Oaths Act 1867

STATUTORY DECLARATION

QUEENSLAND TO WIT

	tive Officer of Tennis Queensland, do solemnly and sincerely declare that:
1	I am in receipt of a notice from the Queensland Floods Commission of Inquiry signed by the Commissioner Justice C E Holmes dated the 22 nd of August 2011 to provide all information in my possession and commentary and opinion which I am qualified to give appropriate to the topics raised in the notice.
2	I have been the Chief Executive Officer of Tennis Queensland (TQ) and the Tournament Director for the Brisbane International since 1 st July 2010.
3	TQ identified a number of locations as a potential site for the State Tennis Centre (STC). Tennyson was one of these locations. It was the State Government who determined that the STC would be located at Tennyson and that decision was supported by TQ. TQ was aware that part of the site was below the Q100 flood line.
4	As I have only been the CEO of Tennis Queensland since 1 st July 2010, I have made enquiries of the two previous Chief Executive Officers of TQ Mr Steve Ayles and Mr Tom Larner, and the immediate past President of TQ Mr Ashley Cooper in an attempt to provide a full response to the enquiries raised.
5	I am advised by Mr Tom Larner that a map showing flood levels was tabled at a meeting between Mirvac, Stadiums Queensland and TQ at some stage during the planning and construction period. He does not have a clear recollection of when this meeting was held, or the plan that was tabled. TQ does not have on its files a copy of that plan. Annexure B contains a flood map which may be the same map.
6	I am not aware of any information provided to TQ by the Mirvac Group, the State of Queensland or the Brisbane City Council or any consultant engaged by any of them regarding the flood risk.
7	As far as I am aware (and as far as I have been informed) no independent investigation was instigated by TQ prior to the construction of the STC. There is no reason why TQ would have undertaken such further investigation.
8	After the State of Queensland determined that the STC would be located at Tennyson, a process was undertaken whereby the development was to be put to tender and the successful tenderer would then develop the STC. The role of TQ in this was to provide advice in relation to tennis related matters, in particular, the requirements for conducting major tennis tournaments such as the Brisbane international and/or Davis Cup at the STC and requirements of year round.

I am aware that the original Development Application contained conditions in relation

to flooding and a copy of the condition relevant to the issue of flooding from the Development Approval is annexed hereto and marked "A".

QFCI
Date: 27/09/II
Exhibit Number: 628

W:\109458\1452425.doc

9

community tennis related activities at the STC.

- TQ occupies the STC pursuant to leases granted by the Stadiums Queensland dated the 1st December 2008.
- TQ is aware that the grass and clay courts were below the Q100 line, and whilst it would be undesirable for these courts to be affected by flood, these courts could be reinstated, and the cost of reinstatement of these courts due to the nature of them would be less than the reinstatement of other plexicushion courts.
- TQ is aware that the plexicushion courts (the blue external courts) were built above the Q100 level. I am advised by Mr Ashley Cooper that the site of those courts was filled to bring the level of those courts above the Q100 line. This was considered to be important given that the cost of reinstating those courts, if they were damaged by floods, would have been higher than those clay and grass courts.
- TQ is aware that the centre court was below the Q100 line, and is aware that precautions had been taken in the design to prevent water entering the court through the installation of flood gates.
- In October 2009 a Flood Emergency Response Plan was created. This report was prepared to the requirements of TQ in conjunction with Stadiums Queensland, and it was based upon information provided and obtained through consultation during 2009. This report was prepared by Marsh Pty Ltd. This document included the plans of the STC showing RL levels and showing the Q100 and Q50 flood levels. This plan is annexed hereto and marked "B".
- In addition to the Flood Emergency Response Plan there was also a Flood Management Policy adopted by TQ. I am not aware of the date of adoption of this policy. The policy is in many respects a synopsis of the Flood Emergency Response Plans. A copy of this document is annexed hereto and marked "C".
- The Brisbane International Tournament has no separate Flood Management Plans or Policy. The Tournament as would be expected relies upon the Stadiums plans and policies in this regard.
- The Brisbane International Tournament is not sanctioned by the ATP Tour and WTA Tour as an indoor event. It is sanctioned as an outdoor event notwithstanding that the venue has a roof.
- Outdoor events are affected by weather. Due to the nature of the ATP Tour and WTA Tour and the commitments which players have to other events, it is not possible to simply postpone the completion of an event until the conditions are acceptable. It is understood that whilst it would be a rare event, there are some tournaments which are not completed. It is not a requirement of the ATP and WTA Tour that there is a plan in place which guarantees the completion of an event. Naturally it is understood that all parties will use their best endeavours to achieve the finalisation of the event.
- Those parts of the centre which were inundated by flood waters are shown on the photograph taken on the 13th of January 2011 annexed hereto and marked "D" at almost the height of the flood. The Centre Court which is shown on the diagram was also inundated by water. The QTC car park, four clay courts, two grass courts, centre court, multi-purpose room, temporary storage rooms, facility maintenance office and workshop, player locker rooms, gymnasium and cleaners storeroom were inundated around four metres of water. Seven of the plexicushion courts were covered in whole or part by approximately 200 millimetres of water and nine

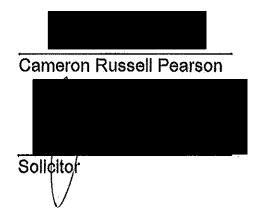
- plexicushion courts were partially covered by water being those which still appear in blue on the photograph as well as the two under the sunshades.
- I have prepared a summary of the property damage caused and this summary is annexed hereto marked "E".
- In relation to access to the STC, King Arthur Terrace was closed at the Fairfield Road End and was cut at the bridge over Oxley Creek. Tennyson Memorial Drive was under water which meant that the STC was effectively cut off completely from road access for approximately 24-48 hours.
- TQ is not aware of any structural damage done to any parts of the STC.
- I was in communication with Stadiums Queensland. Stadiums Queensland indicated their proposed course of action pursuant to the Lease. TQ was given formal notice dated 20th January 2011, received on the 25th of January 2011, that pursuant to the lease Stadiums Queensland intended to repair parts of the premises, and that parts of the STC pursuant to the lease would remain closed for a period to undertake these remediation works. Annexed hereto and marked "F" is copies of the notifications received from Stadiums Queensland.
- TQ received formal notification from Stadiums Queensland on the 7th February 2011 advising that TQ was able to resume or partially resume access to and use of the STC. Annexed hereto and marked with the letter "G" are copies of the notifications received from Stadiums Queensland.
- The STC was closed from approximately 12 noon on the 11th of January 2011 and partially reopened at 8:00am on Monday the 7th of February 2011.
- The remediation works have been undertaken by Stadiums Queensland. I do not have specifics as to exactly was undertaken in relation to the remediation which occurred to enable the centre to be partially reopened.
- As part of the remediation, the floodgates have been reviewed with a view to addressing the issue of mitigation of future floods.
- The Brisbane International Tournament is scheduled to commence on 1st January 2012 and all remediation work to the STC will have been completed by that time. The anticipated completion date of the works is end of November.
- Currently the grass courts, clay courts and centre court are still out of use. The grass and clay courts are likely to be re-opened in late September early October. The areas of the STC which remain closed as at today are set out in the schedule annexed hereto and marked "H".
- Once the remediation work is complete, I do not see any long-term impact on the site.
- 31 There was no risk to life in relation to the flooding of the STC.
- TQ is grateful to the Landlord, Stadiums Queensland, for its efforts both in having the STC partially reopened and in relation to its work to remediate the balance of the facility.

- TQ is grateful for the efforts of TQ staff over this period. TQ was pleased with the efficiency of the cleanup and the fact that the STC was available for community use by the 7th February 2011.
- I have reviewed the terms of reference of the Commission and I have no further comments to make on any of the topics.
- There are no other matters or topics relevant to the terms of reference of the Commission which I believe require comment from me.

And I make this solemn declaration conscientiously believing the same to be true and by virtue of the provisions of the Oaths Act 1867.



This is the annexure marked "A" referred to in the Statutory Declaration of Cameron Russell Pearson made the 2 day of September 2011.





Dedicated to a better Brisbane

11 SEP 2008

Ms Leila Jumnoodoo Mirvac Queensland Pty Ltd C/- Brannock & Associates GPO Box 552 BRISBANE QLD 4001

COUNCIL DELEGATE DECISION MADE ON - 8 SEP 2008 **Brisbane City Council**

Development Assessment Branch City Planning and Sustainability Division GPO Box 1434 Brisbane Qld 4001

Telephone 07 3403 8888

Dear Ms Jumnoodoo

Re: Request to Change or Cancel Conditions Under Section 3.5.33 of the Integrated Planning Act 1997 for Stage 1 Tennyson Riverside Development at 27 Softstone St Tennyson Qld 4105 and 681 Fairfield Rd Yeerongpilly Qld 4105 on land described as Lot 1 on SP 164685 and Lot 566 on SP 104107

Application Reference: Modification No. A002132525 (previously 933802;DA)

I wish to advise that your request dated 26 May 2008 to change or cancel conditions for the above component of the development application has been approved by the Council's Delegate.

I have enclosed a modified development conditions package incorporating the changes to the conditions outlined below that now replaces the previous conditions package issued on 1 August 2008 with Council reference A002118357.

The following changes were made to the conditions:

 Condition (113) Gymnasium was deleted and the requirement for the location and use of the gym are now in a separate component of the approved DA package. This will provide a more robust approval when other parts of the preliminary approval are exercised for residential development on the site.

The following drawings were replaced:

- Gymnasium Site Plan, Drawing Number 01 DA1000 Rev B
- Gymnasium Lower Level Floor Plan, Drawing Number 01 DA1010 Rev C
- Gymnasium Upper Level Floor Plan, Drawing Number 01 DA1011 Rev I
- Gymnasium Elevations, Drawing Number 01 DA1600 Rev G

I have attached an extract from the *Integrated Planning Act 1997* advising you of your right to appeal to the Planning and Environment Court.

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

Yours sincerely

Shirley Shannon
Senior Urban Planner, Development Assessment
Development Assessment South BSQ

Development Assessment Branch

original DA - QTC

- Manoeuvring on site for a LRV and for the loading and unloading of the vehicle (s);
- Parking on the site for a minimum of 184 tenant cars, 24 visitor cars and for the loading and unloading of vehicles within the site;
- e. 2 of the above parking spaces are to be provided for people with disabilities;

 f. One (1) visitor parking space is to be provided and signed for exclusive use by
- One (1) visitor parking space is to be provided and signed for exclusive use by the on-site manager unit located in Building D.
- g. Supply, install and maintain within an area to be determined by the Delegate, Development Assessment, artworks (including but not necessarily limited to, sculptures, ceramic works, mosaics, wall reliefs, relic of the sites previous use/s, interpretive signage) by a recognised artist or crafts person or the appropriate professional depending on the Item Installed;
- A height clearance sign located at the entrance(s) to undercover car parking areas:
- A directional visitor parking sign at the vehicle entrance to the site adjacent to or clearly visible from the vehicle entrance to the site;
- An appropriate area for the storage and collection of refuse, including recyclables, in a position which is accessible to service vehicles on the site;
- The internal paved areas are to be signed and delineated in accordance with the approved plans, Manual of Uniform Traffic Control Devices and Austroads.

GUIDELINE

The "Brisbane City Plen 2000 - Transport, Access, Parking and Servicing Planning Polloy" requires adequate on-site provision of parking, servicing and manoeuvring areas. This condition specifies detailed design requirements as indicated on the approved drawings and documents to which the approvel relates.

221) Flooding - Q50 & Q100

Run off from the site and run off concentrated on the site from local catchments for storms up to the 50 year (ARI) flood event and for a 100 year (ARI) flood event for creek and river flooding, is to be managed in accordance with approved drainage plans and Council's "Subdivision and Development Guidelines" so as not to have any adverse effect on neighbouring properties.

- Design and construct all buildings to have the appropriate freeboard in accordance with the Council's "Subdivision and Development Guidelines" so as not to be flooded during a 50 year (ARI) local flood event or a 100 year (ARI) creek or river flood event whichever is the higher flood level;
- b. Submit engineering plans and calculations, prepared by a Registered Professional Engineer Qld (RPEQ) and in accordance with the Council's "Subdivision and Development Guidélines", demonstrating how the development will comply with this requirement. Such plans are to show adequate survey information on areas adjoining the site with particular attention to ponding of water and overland flowpaths and building pads. Additionally, the submitted information is to determine the extent of any stormwater drainage works and the width of any overland flow easements. Obtain approval for the design from the Engineering Delegate, Development Assessment, Development and Regulatory Services;
- Prior to the commencement of the use, complete the works in accordance with the approved engineering plans; and
- d. Prior to the commencement of the use, submit "As Constructed" plans including an asset register (if required), approved by a Registered Professional Engineer of Queensland (RPEQ) (to a standard specified in Council's "Subdivision and Development Guidelines") certifying that the works have been completed in accordance with the approved design and any approved modifications.

GUIDELINE

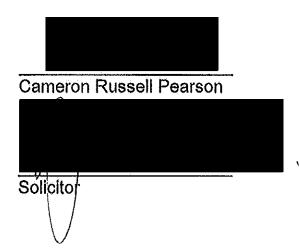
This condition is intended to ensure that the design of the subject development accounts for the stormwater run off end/or if stormwater drainage patterns in the vicinity of the site require improvements. For any enquiries about this condition, please contact the Engineering Delegate, Development and Regulatory Services,

222) Floor Levels

Design and construct all proposed buildings in accordance with Council's "Subdivision and Development Guidelines" to ensure that minimum habitable floor levels are 500 mm abovethe 100 year (ARI) flood level (river and creek flooding) or 500mm above

Prior to lodging an application for Building Works

Prior to lodging an application for Building Works This is the annexure marked "B" referred to in the Statutory Declaration of Cameron Russell Pearson made the day of September 2011.



October 2009

Flood Emergency Response Plan (FERP)

Queensland Tennis Centre / Tennis Queensland

MARSH



Contents

1.	Policy	3
2.	The Hazard Indicators of a Flood Event Observed / Prédicted River Heights & Flood Warnings Plan Activation	5 6
3.	Plan Preparation Activities Training	10
<i>4.</i> 5.	The Pian	12 13 14 18
6.	Appendices	
	pendix A: Brisbane City Council Floodwise Property Report pendix B: Venue Flood Level Plan	
	pendix C: Flood Checklist pendix D: Record of FERP Training	
	pendix E: Key Contact List - External pendix F: Flood Barrier Manual	
۸n۰	nandly Gt. Level 1 and 2 Doom Inventory	

2

The Hazard

Queensland Tennis Centre is located approximately 100 m from the Brisbane River. Flooding along the Brisbane River is caused by both heavy rainfall in Brisbane and the hills surrounding Brisbane. The river is also subject to tidal influences. Whilst flooding might be predicted to usually occur in the rainy season, flooding can occur all year round.

The highest flooding source is the Brisbane River. Brisbane City Council generated analysis has provided the following flood level analysis for the venue (refer to Appendix A for complete report)

Measure	Height	Notes
Minimum Ground Level at venue	3.1 m AHD ²	
Maximum Ground Level at venue	13,7 m AHD	
Highest Defined Flood Level (DFL)	7.9 m AHD	The flood event adopted by a local authority for management of development.
Approximate depth of flooding on this property	4.8 m	
(ie DFL less minimum ground level)		
Minimum habitable floor level	8.4 m AHD	Podium level is 9.6 m AHD
(ie, Highest defined flood level (DFL) in metres + 500mm)	•	The top of the drive way in south east corner of venue (le, where flood barrier is to be filted) is est. 6.68m AHD

¹ Brisbane City Council - Floodwise Property Report - Report Reference 797593 - Dated 13 March 2009

² AHD – Australian Height Datum – The national vertical/height benchmarking survey reference based on mean (average) sea level.

Source	Access	Contact Information
Television	Watch out for televised weather updates	All free-to-air channels The Weather Channel (Foxtel /Austar)
Local Response Organisations	Refer Key Contacts List	These include the Councils, Police and State Emergency Services in the local area
Telephone	Flood Warnings are available through a recorded voice retrieval system, along with a wide range of other weather related and climate information.	Flood Warnings Tel: 1300 659 219 Tropical Cyclone warnings Tel: 1300 659 212
Stadlums Queensland		Contact Stadiums Queensland GM Assets and/or Venue Manager QSAC

NOTE: Brisbane City Council is currently developing an online flood monitoring service – "Floodwise" - which is only currently available to selected emergency response people. Access to this service by the venue should be further investigated.

Observed / Predicted River Heights & Flood Warnings

For the Brisbane River and creeks where specialised rainfall and river height gauges have been installed, flood warnings and river height bulletins will describe flooding as 'Minor', 'Moderate' or 'Major'. The following table describes these terms in more detail:

Warning	Description
Minor Flooding	Causes inconvenience. Low-lying areas next to watercourses are inundated which may require the removal of stock and equipment. Minor roads may be closed and low level bridges submerged.
Moderate Flooding	In addition to the above, the evacuation of some houses may be required. Main traffic routes may be cut by flood waters
Major Flooding	In addition to the above, extensive areas are inundated. Properties and suburbs are likely to be isolated and major traffic route likely to be closed. Evacuation of people from flood affected areas may be required.

ARI ³ Flood Level	Height	Venue Areas Impacted ⁴	
500 Year	<9.00 m AHD ⁶	Same as 100 year ARI but water crests flood barrier and/or enters stadium basement ports (approx 8.0-8.4 m AHD). Potentially, water covers upper level court as well (9.0 m AHD).	
Highest DFL AHD ⁶ east of the eastern retaining v		A 1:100 yr flood event will inundate the eastern end of the venue (ie, east of the eastern retaining wall). Areas impacted will include lower tennis courts (5.2-5.4 m AHD) and car parking areas.	
		The flood waters are estimated to rise to 7.9 m AHD, a level above the top of the venue service road (south east corner - 6.90 m AHD) but below the top of the flood barrier (8.2 m AHD) and below the ventilation ports (approx 8.0-8.4 m AHD) in the eastern retaining wall and maintenance shed (8.0 m AHD).	
		Plan includes procedure for implementing flood barrier.	
		Note - Centre Court/Level 1 is 4.5 m AHD.	
50 Year	6.6 m AHD ⁶	A 1:50 yr flood event will inundate the eastern end of the venue (ie, east of the eastern retaining wall). Area impacted will include lower tennis courts (5,2-5.4 m AHD) and car parking areas.	
	•	The flood waters are estimated to rise to 6.6 m AHD, a level just below the top of the venue service road (south east corner - 6.9 m AHD).	
		Plan includes procedure for implementing flood barrier.	
20 Year	4.4 m [*] AHD ⁶	•	

All measurements are as provided to Marsh by Affiliated FM, unless otherwise indicated.

Refer to Appendix B for site plans with overlay of flood scenarios.

Knowledge of the river gauge survey data, the above ARI data and the predicted river heights will allow the CEO to make an informed assessment of the venue's exposure to the flood event and any requirement to activate the FERP.

³ ARI – Average Recurrence Interval - The probability of experiencing a flood of a particular magnitude is expressed an ARI in years. See Appendix A for Floodwise report containing all definitions

⁴ Based on Affiliated FM surveys

⁵ Source: Affiliated FM data

⁶ Source: Brisbane City Council flood wise report

3

Plan Preparation

Activities

The following actions should be undertaken in preparation for the implementation of this FERP:

- Undertake an annual review of the plan and action steps
- Undertake training of key venue management and staff
- Assignment of a flood defences inventory (le, barriers, sand bagging)
- Implementing a reliable flood monitoring system that gives adequate warning time thus allowing the plan to be successfully completed.

The CEO Tennis Queensland is responsible for actioning the above items. The following sets out a time scale for undertaking the above:

Timing	Responsibility	Action
June and December of Every Year	CEO / Facilities Development Manager	 Review the FERP and update as required. Review room allocations on each level and reallocate responsibilities with FERP as required. Update inventory Lists for each room
July of Every Year	Head Groundsman	 Take out flood mitigation gates for testing and training in implementation of barriers. Review water pumps to ensure operability (ongoing maintenance) Ensure sufficient stock of sand bags and sand at venue
July of Every Year	CEO	 Working with Stadiums Queensland, review / lialse with Brisbane City Council's Flood Forecasting and Warning System department and review warning system and method



The Plan

Objective and Timings

The objective of this FERP is to reduce the damage to the venue and business interruption by planning for the flood event in advance. The Venue will raise or relocate key items above the 100 yr. level where practical.

Assuming the venue has 48 hour warning of a flood event, this plan has been set up to accomplish all of its actions in 36 hrs, leaving a 12 hrs period to respond to unforeseen problems or the uncertainty of the flood prediction. The plan is activated immediately following issuance of a flood warning by the CEO Tennis Queensland as a result of information obtained from monitoring and interpreting flood warning sources.

This plan's time line is built around when the flood warning is issued:

- Severe flood warning issued = 0 hrs,
- Targeted time to have plan ready = 36 hrs,
- Predicted time the flood hits = 48 hrs

NOTE – this plan has been set up such that the flood warning is 48 hours. However, if the warning is less than this, then the plan's timing will be updated under the CEO Tennis Queensland's guidance.

Activation and key responsibilities

The following sets out the authority for activation of the FERP and those personnel with key responsibilities within the plan:

Activation of FERP

 The CEO of Tennis Queensland is in charge of the overall plan and has the authority to activate the plan. The following venue personnel will ensure that key stakeholders are advised of the FERP's activation:

Functional Area	Position	To be notified of FERP activation
Tennis Queensland	CEO	 Stadiums Queensland GM Operations
		 Stadlums Queensland (QSAC) Venue Manager
ı		 Tennis Queensland President
•	•	■ Tennis Australia CEO
	,	 Tennis Queensland management and staff
	•	National Academy Manager
		 Brisbane International Tournament Director
Tennyson Stadium Venue Management (UQ Sport)	Venue Manager	 University of Queensland venue personnel (including Pro Shop, Café, Court Bookings, Coaches)
•		 University of Queensland Sport management
Nalional Academy	National Academy Manager	 National Academy management and staff
Brisbane International	Tournament Director	 Events team

Appendix E includes a list of phone numbers for other key emergency agencies and contractors.

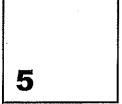
The Plan's Actions

Once a Severe Flood Warning has been issued, the following actions (see over) are the key pre-planned emergency actions that are designed to reduce the loss. These key actions can be split into four categories:

- keeping flood waters out of buildings
- keeping flood waters away from equipment, stock and supplies
- limiting damage to the venue (if water can not be kept away),
- reducing the recovery time.

Each task details the action required, when the action should be undertaken and who is responsible for the action. Actions have been prioritised based on 48 hours warning – however should this be reduced then the actions will require re-prioritising under the guidance of the CEO Tennis Queensland.

Time after issuance of Venue Flood Warning 2 hrs. (this action may take 60 mins to complete)	Responsibility for Action Facilities Development Manager	Action Facilities Development Manager in conjunction with key venue management: Arrange for relocation of cars from eastern car park Lialse with council in closing off road access Lialse with plumber in switching off sewer pumps at
2 hrs. (this action may take 30 mins to complete)	CEO Tennis Queensland	board (nb, sewer inlets have reflux yalves). Install signage advising of closure to facilities. CEO in conjunction with key venue management to arrange for specialist contractors required as part of relocation of Level 1 contents (as required), including: Electricians; Gas; IT
3 hrs. (this action may take 24- 36 hrs. to complete)	CEO Tennis Queensland	CEO in conjunction with key venue management to start relocation of Level 1 equipment / stock / storage followed by Level 2 (dep. on predicted flood level) - see Appendix G. Relocate contents to Level 3 using lifts / trolleys as appropriate. Review security arrangements. Utilise specialist contractors where required (ie, heavy gym equipment). NB - Cleaning chemicals also stored on Level 1
3 hrs	Groundsman	 Groundsman to give sump pumps final check to ensure they are operational. Note: SW sump pump at rear of stadium discharges to main SW line that runs in between the show courts and the western podlum which in turn runs out to the river Power supply for sump pump is fed by the western transformer
24 hrs.	CEO Tennis Queensland	The CEO will determine need for alternative office location (ie, off site room) for the next few weeks that is able to handle 15 people Office Manager to source off-site location
24 hrs (this action may take 4 hrs. to complete)	Office Manager	Under Instruction from CEO, the Office Manager will coordinate the relocation of office equipment and supplies that will be used in the recovery off-site room. Items to be transferred include: printer fax and copy paper office laptops boxes of pens and paper back up IT server discs If Business Continuity arrangements as advised by CEO require all staff to work from home, then it is responsibility of all staff to take their own PC and associated equipment / work.



Flood Recovery Plan

The recovery plan begins as soon as the venue is evacuated.

Whilst the venue is closed, the CEO Tennis Queensland will source a suitably sized room at a local location for use by the CEO and key managers / staff. The details of the venue's Business Continuity arrangements are in the Business Continuity Plan.

The venue will liaise with Stadiums Queensland for all property management issues.

Media management

If major structural damage is sustained which will impact on the immediate operations of the venue, a statement is to be issued once an assessment is completed. The statement will be managed by Stadiums Queensland Media Officer in consultation with Tennis Queensland.

Statements will only be issued once information is known about the full extent of damage to the venue and its impact on the venue's ongoing operations, including any announcement of when the venue will reopen.

Risk Awareness

Flood waters can cause a significant amount of damage. Venue personnel should not return to the premises until authorities (in conjunction with SQ) have advised that it is safe. Use extreme caution when entering buildings. Some common risks are listed below:

Electrocution – Stay clear of fallen power lines and electrical wires. Electric current passes easily through water. Wiring can be damaged by flood waters and presents a significant risk. Plant (eg. lifts), machinery, electrical appliances (servers, PCs) and

Action	Responsibility / Comment
Dehumidify damp areas	Selected staff / contractors
Check, repair and reinstate fire protection system: Test all sprinkler control valves for the open position and for physical damage. If valves are found closed, check for broken or disconnected piping before reopening Remove water and mud from valve pits Check all fire protection supervisory system circuits for integrity Test alarms systems	CEO Tennis Queensland in conjunction with GM Asset Management (SQ) and specific fire contractor/s
Debrief all key personnel and update / modify the flood emergency response plan, as required	CEO Tennis Queensland

Appendix A

Brisbane City Council Floodwise Property Report

Property Details

This FloodWise Property Report provides defined flood levels from river, creek, waterway and storm tide flooding and ground levels for the property nominated below. The information contained in this report is only based on information currently available to Council and such information may not be complete. APPLICANTS MUST NOTE THE DISCLAIMER ON PAGE 1 OF THIS REPORT. This report does not provide information relating to flooding from overland flow or local runoff.

Property

Street Address 190 KING ARTHUR TCE TENNYSON QLD 4105

Lot on Plan L.7/SP.214201

Flood Level

If you are purchasing, renting, renovating, building or extending a dwelling, the following information may be applicable. Please note that in the case of ground levels Council's records may show levels prior to the development of recent subdivisions. In this instance confirmation of ground levels may need to be sought from the developer or builder.

All figures used in the calculations below are approximate only. For accurate results a Registered Professional Engineer should be consulted.

Minimum Ground Level 3.1 m AHD

based on most recent Council Information*

Maximum Ground Level 13.7 m AHD

based on most recent Council information*

Highest Defined Flood Level (DFL) 7.9 m AHD (or 100 Year ARI Flood Level)

Highest flooding source from , RIVER

Flooding also occurs from Not available

Approximate depth of flooding on this property 4.8 m

Defined Flood Level (DFL) less the minimum ground level

Minimum habitable floor level 8.4 m AHD Highest defined flood level (DFL) in metres + 500 mm

^{*} Council receives ground level information from a number of sources including design plans, as-constructed drawings, ground surveys and airborne laser scanning. This report contains Council's most recent received ground levels. For accurate levels please see a registered surveyor.

Terms and Definitions (continued)

Maximum Ground Level The highest ground level on the applicant's property based on most recent ground level information. Check with a Registered Surveyor for further information on ground levels.

Minimum Ground Level The lowest ground level on the applicant's property based on most recent ground level information. Check with a Registered Surveyor for further information on ground levels.

Overland Flow

The Stormwater runoff which exceeds the capacity of the underground drainage system (if present) and which concentrates in surface depressions, yards and gullies as it flows down a catchment. Such flooding may result from a severe thunderstorm or periods of prolonged rain. This report does not identify overland flow flood levels and associated habitable floor levels.

Waterway Corridor

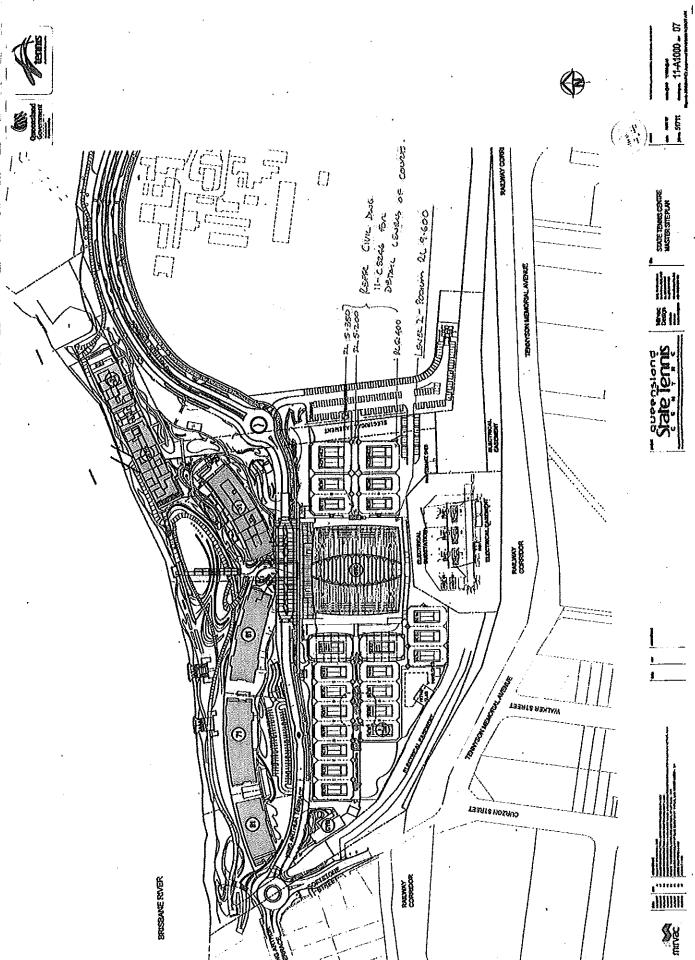
The corridors defined in *Brisbane City Plan 2000*, along waterways (being a river, creek or creek tributary) which protect water flow, water quality, biodiversity, and recreation values. The potential to build or extend a home situated within a waterway corridor is restricted. For further information on this contact the Development Assessment Customer Liaison Officer on phone (07) 3403 8888.

Storm Tide

The water level which results from the rise above the normal tide level due to the combined effects of wind and atmospheric pressure caused by severe weather conditions such as tropical cyclones or storms. Such rises may lead to flooding in coastal and bayside areas of the city.

Further Information About Flooding

Council's *Be FloodWise* program has a range of publications available that provide information on flooding in Brisbane, how to prepare your home and yard to reduce the impact of flooding and flooding considerations when buying or renting, or building or renovating. This information is available from Council's regional business centres or customer service centres, by phoning Council on (07) 3403 8888, or by visiting www.brisbane.qld.gov.au/floodwise.

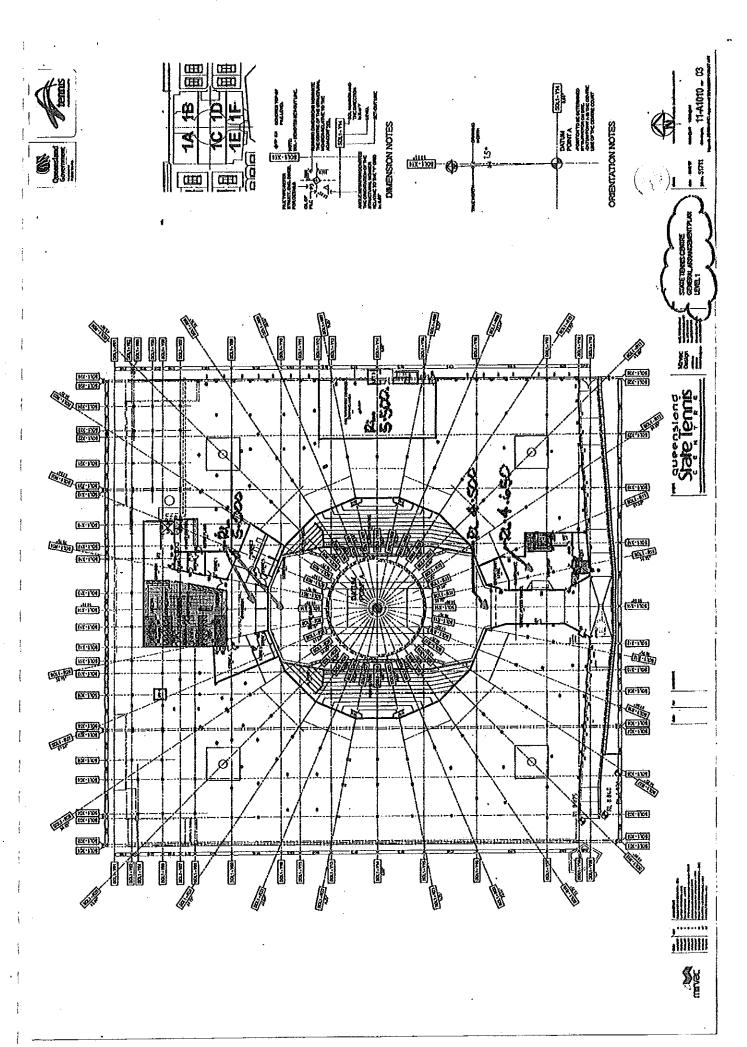


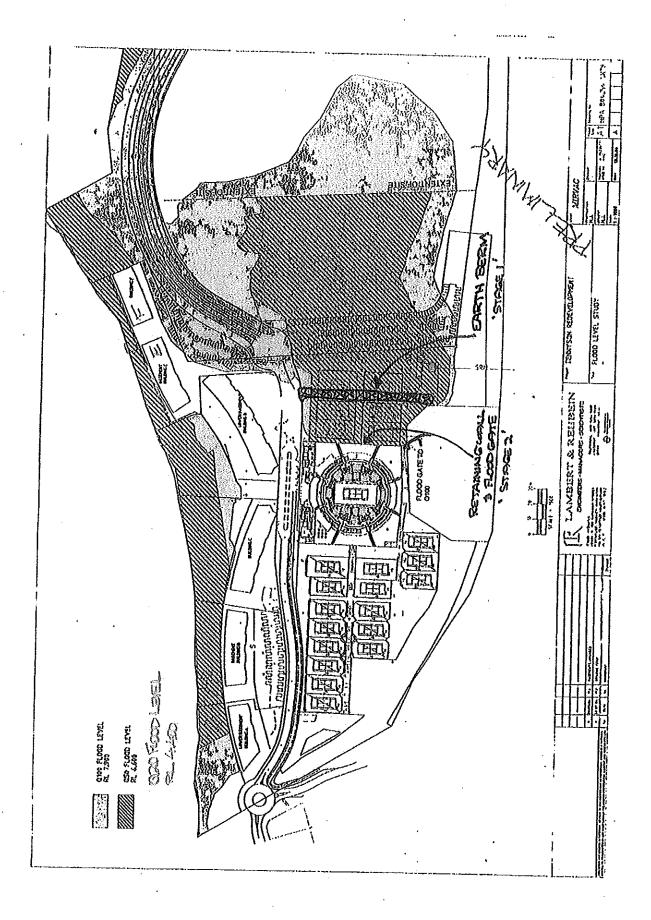
.....

-

1

_





.

.

Appendix D

Record of FERP Training

Marsh

Flood Emergency Response Plan

Appendix F

Flood Barrier Manual

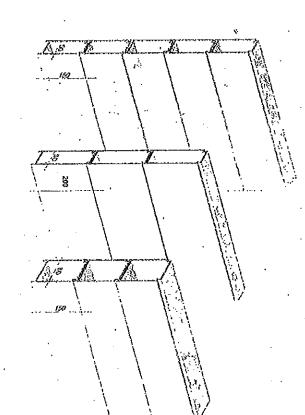
HDS-HIGHWATER DEFENCE SYSTEM

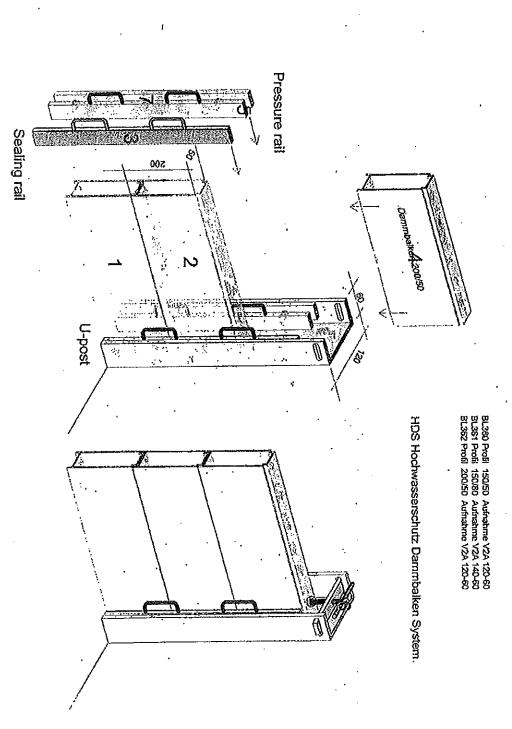
Dverview

3. HDS 200/50	2. HDS 150/80	1. HDS 150/50
BL362	BL361	BL360
Page 5	Page 4	Page 3

Details

Vertical details	4. Horizontal details
	•
Page 7	Page 6





© Blobel Umweittechnik GmbH - BLOBEL Environmental Engineering

Notes:

© Blobel Uniwelttechnik GmbH - BLOBEL Environmental Engineering



Planning, Installation and Service.

Our consultation, planning and design services guarantee your system will comply in all aspects with legal requirements.

Our engineering consultation services include:

- Site analysis and assessment
- Development of strategies for securing private and commercial assets
- · Quality assurance and monitoring

Delivery and installation by our professionals is an integral part of our service.

You will receive all of the necessary certification after each installation.

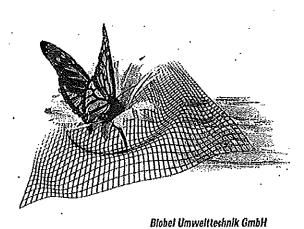
- Conformity with local building specifications,
- · Test certificates if required
- · Table of resistance for the seals .
- CE conformity declaration

Your service representative

Spare Parts

BLOBEL products are known for their highly robust nature. The stocking of spare parts for routine maintenance can therefore be limited primarily to wearing parts such as seals. Spare parts for all older designs are also available.

Our products are coordinated with one another, so special parts can also be integrated in existing product lines. Spare parts are conveniently available from the warehouse or with short notice delivery.



Friedberger Strasse 4
86453 Dasing, Germany
Phone: +49 (0)8205/96 07 0

Phone: +49 (0)8205/96 07-0
Fax: +49 (0)8205/96 07-20
E-mail: Info@blobel,de

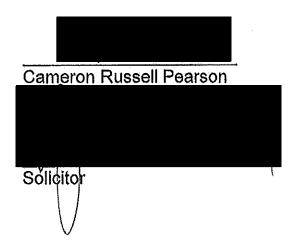
Blobel Environmental Engineering PO Box 61, Bondl Rd. Bondl NSW 2026 Sydney, Australia

Phone: +61 (0)2 9369 3504 Fex: +61 (0)2 9369 3504 E-mail: mail@blobel.de http://www.blobel.de

Room / Area	Contents / Notes	Responsible Party for relocating Contents of Room
Store Room 4 (off Main Gym Area)	Used as a Broadcast Room (nothing currently stored in room)	TQ
Store Room 5 (off Main Gym Area)	Used as a Scoreboard PC room (during event)	TQ
Store Room 6 (off Main Gym Area)	Gym storage room (eg. cardio equipment)	TQ
Level 1 - Centre Court		
Court Side	 2 x Electronic Scoreboards Umpire Chair Tennis nets and posts 	TQ
Level 1 - Maintenance V		
Main Maintenance Area	Significant equipment includes: 2 x mower tractors Hand mowers Strimmers	TQ
Workshop Kitchen	Fridge Units	TQ
Workshop Office	Significant equipment includes: PC and box Fax Server Unit	TQ
(Access to) Under croft	Storage of Flood Prevention Barriers	TQ
Chemical Storage Room (nb, bunded room draining into pit)	 Storage cabinets (fire proof) for chemicals, fuels Shelving unit for small quantities of chemicals/fertilizers 	TQ
Level 1 - Eastern Courts	s and surrounding areas (eg, car park)	
Tennis Courts	Tennis nets / posts, umpire chairs etc	TQ
Multi Purpose Room	Empty at time of visit	TBC
Access to Lift (nb, Access to Level 2 only)	De-energise / lock out in flood situation	TQ
Maintenance Shed	Significant equipment includes: 1 x Roller (on loan) Tennis court maintenance equipment (eg, grass cutters, clay fines equipment, etc)	TQ
Storage Container	Used by Brisbane International events team to store event signage	BI

Room / Area	<i>Contents </i> Notes	Responsible Party for relocating Contents of Room
Cleaning Cupboard	Used for storage of cleaning equipment, including high pressure hose	TQ

This is the annexure marked "C" referred to in the Statutory Declaration of Cameron Russell Pearson made the day of September 2011.



Flood Management Policy



This policy establishes a simple procedure to implement a Flood Management strategy for the Queensland Tennis Centre.

The QTC is located on the banks of the Brisbane River, with a significant proportion of the site and its improvements built below the Q100 flood level. The eastern side of the Pat Rafter Arena structure comprising of the car park, natural grass courts and the clay courts are expected to be inundated in a Q100 flood event. To prevent flood waters from these areas entering into the Level 1 areas of PRA, the building design includes provision for two temporary flood barriers to be quickly erected.

The metal channels / frames into which these barriers are to be placed are permanent fixtures and are located at the following locations:

- 1. Either side of the service driveway just beyond the south-east corner of the PRA structure.
- 2. In the service corridor on Level 1 of PRA between the Corporate Dining Area and the Storage areas (also in the south east corner of PRA).

The components of these flood barriers are stored in the service corridor on Level 1 of PRA, adjacent to the doorway into this corridor from the Maintenance Workshop. Copies of the Operational Manual for these flood barriers have been laminated and placed with these barriers for easy reference when they are required to be erected.

The Flood Management Response Team consists of:

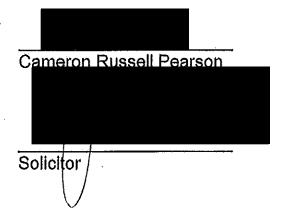
- TQ CEO
- TO Facilities Development Manager
- TO Finance and Administration Manager
- SQ QTC Senior Groundsman

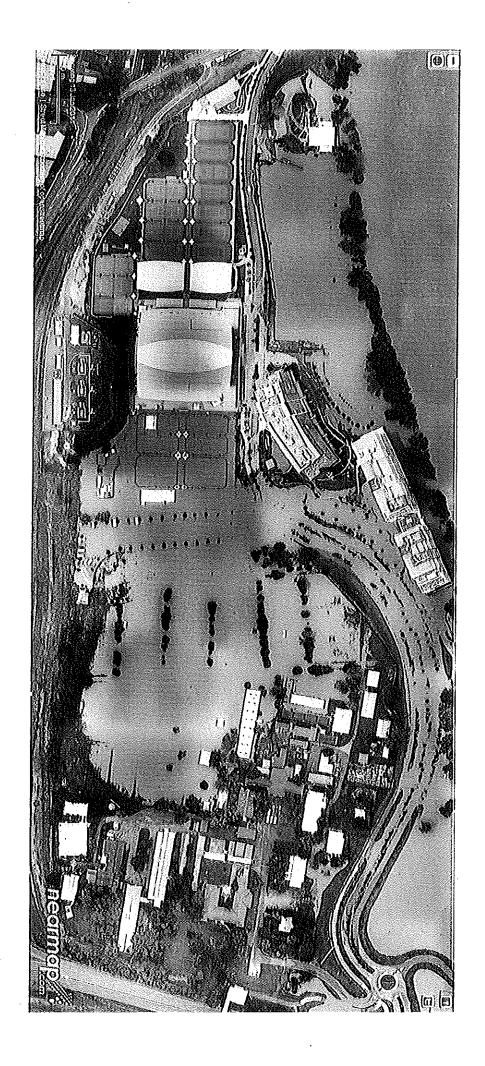
Any member of this Team can call for this Flood Management procedure to be enacted. A minimum of 2 members of this Team will be required to attend site in any potential flood situation to enact this procedure, which is as follows.

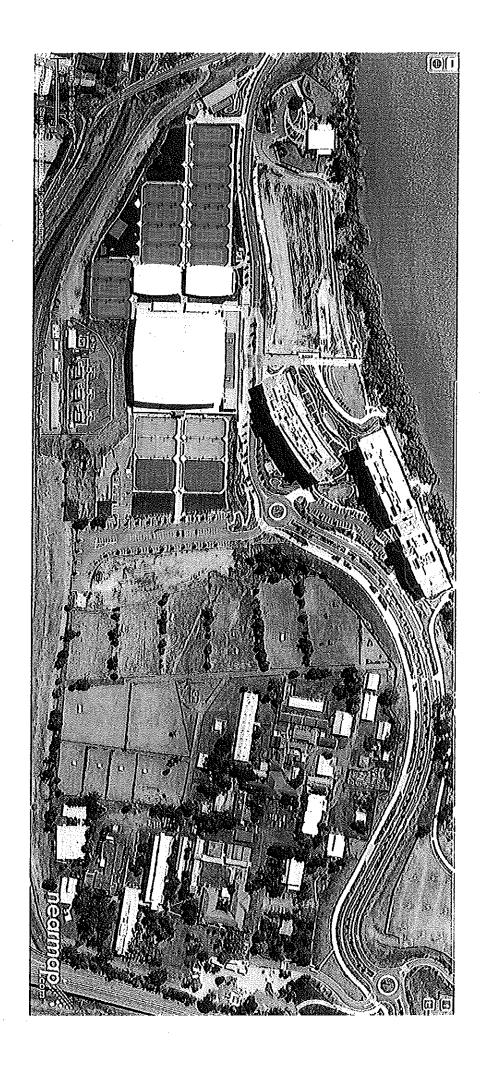
- 1. All members of the FMRT are to monitor the Bureau of Meteorology web site for any flood warnings and advices to determine if there is a possibility of a Brisbane River flood event that poses a threat to the QTC.
- 2. If any member of the FMRT believes there is a credible threat of flooding to the QTC site, they shall contact all other members of the FMRT to discuss this situation. If the majority of the FMRT are in agreement, any 2 members of the Team shall immediately commence installation of the 2 flood barriers.
- 3. A member of the FMRT shall contact Energex to alert them if the perceived flood threat to this site. It will be the responsibility of Energex to de-energise this site if required, as only their staff has access to the necessary areas of the two sub-stations for this to occur.

- 4. If time permits prior to the erection of the flood barriers, the FMRT shall remove any loose items of furniture and equipment from the areas to the east of these barriers and store them in areas that will not be affected by flood waters. Such items would include the nets, umpire's chairs and other equipment on Courts 18-23, and equipment and materials in the Maintenance Shed and surrounds, any loose furniture in the PRA Level 1 Multi-Purpose Room and the Corporate Dining Areas. A possible temporary storage area for these items could be the PRA Level 1 Store Rooms, the Maintenance Workshop or the Service Access Tunnel. The FMRT may seek the assistance of other TQ and SQ staff members to remove and temporarily store these items.
- 5. Again if time permits, sand bags should be sought from the SES to place along the bottoms of the glazed doors to the PRA Level 1 Multi-Purpose Room and the Corporate Dining Area to minimise flood water ingress into these rooms.
- 6. Before any recovery and clean-up work commences, contact should be made by a member of the FMRT with the relevant insurer to determine if they are required to inspect the site and the extent of damage and seek advice as to the extent of any such works (if any) that can be undertaken by staff or what works need to be undertaken only by appropriately qualified contractors (either engaged by the insurer or TQ).

This is the annexure marked "D" referred to in the Statutory Declaration of Cameron Russell Pearson made the day of September 2011.







This is the annexure marked "E" referred to in the Statutory Declaration of Cameron Russell Pearson made the 24 day of September 2011.

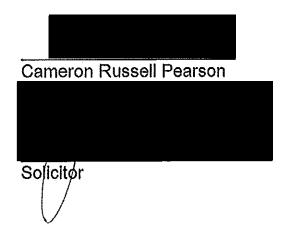
Cameron Russell Pearson

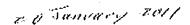
Solicitor

PROPERTY DAMAGE

1 Energex transformer (plus switchboard)	Fixtures
Fittings and services in the multi purpose rooms, temporary storage rooms, facility maintenance office and work shop, player locker rooms, gymnasium and cleaners store room.	
Floor coverings	Everything on the lower level
Save for concrete slabs	Concrete columns
Walls and blockwork walls.	Clay court surface
Grass court surface	Centre court surface
BI temporary infrastructure	Two containers of packed equipment
TVs and ELC	Large amounts of signage (centre court)
Two marquees	Tennis resources (temp storage)
Leftover merchandise (temp storage)	Grounds maintenance equipment (wiper snipper, drills etc)
Gymnasium equipment	Facility manager office and workshop equipment (le desktop computer, table, chairs, workbenches, historical venue records, shelving, fridge, microwave, chemicals)
Bottom bowl centre court seating (including spares)	Umpires chair.

This is the annexure marked "F" referred to in the Statutory Declaration of Cameron Russell Pearson made the 2d day of September 2011.







Mr Cameron Pearson Chief Executive Officer RÉCEIVED 25 JAN 2011 Tennis Queensland PO Box 2366 Gracoville, Queensland 4075

Dear Cameron

Notice relating to flooding - Office Lease

We refer to the lease dated on or about 9 December 2008 of the premises comprising the offices on the second fluor and the high performance coaching area located within the Queensland Tennis Centre, King Arthur Torrace, Tennyson (Premises) between the State of Queensland (represented by the Department of Local Government, Sport and Recreation) and Tennis Queensland (Lease).

We advise that parts of the Premises, including ossential services to the Premises, have suffered damage as a result of recent flooding affecting the greater Brisbane area.

Accordingly, Stadiums Queensland hereby gives you notice:

- pursuant to clause 16.1(a)(ii) of the Lease that Stediums Queonsland intends to repair such parts of the Premises as have suffered damage so that the Premises are accessible and/or so that you may occupy and use the Premises, and
- 2, pursuant to clause 11.7 of the Lease, that Stadiums Queensland requires to close the Promisos for the purposes of undertaking these repair works. The Premises will remain closed until further notice.

We are currently working to ropair damage to the Premises as soon as possible. We will keep you Informed as to progress of repair works and advise you as soon as practicable as to when the Premises (or part of them) will be available for occupation/use.

Yours falthfully

Geoff Baker

A/General Manager, Operations

For and on behalf of Stadiums Queensland

tevel it Gabbi Towars Att Value Succi Woolcongabea Queenstand Atox Australia





great venues -> good times











telaphone 461 7 3008 6100 Facsimile +61 7 3008 6161

20 Souvery 2011



Mr Cameron Pearson Chief Executive Officer Tennis Queensland PO Box 2366 Graceville, Queensland 4075

RECEIVED 2 5 JAN 2011

Dear Cameron

Notice relating to flooding - Queensland Tennis Centro Lease

We refer to the lease dated on or about 9 December 2008 of the premises described as the Queensland Tennis Centre, King Arthur Terrace, Tennyson but excluding the office premises (Premises) between the State of Queensland (represented by the Department of Local Government Sport and Recreation) and Tennis Queensland (Lease).

We advise that parts of the Premises, including essential services to the Premises, have suffered damage as a result of recent flooding affecting the greater Brisbane area.

Accordingly, Stadiums Queensland hereby gives you notice:

- pursuant to clause 18.1(a)(ii) of the Lease that Stadiums Queensland intends to repair such parts of the Premises as have suffered damage so that the Premises are necessible and/or so that you may occupy and use the Premises; and
- pursuant to clause 13.8 of the Lease, that Stadiums Queensland requires to close the Premises
 for the purposes of undertaking these repair works. The Premises will remain closed until
 further notice. We request that you inform all licensees, concessionaires or other occupants of
 the Premises of this closure.

We are currently working to repair damage to the Premises as soon as possible. We will keep you informed as to progress of repair works and advise you as soon as practicable as to when the Premises (or part of them) will be available for occupation/use.

Yours faithfully

Geoff Baker

A/General Manager, Operations

For and on behalf of Stadlums Ouccastand

great venues → good times

tevel ir Gabba Tewers gri Vu'tire Street Woolbongabha Queensfard gros Austrifa















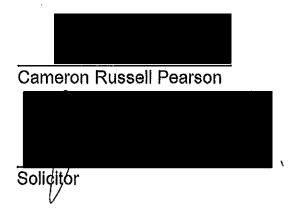




Telephone +51 7 3038 6103 fatsimile +61 7 3008 6161

ABH 33 600 B/3 3/4

This is the annexure marked "G" referred to in the Statutory Declaration of Cameron Russell Pearson made the 2d day of September 2011.





RECEIVED 3 4 FEB XIII

7 February 2011

Mr Cameron Pearson Chief Executive Officer Tennis Queensland PO Box 2366 Graceville QLD 4075

Dear Cameron

Notice relating to flooding - Office Lease

We refer to our notice/letter dated 20 January 2011.

We advise that Stadiums Queensland has completed repair works to a stage where the Premises (as referred to in our earlier notice) are accessible and you may occupy and use them.

Accordingly Stadiums Queensland confirms that the Premises cease to be closed effective immediately and that you may resume possession of the Premises immediately in accordance with and subject to the terms of the Lease.

Repair works are ongoing in relation to the main air-conditioning system which services the Premises. In this regard, Stadiums Queensland has effected works to cause a temporary air-conditioning supply to be available pending completion of repair works to the main air-conditioning system.

If, following re-occupation, you experience any issues with the Premises please contact us immediately.

Yours faithfully

Geoff Baker

A/General Manager, Operations

For and on behalf of Stadiums Queensland

great venues -> good times



















Level 11 Gabba Towers 411 Vulture Street Woolloongabba Queensland 4102 Australia

Telephone +61 7 3008 6100 Facsimile +61 7 3008 6161

ABN 53 690 873 374



7 February 2011

Mr Cameron Pearson Chief Executive Officer Tennis Queensland PO Box 2366 Graceville, Queensland 4075

RECEIVED 1 4 FEB 2011

Dear Cameron

Notice relating to flooding - Queensland Tennis Centre Lense

We refer to our notice/letter dated 20 January 2011 (notice).

Our notice confirmed that Stadiums Queensland intends to effect repair so that the Premises are accessible and/or so that you can occupy and use the Premises. The notice advised of a closure of the Premises.

We have been working diligently to effect repair.

The status of repair works is such that Stadiums Queensland can now advise:

- the Premises (as referred to in our earlier notice) cease to be wholly closed effective immediately;
- repair works are not completed on those parts of the Premises referred to in the Schedule below (Part Premises);
- (c) pursuant to clause 13.8 of the Lease, Stadiums Queensland requires that the Part Premises are (and remain) closed until further notice in order to effect uncompleted repair works. We request you inform all licensees, concessionaires or other occupants affected by that part closure;
- (d) the balance of the Premises (other than the Part Premises) are accessible and you may occupy and use them and resume possession of them effective immediately (with such occupation and use to be in accordance with and subject to the terms of the Lease).

We will continue with repair works in relation to the Part Premises with a view to you being able to occupy and use them once the repair works are complete. We will keep you informed as to the progress of repair works in relation to the Part Premises and advise you when the Part Premises (or parts thereof) are available for your occupation and use.

Repair works are ongoing in relation to the main air-conditioning system which services the Premises. In this regard, Stadiums Queensland has effected works to cause a temporary air-conditioning supply to be available pending completion of repair works to the main air-conditioning system.

If, following re-occupation, you experience any issues with the balance of the Premises, please contact us immediately.

great venues → good times

Level 11 Gabba Towers 411 Vulture Street Woolloongabba Queensland 4102 Australia

Yelephone +61 7 3008 6100 Facsimile +61 7 3008 6161























Schedule

- 1. All internal areas of the Pat Rafter Arena, including levels 1, 2 and 3.
- Those parts of the public concourse, referred to as the level 2 podlum, as delineated by temporary fencing.
- 3. Those parts of the public and staff car parks as delineated by temporary fencing.
- All internal and external areas of the facility situated on level 1, including grass and clay tennis
 courts and landscaped surrounds.

Yours faithfully

OWII DUKU

A/General Manager, Operations

For and on behalf of Stadiums Queensland

great venues → good times

















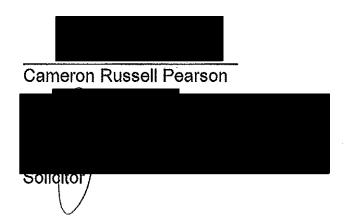


Level 11 Gabba Towers 411 Vulture Street Woolloongabba Queensland 4102 Australia

Telephone +61 7 3008 6100 Facsimile +61 7 3008 6161

ABN 53 690 873 374

This is the annexure marked "H" referred to in the Statutory Declaration of Cameron Russell Pearson made the day of September 2011.



·STC areas that have remained closed:-

- All internal areas of Pat Rafter Arena, including levels 1,2 & 3
- All temporary fenced-off podium areas
- All temporary fenced-off car park areas
- All internal areas of Level 1
- Clay and grass courts.