

Mr William Hodgkinson

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Our Ref: BRD-L-Qantas-0001

Thursday, July 4, 2019

Dear Mr Hodgkinson

Comment on Qantas Flight Training Centre Proposal (SSD 10154)

I refer to the letter dated 3 June 2019 from Joanna Bakopanos inviting the Australian Rail Track Corporation (ARTC) to provide comment on the Qantas Flight Training Centre (the Proposal), including advice on recommended conditions of consent. ARTC's Third Party Interface team and Sydney Project's team have reviewed the proposal. ARTC would like to express its support for the proposal subject to resolution of the following key issues.

Risks to ARTC Assets

1	Appendix DD- Preliminary Construction Management Plan Sections 4.14.1 and 4.2	Section 4.14.1 references a construction compound with access off King Street. Section 4.2 references hoarding along north side of King St sidewalk. Access to the ARTC rail corridor via King Street should not be impeded at any time.
2	EIS Section 7.2.6	Spread of weed species and garden escapees from nearby areas can cause additional maintenance requirements for the operational rail corridor. As such it is recommended that native species are used in all landscaping as part of this project. In addition, no trees with the potential to drop leaves, flowers or branches into the rail corridor should be planted adjacent the boundary.

Risks to ARTC Operations and Rail Safety obligations

3	Appendix DD- Preliminary Construction Management Plan Section 4.5	The use of a tower crane adjacent to an operating rail corridor introduces risks to rail safety. ARTC requests that in accordance with its obligations under the Rail Safety National Law 2011, it is given the opportunity to review and approve construction plans and safe work method statements where such risks exist.
4	Appendix Z- Civil Engineering Plans and Section 6.1.1. of the EIS	Easement along west side of project boundary includes provision for vehicular access from the proposed site to another Qantas site, running along ARTC land of which Qantas formerly held a license. This license with ARTC is due for renewal. There is no reference to

	General Comment	<p>this easement on any drawings or plans. In addition, without renewal of that licence, it could inhibit the project as proposed.</p> <p>Note that there is a contradiction in Section 6.1.1 of the EIS that states that ARTC is not considering acquiring land associated with the project. While no proposal for acquisition is anticipated at this point in time, the license has not been renewed.</p> <p>As discussed with Qantas, ARTC requires shared use of that access way and would seek to resolve requirements through ongoing discussion around the relevant license.</p>
5	Appendix X - Noise and Vibrations Emissions Assessment Section 11.4.1	<p>Section 11.4.1 of the Noise and Vibration Assessment notes that there is some equipment typically used during construction projects that could impact the proposed facilities. ARTC notes that this and other equipment is often used as part of standard maintenance and operations within the full extent of its corridor boundary (which could be within 20 metres of the proposed facility). ARTC does not support limitation to its standard operations and maintenance in proximity of the proposal.</p>
6	Appendix AA - Infrastructure Report Page 4 – Car Park	<p>ARTC does not support the proposed above ground water mains adjacent to the rail corridor as in the event of an incident, the risk to rail safety (including personal and environmental safety) is too significant. Examples of risks include water movement to the rail corridor causing scour and destabilising the formation.</p>
7	Appendix Y - Stormwater Management and Civil Design Report Section 5.1.2.1 Table 3 Appendix Y - Stormwater Management and Civil Design Report. Mitigation Measures and Environmental Risk Assessment	<p>Stormwater modelling for existing open canal on the project site. Location B is adjacent to ARTC track. Modelling shows increase of levels to 4.07m for the Revised Model- PMF level floods.</p> <p>ARTC requests that confirmation that the open drainage culvert has been modelled with appropriate blockages where this system enters closed systems to ensure compliance with Botany Bay LEP 2013, 6.3 (3) (c) in the post-development scenario.</p> <p>The impact of flooding onto ARTC corridor has not been shown. ARTC recommends a condition of consent is considered that prescribes there to be no impact.</p>
8	EIS Section 4	<p>ARTC has not been provided with sufficient detail to provide advice as if it were to provide concurrence on the design given the significant risks associated generally with piling and excavations adjacent to an operational rail line which would be useful to the consent authority despite clause 86(5) of the SEPP (Infrastructure). Given that Clause 86(5) excludes the need for ARTC concurrence,</p> <p>ARTC notes that there are inherent risks associated with earthworks around a rail corridor which could affect the integrity of the infrastructure and as such requests confirmation that potential risks</p>

		to safety of ARTC infrastructure, operations and people are not introduced as a result of this proposal.
11	Appendix Y - Stormwater Management and Civil Design Report Section 5 - Civil Engineering	<p>Fig 6 shows existing condition (pre-development) modelling only. The proponent should provide the post-development TUFLOW maps shown for 1% AEP to allow ARTC & Council to assess the impacts on the Botany Line for DPE to adequately understand the potential impacts onto ARTC rail corridor.</p> <p>ARTC does not support any impact as a result of increased stormwater overflow onto its rail corridor as it could significantly impact operations to and from Port Botany.</p>
12	Stormwater Drainage Design Appendix A	The stormwater design within the development appears not to contain any on-site stormwater detention / attenuation devices to manage peak flows in to receiving systems. ARTC raise concerns with the increase in 1%AEP and PMF levels at Point B, Section 5 (Fig 6) & Table 3 of the same section.

Risks to the Community and consideration of ARTC's upcoming Botany Rail Duplication Project

13	General	Cumulative impacts associated with the range of projects proposed within proximity should be considered. ARTC encourages proactive communication with the local community around potential noise and traffic impacts to ensure clear delineation between projects.
14	Appendix DD- Preliminary Construction Management Plan Section 6.4.12	<p>The EIS does not outline how Qantas proposes to continue to engage with ARTC as adjacent landowners.</p> <p>ARTC requests that they are consulted in relation to key issues that may affect rail operations including maintenance such as access, risks associated with construction including cranes, drainage and stormwater.</p>

If you have any queries or would like to discuss these comments further, please feel free to contact me on the details above.

Yours sincerely



Stephanie Mifsud - Environment Manager