

Mr William Hodgkinson

Email: William.hodgkinson@planning.nsw.gov.au

Our Ref: BRD-L-DPE-0008

Thursday 29 August 2019

Dear Mr Hodgkinson

Comment on Qantas Flight Training Centre Submissions Report (SSD 10154)

I refer to your email dated 16 August 2019 inviting the Australian Rail Track Corporation (ARTC) to provide comment on the Qantas Flight Training Centre (the Proposal) Response to Submissions (RtS) Report, including advice on recommended conditions of consent. ARTC's Third Party Interface team and Sydney Project's team have reviewed the RtS Report and has been engaging closely with Qantas directly in an effort to resolve the preferred approach to the issues raised in response to the Environmental Impact Statement.

ARTC would encourage Qantas to continue consultation undertaken to date throughout the construction of the Proposal.

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, Sydney Projects

Interstate Division

Risks to ARTC Assets

Item	Document Reference	ARTC Comment on EIS	Qantas Response	ARTC Comment on RtS
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.	The proponent takes due consideration of the comments raised in regard to permanent access to the ARTC rail corridor. The revised Preliminary Construction Management Plan (Appendix L) confirms that access to the rail corridor will not be impeded by the project or its construction and access will be maintained at all times.	ARTC have no further comment regarding this item.
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.	The proposed landscaping solution for the site includes the retention of all existing trees adjacent to the rail corridor, to be complemented by two additional native <i>Lophostemon confertus</i> trees; the same species as existing which do not have the potential to drop leaves, flowers or branches into the rail corridor. As such the proponent does not consider that the project will result in any additional maintenance requirements for the rail corridor.	ARTC have no further comment regarding this item.

Risks to ARTC Operations and Rail Safety obligations

Item	Document Reference	ARTC EIS Comment	Qantas Response	ARTC Final Comment
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.	The proponent takes due consideration of the safety comments raised in regard to use of construction cranes in proximity to an operating rail corridor. As identified within the revised Preliminary Construction Management Plan (Appendix L), ARTC will have the opportunity to review and approve construction plans and safe work method statements where there is a <u>risk</u> to rail safety. This will ensure compliance with the <i>Rail Safety National Law 2011</i> and a safe work environment for the subject site and immediate surrounding context.	ARTC have no further comment regarding this item.
4	Appendix Z- Civil Engineering Plans and Section 6.1.1. of the EIS General Comment	<p>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 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</p>	The proponent has commenced negotiations to renew the license over the western easement located within ARTC land. These license negotiations will be finalised prior to the expiration of the current lease to allow ongoing use of the land for provision of vehicular access from the proposed site to the western half of the Mascot Campus.	<p>A lease has never been in place with respect to the parcel of land referenced. The previous licence is expired. Qantas access to ARTC land is currently on the basis of month to month hold-over.</p> <p>Negotiations have not yet commenced, however any new licence will be subject to ARTC's operational and commercial requirements.</p>

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		requirements through ongoing discussion around the relevant license.		The updated submission does not address the original comment.
5	Appendix X - Noise and Vibrations Emissions Assessment Section 11.4.1	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>Section 10 the Assessment of Noise and Vibration Emissions Report prepared by NDY outlines the Assessment of Impact From External Sources on the Development. In this assessment consideration has been given to both expected construction works (road, rail and adjoining properties) as well as increased volume of aircraft, rail and road traffic.</p> <p>—</p> <p>Notwithstanding the above, the proposed flight training centre and car park have been designed to mitigate vibration from compliant construction activities within the surrounding area, including those emitted from ARTC's construction sites. These measures include structural isolation, structural design and location of sensitive activities within exclusive parts of the site.</p>	The Acoustic Report developed by NDY was not based on plant and equipment commensurate to ARTC's Operation and Maintenance works and requirements. ARTC's position still stands that ARTC does not support limitation to its standard operations and maintenance in proximity of the Qantas Flight Facility.
6	Appendix AA - Infrastructure Report Page 4 – Car Park	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.	Full design provided	ARTC have no further comment regarding this item.

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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. 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>	<p>The Amended Flooding Documentation (Appendix O) contains a revised assessment of the results of the updated TUFLOW flood modelling. The results demonstrate that outside of the site, there is no impact on flood levels or behaviour, with no impact on the ARTC corridor. As the preliminary flood studies demonstrate there will be no impact, it is not considered that the imposition of a condition of consent regarding this matter is necessary.</p> <p style="text-align: center;">—</p>	ARTC have no further comment regarding this item.
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 to safety of ARTC infrastructure, operations and people are not introduced as a result of this proposal.</p>	<p>The proponent is committed to ongoing consultation with ARTC throughout the construction process and will ensure there will be no operational impacts to the adjacent rail line. This consultation will be comprised of ongoing meetings, during which the following matters will be raised:</p> <ul style="list-style-type: none"> • All proposed earthworks, including piling and excavations, in the vicinity of the rail corridor including safe work method statements and construction methodologies; and • Coordination of overlapping construction programs in relation to the Rail Corridor Duplication and the project. 	ARTC have no further comment regarding this item.

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			Refer to the revised Preliminary Construction Management Plan provided at Appendix L .	
9	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>	As discussed earlier the proposed development will have no impact on flood levels or behaviour outside the site or on the ARTC corridor. Refer to further discussion and results of the flood modelling within the Amended Flooding Documentation, provided at Appendix O .	ARTC have no further comment regarding this item.
10	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.	The provision of an OSD system on the site is not necessary as stormwater discharges directly to the Sydney Water channel via the existing stormwater connections, with no impact on any Council stormwater infrastructure. This position has been confirmed within correspondence received from Sydney Water, provided within the Amended Flooding Documentation provided at Appendix O .	ARTC have no further comment regarding this item.

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

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11	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.	The proponent has demonstrated a commitment to ongoing clear and transparent communication with the community throughout the entirety of the SSD process. <u>This</u> communication strategy will continue during the construction program with both the local community and surrounding stakeholders to ensure clear delineation between projects and minimise where possible construction 'fatigue' associated with noise and traffic impacts from multiple construction sites.	ARTC have no further comment regarding this item.
12	Appendix DD-Preliminary Construction Management Plan Section 6.4.12	The EIS does not outline how Qantas proposes to continue to engage with ARTC as adjacent landowners. 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.	As noted above, the proponent will maintain a commitment to ongoing collaboration with surrounding stakeholders. The proponent and ARTC have committed to holding monthly (or as required) stakeholder meetings during the construction phases of both the project and Botany Rail Duplication project, providing a platform for continual dialogue and resolution of issues.	ARTC have no further comment regarding this item.

			Ongoing consultation has occurred between the proponent and ARTC, with the matters outlined in the submission above considered to have been suitably addressed.	
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