



Bayside Council

Serving Our Community

11th July 2019

Our Ref: F18/ 679

Contact: Howard Taylor 9562 1663

William Hodgkinson
Industry Assessments
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Hodgkinson

Re: Bayside Council Submission on SSD-0154 – Qantas Flight Training Centre

Thank you for the opportunity to make a submission in response to exhibition of the State Significant Development for the new Qantas Flight Training Centre. At its meeting of 10th July 2019, Council resolved to endorse the attached submission for the NSW Department of Planning and Environment's (DPE) consideration. Council's resolution is reproduced below:

- 1. That Council note that the proposed flight training centre is critical to Qantas' operations to maintain the legislated level of training for its pilots and cabin crew.*
- 2. That Council endorses the attached submission in relation to the State Significant Development of the Qantas flight training centre for consideration by the NSW Department of Planning and Environment.*
- 3. That the Member for Heffron, Mr Ron Hoenig is advised of Council's submission.*

We trust that DPE will carefully consider Council's submission when assessing and determining the proposed development.

Yours sincerely

Clare Harley
Manager Strategic Planning

Attached:

1. Council Officers Report
2. Council's submission

Eastgardens Customer Service Centre

Westfield Eastgardens
152 Bunnerong Road
Eastgardens NSW 2036, Australia
ABN 80 690 785 443 Branch 004

Rockdale Customer Service Centre

444-446 Princes Highway
Rockdale NSW 2216, Australia
ABN 80 690 785 443 Branch 003
DX 25308 Rockdale

Phone 1300 581 299

T (02) 9562 1666 F 9562 1777

E council@bayside.nsw.gov.au

W www.bayside.nsw.gov.au

Postal address: PO Box 21, Rockdale NSW 2216



Telephone Interpreter Services - 131 450

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**DRAFT BAYSIDE COUNCIL SUBMISSION
STATE SIGNIFICANT DEVELOPMENT
QANTAS FLIGHT TRAINING CENTRE (SSD-10154)**

Introduction

This draft submission provides feedback on the detail of the proposed development and management of key issues including traffic and transport planning, building setbacks, extended construction hours, landscaping, management of stormwater and section 7.11 contributions.

On the 4th June 2019, the DPE notified Council of the exhibition of a State Significant Development Application for the construction of a new flight training centre for Qantas Airways, located at 297 King Street, Mascot.

Council understands that the proposed development is declared State Significant Development as the proposed development is 'specified development' (Air transport facilities) under the 'call-in' powers in section 4.36 (3) of the *Environmental Planning and Assessment Act 1979*. The development is proposed to include:

- Demolition of existing structures.
- Removal of eighty-five (85) trees.
- Site remediation.
- Construction of a new flight training centre which includes, in summary:
 - 14 flight simulators
 - aircraft cabin mock-ups
 - evacuation pools
 - multi-media learning centres
- Construction of a 13 level multi-storey car park for 2,059 cars.

The exhibition period is from Tuesday 4th June 2019 to Thursday 4th July 2019. Full documentation of the project can be found at:

<https://www.planningportal.nsw.gov.au/major-projects/project/9961>

Background

Ministerial Call-in Request

On the 4th December 2018, the NSW Department of Planning and Environment wrote to Council requesting consideration of a call-in request from Qantas pursuant to Section 4.36 of the EPAA for the construction and operation of a new flight training centre.

In a letter dated 18th December, Council officers wrote to the NSW Department of Planning and Environment in support of the utilisation of the 'call-in' power under Section 4.36 (3) of the EPAA due to the critical nature of the project.

On the 1st February 2019, representatives from Urbis (acting on behalf of Qantas) and Qantas met with Council officers to undertake consultation prior to formal issuance of the Secretary's Environmental Assessment Requirements. At the meeting, preliminary Architectural plans and were presented for consideration and feedback.

Council staff conducted a review of the preliminary Architectural plans and on the 11th February 2019 provided feedback in relation to the following primary issues:

- the proposed 4.5 metre setback to King Street being less than the 9 metres required by the Botany Bay DCP 2013.
- traffic impacts on the intersection of O'Riordan Street and King Street as well as within the site
- 24 hour construction operations
- whether section 7.11 contributions were applicable

The issues summarised above are included in detail in a letter from Council staff to Urbis dated 11th February 2019.

On the 28th February, the Minister for Planning declare the project State Significant Development through a notice in the New South Wales Government Gazette (No 20) pursuant to Section 4.36(3) of the EPAA.

Draft Secretary's Environmental Assessment Requirements (SEARs)

On the 11th March 2019, the DPE requested that Council staff review the following information to identify any key issues to be included in the draft SEARs:

- Qantas Flight Training Centre Gross Floor Area plans
- Qantas Flight Training Centre Site Plan
- Qantas Flight Training Centre Elevations
- Qantas Flight Training Centre Floor Plans
- Qantas Flight Training Centre Visualisation from Gateway
- Qantas Flight Training Centre Scoping Report for SEARs

Council staff wrote to the DPE on 21st March 2019, reiterating the issues previously raised in Council's letter dated 11th February 2019.

Public Exhibition

Council staff have undertaken a review of the exhibited documents and provide the following comments for the Department of Planning and Environment's consideration:

Development Engineering

Stormwater management:

- The development requires, and must provide, an On-Site Detention System (OSD) designed according to Part 6 of the Botany Bay DCP Part 10 — Stormwater Management Technical Guidelines. OSD systems for the development must be designed to detain the stormwater runoff from the site for all storm events up to and including the 1 in 100 year ARI storm and permissible site discharge (PSD) must be based on 1 in 5 year ARI peak flow generated from the site under the State of Nature condition (i.e. the site is totally grassed/ turfed), rather than pre-development condition. The current proposal does not provide this required stormwater infrastructure is not supported. OSD is required for the development regardless of the existing condition of the site prior to the submission of the development proposal.
- A WSUD Strategy and MUSIC model must be prepared for the stormwater design of the development. The MUSIC model must be prepared in line with the NSW MUSIC Modelling Guidelines (Sydney Metro CMA) and must indicate that water quality improvement meets or exceeds the target as described in the "Botany Bay & Catchment Water Quality Improvement Plan" which was prepared by the Sydney Metropolitan Catchment Management Authority in April 2011. The water quality improvement system and WSUD strategy proposal shall be designed to capture and treat at least 85% of flows generated from the site. The development shall indicate that it complies with this requirement.
- A Stormwater Quality Improvement Device (SQID) must be provided prior to the discharge of stormwater from the site. Botany Bay DCP Part 10 — Stormwater Management Technical Guidelines section 16 and Botany Bay DCP part 3G further details this requirement.
- Backflow prevention devices shall be provided for all new & existing stormwater connections into the existing Sydney Water owned stormwater channel that traverses the site.
- A minimum 10000 litres capacity of rainwater tank(s) shall be provided for the development as roof areas exceed 5000m². The rainwater is to be re-used for non-potable uses throughout the development which includes all toilets and landscape irrigation. This is detailed in Botany Bay DCP Part 10 — Stormwater Management Technical Guidelines section 4.
- Devices capable of removing oil shall be provided for all car parking facilities proposed for the development. The device(s) shall be manufactured by a Quality Endorsed Company to the requirements of ISO 9001 and shall have a minimum oil storage capacity of 20 litres per 10 car spaces proposed or part thereof.
- Positive covenants should be placed over the OSD and SQID systems in favour of Bayside Council as per Botany Bay DCP Part 10 — Stormwater Management Technical Guidelines after construction.

Flooding:

- The development is not to increase the flood water level or hazard. The development shall comply with the minimum floor levels (with freeboard) required for habitable and non-habitable areas.

Traffic, Parking & Access:

- The Traffic and Parking Impact Assessment Report is to undertake a cumulative traffic impact assessment for 'all developments' in the area. By 'all developments' it means those still have DA approval pending, approved but yet to be constructed, those are under construction and fully built but not yet fully occupied, in accordance with Botany Bay DCP part 3A3.3.
- Secure bicycle parking (at a rate of at least 10% of the required parking for the development) and end of trip facilities must be provided for the development to support alternative modes of transport to and from the site.
- Workplace Travel Plans and Transport Access Guides (TAGs) shall be prepared for the development in order to reduce the on-site parking demand and car dependency. Workplace Travel Plans and Transport Access Guides assist staff/visitors/customers visiting the site by making good use of public transport, cycling, walking and car sharing for commuting work related journeys and hence reduce car based travel demand. The Workplace Travel Plan shall be accordance with NSW Premier's Council for Active Living's "Workplace Travel Plan Guidelines - Final Report (April 2010)". The plan shall generally incorporate the following:
 - Encouragement of staff to cycle and/or walk to the workplace;
 - Encouragement of staff to use public transport to travel to workplace by providing financial incentive;
 - Adoption of a car sharing and /or car pool scheme; and
 - Establishment of measurable targets on the number of staff travelling to work by public transport, cycling and walking.

Strategic Flood

- A detailed peer review of the Enstruct flood model of the site (a TUFLOW model), which is an updated and modified version of Councils MRE flood model. This was discussed at the meeting with the applicant.
- Based on the peer review of the Enstruct flood model, final flood levels shall be adopted for the development. Council set these final flood levels based on the information provided by the applicant and the peer review for this model, as these potentially provide updated information to what Council currently holds (MRE model).
- The Stormwater plan indicates filling will be required for the northern part of the channel for the open car park. Filling in the car park is not permitted as the depression area acts a flood storage, unless alternative flood mitigation is adequately demonstrated.

Environmental Science

Council officers raised no objection to the proposal subject to the following recommendations:

- Additional information should be provided in the Acid Sulfate Soil Management Plan for managing temporary/ localised dewatering activities during construction.

- To ensure the necessary assessment and management is completed and implemented, a condition should be included in the determination to require a NSW Environment Authority (EPA) Accredited Site Auditor to be appointed prior to commencement of any construction works at the site. The Site Auditor shall review and endorse any investigations and management plans proposed prior to the commencement of any works. A Site Audit Statement should be submitted to Council for this site prior to the issue of the Occupation Certificate. Any long-term Environmental Management Plan (LTEMP) to manage contamination must be added to the title of the site.

Landscape Architect

- The landscaped area required is 10% of the site. Landscape setbacks can be included in the calculation except for the front setback area as defined in the Botany Bay DCP 2013 Part 6.3.5 Setbacks, control 9. Therefore the proposal shall provide 5,417m² without including the 3 metre landscape setback along King Street. The landscape area provided in the proposal reaches approx. 3,458m², representing 6.3% of the site.
- The project would remove about 0.30 hectares of vegetation, comprising 0.07 hectares of PCT 1232 Swamp Oak floodplain swamp forest, Sydney Basin Bioregion and South East Corner Bioregion, and 0.23 hectares of miscellaneous ecosystem – urban exotic/ native landscape plantings.
- Considering the removal of existing vegetation including an area of an endangered ecological community (Swamp Oak floodplain swamp forest), and the minimal deep soil area provided the landscape proposal shall use locally indigenous plant species, and trees shall be planted in advanced form, between 200 to 400 litres container sizes.
- The proposal shall seek to comply with minimum deep soil required. If this is not viable to compensate the reduced landscape area, some alternative treatments can be considered for inclusion in the proposal:

Green roofs:

Extensive (150mm deep) or intensive (more than 150mm deep) green roofs. The proposed carpark building can include this treatment which also will minimise the visual impact of the large built form. The green treatment can provide an attractive presentation of the enterprise seen from the air and neighbouring buildings from adjacent business areas. The green roof includes a vegetated layer, growing medium, and a waterproof membrane. Plants grown in sectioned lots are acceptable, however, potted plants/ planter boxes which cover less than 30% of available rooftop space are not considered as a green roof. Additional to the minimum 30% vegetation cover, a green roof can include facilities for renewable energy, water collection infrastructure, walkways, furnishings and the like.

Green Roof Gardens:

The inclusion of a 'green roof garden' that can be accessed and used for recreation and outdoor living and includes a greater variety of plants, trees and shrubs should be considered.

Green Walls:

Green walls are either free-standing or part of a building that is partially or completely covered with vegetation. The wall may incorporate soil and/ or inorganic material as the growing medium. There are two main types of green wall: green façades and living walls. Green façades are made up of climbing plants either growing directly on a wall or on specially designed supporting structures. The plant's shoot system grows up the side of the building while being rooted in the ground. With a living wall, modular panels are affixed to the wall and geo-textiles, irrigation and a growing medium combine to support a dense network of plants.

Bio-swales:

Within planter beds to filter water before entering the water way.

Permeable or porous pavers:

Where traffic movement is not high, for example in parking spaces, permeable pavers or interlocking system unit pavers can be included to reduce runoff and maximised the water filtration across paved areas.

At-grade parking:

- The proposed at grade carpark provides some opportunity for canopy cover to the hard surface areas. To comply with Part 3L.6 Landscaping in Car parks, Control 1 of Botany Bay DCP 2013, one (1) tree should be provided for every 5 car spaces so that at least a 50% canopy coverage of the car park at maturity is provided. Car parks will be generously landscaped.

Public Domain Landscape Improvements.

- King Street nature strip shall be planted with street trees as required, pot size shall be minimum 200 litres. Trees shall be planted in a tree pit with a slotted pipe watering system (Rootrain Urban, or equivalent). Bicycle racks and seating shall be included in proposal as necessary. All landscape works within public domain shall be as per Bayside Council specifications.

Section 7.11 Contributions

Council notes Qantas' request to waive Section 7.11 contributions as noted in the letter at Appendix YY of the Environmental Assessment. There is no provision in the Act or the contributions plan for a refund of contributions when a development reduces the number of workers on the site. Council does not normally allow the transfer of existing occupancy as the previous site will continue to have existing use rights (even if they are not used immediately).

Therefore, the full extent of this growth within the LGA should be considered.

The 2018 air photo of the site shows that the existing use of the site is as an at-grade, open-air car park, with an industrial building of about 700 square meters. The Environmental Impact Statement that this building is used to store spare parts.

The Contribution plan assumes that the occupancy for Transport/ Storage/ Warehousing is 81.4 sqm per person.

$$700 / 81.4 = 8.600 \text{ existing workers}$$

The Environmental Impact Statement advises that the site will be occupied by 155 employees.

This means a net increase in occupancy of $155 - 8.600 = 146.40$ workers.

At the 2019/ 2020 rate of \$4,648.99 per worker the contribution would be **\$680,612.14**.

Note: The amount to be paid is to be adjusted at the time of payment, in accordance with the review process contained Contributions Plan.

Transport Planning

Operations traffic and parking and traffic assessment:

- This facility and its surrounds are in a significant employment hub, whereby high-quality pedestrian access to the site is required on-site. As such, upgrading of the current footpaths within the Qantas Corporate Park and to/ from the new Flight Training Centre to 2.0m wide on the main pedestrian access routes towards key destinations such as Mascot Station and Domestic Terminal (T2, T3) is required. Consideration should also be given to improving pedestrian access along King Street.
- The Flight Training Centre should be providing appropriate end-of-trip facilities (parking, lockers and showers) to accommodate workers and visitors accessing the site by bicycle without relying on adjacent buildings facilities. Refer to earlier comments about the requirement for a Workplace Travel Plan and Transport Access Guide (TAG).
- The statement at 2.35 of the Environmental Impact Assessment that cyclists can access Kent Road and Qantas Drive is not valid/ misleading as there are no bicycle facilities provided on these busy, hazardous roads. Consideration to improving the on-road bicycle markings in the Qantas Corporate precinct to accommodate bicycle users and their safe movement within it.

Other comments:

- Access to public transport is good – consideration should be given to enhance wayfinding to key destinations within the Qantas Corporate Park.
- The proximity to the Port Botany freight rail line to this flight training centre (and the use of flight simulators) are in close proximity to the vibrations and zone of influence imparted from that rail line. Consideration is to be given to the proximity of the project to the Australian Rail Track Corporation's project to duplicate the Port Botany freight rail line.

Environmental Health

During construction:

As the proposed working hours are from 6am, a more sensitive noise criteria applies. Council requests that a condition be included in the determination requiring an acoustic report prepared by a suitably qualified and experienced acoustic consultant to assess that any of the noise output would not affect surrounding properties. The acoustic report should define 'non-noisy' activities and include an assessment of these activities in the report.

Council understands that many of the proposed operations works are to be conducted outside of normal business hours. It is therefore recommended that all neighbouring properties are made aware of such works in advance and that activities are carried out in isolation rather than all at once so as to manage the noise impacts.

During operation:

Noise from the operation of the flight training centre is not to exceed the requirements contained in part 6.3.12 – Noise and hours of Operation of the Botany Bay DCP 2013.

Traffic impacts

A cumulative traffic impact assessment for 'all developments' in the area should be undertaken for the proposal in accordance with Botany Bay DCP 2013 Part 3A3.3.

By 'all developments' it means those that still have DA approval pending, approved but yet to be constructed, those are under construction and fully built but not yet fully occupied. Council will supply information on the current and approved DAs to be taken into consideration.

The analysis should be used to determine the amount of monetary contribution toward any road maintenance within King Street and intersection upgrade works at King and O'Riordan Streets, and is to be included as a condition on the determination.

Urban Design

Reference is made to section 7.2 – Urban Design and Visual of the submitted Environmental Assessment, and the Botany Bay Development Control Plan 2013 (Botany Bay DCP 2013):

7.2.1 Design and Built Form

Botany Bay DCP 2013

6.2.3 Mascot (West) Industrial Precinct

C1: Development shall encourage a higher public transport (including walking and cycling) use and include strategies to encourage and promote car sharing and car pooling strategies. In this respect a Workplace Travel Plan is to be lodged with the development application. The Workplace Travel Plan shall establish measurable targets to achieve the mode share targets stated in the Mascot Town Centre Precinct TMAP - maximum car mode share: 65% by 2021 and 57% by 2031.

Comment: Appendix D - Architecture and Design outlines the internal movement strategy however there is no identification of how improvements to King Street will be made to encourage employees etc. to use public transport or cycle to work. With the 4.5 metre landscape and built form setback there is little opportunity to provide widened footpaths that may connect to broader active transport network or public transport. The transport diagram lacks detailed information on where public transport is providing services to and from as well as any cycle ways within the vicinity. The proposal needs to consider how access and movement to and from the site can be enhanced, not just within the site.

6.3.5 Setbacks

Setbacks are to be in accordance with the following Table 1. Note: Greater setbacks will be required for bulky, hazardous and noise or odour generating activities.

Boundary	Landscaping Setback	Building Setback	Compliant
Front - to a non-classified road (Refer to Note 2)	3 metres	9 metres (Refer to Note 5) (Refer to Note 6 for corner sites)	Non-compliant has a 4.5 landscaping and building setback
Side - adjoining a non-residential use/zone including lanes	2 metres	2 metres (Refer to Note 6 for corner sites)	Achieved
Rear (Refer to Note 3)	Nil to 3 metres	Nil to 3 metres	Achieved

Comment: Understanding that the facility requires a certain level of floor space in which the site can operate it is noted that the development will set a precedent for any future adjoining redevelopment and will alter the streetscape.

It appears that there is still some height to work with on the Eastern portion of the carpark building, by removing some of the at grade car parking greater landscaping within the site may be achieved.

Note: Control C2 provides the following in relation to setbacks to the Alexandria Canal and its tributaries:

C2: Notwithstanding C1 above, no buildings, structures, car parking, storage or vehicle manoeuvring areas are permitted within a minimum 10 metre wide area adjoining Alexandria Canal and 6 metres along the tributaries of the Canal. The setback is to be landscaped and planted with appropriate species, as detailed in the Alexandria Canal Masterplan, such landscaping not to include plants with invasive root systems and that have the potential to damage the canal wall or its surrounding infrastructure.

An appropriate condition should be considered for inclusion in the determination to address this requirement of the Botany Bay DCP 2013.

7.2.2. Materials and Facades

It is understood that the project will be referred to the State Design Review Panel for review.

The approach to facade design is commended. The development meets the objectives of the DCP to achieve a high quality of design and finish. The 'QGET EP Hall' and 'QGFT Flight Simulator' buildings are of high quality, however it is encouraged that further development of the design of the carpark to enhance the consolidation of the precinct aesthetic be explored. It is recommended that some of the finishes from the QGET EP Hall or the QGFT Flight Simulator building are transferred to the carpark building to tie in with the aesthetic of the rest of the precinct, or that further consideration to how the green wall could be better incorporated onto the facade of the building may also tie in better with the landscape approach.

7.2.3. Options Analysis

Options analysis as stated above needs to be of a broader scope than just the design of the car park building. Without understanding the options tested there is no justification as to why the development is non-compliant in regard to the setback requirements. By testing options that alter the arrangement of car parking or access, it may be possible that a greater setback can be achieved and further public benefit be provided through widened footpaths that may allow for connection to the broader active transport network. There seems to be little consideration given to the broader public domain approach along King Street, enhancing movement to and from the site should also be of consideration.

7.2.5. Public Domain

Botany Bay DCP 2013

6.3.9 Landscape

C10 If an existing site is to be re-furbished, or with change of use applications, and if the landscaping forms less than 10% of the site area, then 10% will be sought if there is unused land available or excess parking. If there is less than a 3 metre wide landscaped frontage width this will also be sought.

Comment: Please refer to comments in 7.2.1 Design and Built Form regarding setbacks and options testing regarding comments on enhancing the sustainable approach to landscaping and the public domain.

It is also recommended as per comments in 7.2.1 Design and Built Form regarding active transport networks that further options be tested to improve amenity along King Street for employees moving to and from the site as this has only been considered within the site at this point.

7.2.9. Solar Access and Overshadowing

It is noted that the overshadowing diagrams provided on pages 32 and 33 of Appendix D – Architectural Design Report are cropped and do not show the full extent of the overshadowing impacts.