113).
- (3) Only approved full-height kerb adaptors, complying with BSD-8114 are permitted. The kerb adaptors must be placed in a location where service pits on the footpath will not conflict with the future pipe location.
- (4) Discharge into the high side kerb of a one-way crossfall street is generally not permitted for any development other than a single-house dwelling.

### PSP S7.6.3.1 - limited to 30 L/s at kerb including any external catchment.

 Queensland Consolidated Acts

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**BUILDING ACT 1975 - SECT 5**

What is building work

5 What is building work:

(1) "Building work" is—

- (a) building, repairing, altering, underpinning (whether by vertical or lateral support), moving or demolishing a building or other structure; or
- (b) excavating or filling—
  - (i) for, or incidental to, the activities mentioned in paragraph (a); or
  - (ii) that may adversely affect the stability of a building or other structure, whether on the land on which the building or other structure is situated or on adjoining land; or
- (c) supporting, whether vertically or laterally, land for activities mentioned in paragraph (a); or
- (d) other work regulated under the building assessment provisions.

(2) For subsection (1) (d), work includes a management procedure or other activity relating to a building or structure even though the activity does not involve a structural change to the building or structure.

### Disclaimer

Information has been provided for discussion and is true and correct to the best of my ability.

In the conversion of the audio to transcript it is usual that a slight murmur of the top of someone else like "yeah" might not have appeared for example. (As stated by Judge Williamson KC) Anyone can obtain an audio, to check. So no one can hide.

Any statement or allegations are only allegations until acknowledge, or proven in Court. The thing is, that Susan Hedge has provided a great deal of accusations herself.

The contents of this affidavit are true, except where they are stated on the basis of information and belief, in which case they are true to the best of my knowledge.

I understand that a person who makes an affidavit that the person knows is false in a material particular commits an offence.

Affirmed by the said deponent at Richlands this 26<sup>th</sup> day of November , 2025.

Before me.



DEPONENT

  
JUSTICE OF THE PEACE