



30 April 2019

Mr Jim Betts  
Secretary  
NSW Department of Planning and Environment  
320 Pitt Street  
SYDNEY NSW 2000

Dear Secretary,

**RE: QANTAS FLIGHT TRAINING CENTRE SSD-10154**

We refer to the State Significant Development Application 10154 (SSD Application) for the development of a new Qantas flight training centre at 297 King Street, Mascot (the Project).

The SSD Application is currently the subject of a test of adequacy assessment with the NSW Department of Planning and Environment (DPE). This letter has been prepared in connection with the Environmental Impact Statement (EIS) to address the Secretary Environmental Assessment Requirements (SEARs) and to outline Qantas' position in relation to the applicability of section 7.11 of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) to the Project.

**Project Background**

As a result of the Sydney Gateway Road Project and Port Botany Rail Duplication Project, the Qantas flight training centre currently located on Sydney's Kingsford Smith Airport (the Existing Facility) will be relocated to Qantas owned land located at 297 King Street, Mascot (the New Facility). The relocation of the Existing Facility is crucial to Qantas' ongoing operations noting it supports mandatory training required by Qantas to maintain its Air Operator's Certificate.

Noting the potential impact of the Project on Qantas' operations and the critical timing associated with the commencement of the Gateway Project, Qantas applied to have the development called-in as a State Significant Development.

On 28 February 2019, the Minister declared the Project to be State Significant Development pursuant to section 4.36(3) of EP&A Act. As such, the consent authority for the SSD Application is the Minister for Planning (or their delegate).



## Project Scope

The New Facility is for all intents and purposes a like-for-like replacement of the Existing Facility save for two additional simulator trainers and will be located just 150 metres to the east of the Existing Facility (which is located on the boundary of the Bayside Local Government Area (LGA)).

For convenience, a description of the Project scope is reproduced below:

- An emergency procedures hall containing cabin evacuation emergency trainers, an evacuation training pool, door trainers, fire trainers slide descent towers, security room, and aviation medicine training and equipment rooms.
- A flight training centre containing a flight training hall with 14 bays that will house aircraft simulators, integrated procedures training rooms, computer rooms, a maintenance workshop, storerooms, multiple de-briefing and briefing rooms, pilot's lounge and a shared lounge.
- Teaching space containing training rooms, classrooms and two computer-based exam rooms and office space.
- Shared amenities including multiple small, medium and large meeting rooms, think tank rooms, informal meeting spaces, a video room and lunch/tea room.
- Ancillary spaces including the reception area at the ground floor, toilets, roof plant and vertical circulation. The external ground floor layout will include a loading dock, at-grade car parking for approximately 39 spaces and a bus drop-off zone at the northern site boundary.
- A new multi storey car park comprising 2,059 spaces for Qantas staff across 13 levels.

It should be noted that there will be no material net increase in the gross floor area when compared to the Existing Facility. It is however anticipated that the New Facility will see a gradual increase in the number of full-time employees to support the growth in flight simulator bays.

### Section 7.11 of the EP&A Act

Section 7.11 of the EP&A Act states that a consent authority may grant development consent subject to a condition requiring the payment of a monetary contribution if it is satisfied that development will or is likely to require the provision of or increase the demand for public amenities and public services within an area. The contribution payable must be of a kind allowed by, and determined in accordance with, the relevant contributions plan.

Under section 7.13 of the EP&A Act, the Minister for Planning (as the consent authority for the Project) has the discretion to decide whether to impose a condition of consent which requires the payment of contributions under section 7.11 or to impose a condition in a manner which does not comply with the relevant contributions plan. Section 7.13 also states that a condition under section 7.11 may be disallowed or amended on appeal if it is not reasonable in the circumstances, even if it was determined in accordance with the relevant contributions plan.

The New Facility will be located within the Bayside LGA and as such, the *Former City of Botany Bay – S7.11 Development Contributions Plan 2016 (Amendment No 1)* (the Contributions Plan) is applicable to the Project.

The Contributions Plan applies to developments of the type identified in Table 1.1 of the Contributions Plan which includes “all other development” in the Mascot Station Precinct. The

qualification for this type of the development is that it would lead to a net increase in gross floor area or employment.

#### **Application of section 7.11 to the Project**

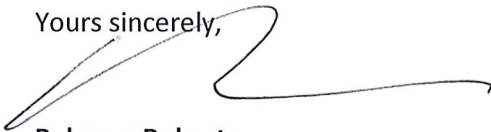
Qantas is of the view that any contributions payable in respect of the Project should reflect only the net increase in demand for public amenities or public services over and above the demand generated by the Existing Facility.

As stated above, there will be a gradual increase in full-time employees based in the New Facility to support the growth in flight simulator bays, however there will be no material net increase in the gross floor area when compared to the Existing Facility. Further, the New Facility will be relocated only 150 metres to the east of the Existing Facility which currently borders the Bayside LGA. As such, Qantas considers any increase to the demand for public amenities or public services will be limited to the future increase in Qantas employees to be based in the New Facility, not via the planned like-for-like replacement.

Having regard to the above, we respectfully submit that it would be reasonable for the payment of contributions to be waived.

Please advise if you require any further information in relation to the above.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Rebecca Roberts', with a long horizontal flourish extending to the right.

**Rebecca Roberts**  
Legal Counsel