

Request for Ministerial Call-In

Sydney Flight Training Centre

Report to the Independent Planning Commission

June 2022



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Cover image Qantas A380 flying over Sydney Harbour (Source: Google)

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Glossary

Abbreviation	Definition
CASA	Civil Aviation Safety Authority
CBD	Central Business District
CIV	Capital Investment Value
Commission	Independent Planning Commission
Council	City of Sydney Council
Department	Department of Planning and Environment (DPE)
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
FTC	Flight Training Centre
LGA	Local Government Area
LEP	Local Environmental Plan
Minister	Minister for Planning
Planning Secretary	Secretary of the Department of Planning and Environment
RMS	Road and Maritime Services
SEPP	State Environmental Planning Policy
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
SSD	State Significant Development
Sydney Airport	Sydney Kingsford Smith Airport
The Guideline	Guideline on 'call-in' of State significant development under the <i>Environmental Planning & Assessment Act 1979</i>
Three Cities	The Three Cities comprising the Eastern Harbour City, the Central River City and the Western Parkland City, as described in the <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>

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1 Background

1.1 Ministerial Call-In

LOGOS Development Management Pty Ltd (LOGOS) has submitted a call-in request under Section 4.36(3) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to the Minister for Planning (the Minister) to declare the proposed Sydney Flight Training Centre at St Peters State significant development (SSD). The call-in request is included in **Appendix A** of this report.

This report presents the Department of Planning and Environment's (the Department) consideration of the call-in request in accordance with the Department's *Guideline on 'call-in' of State significant development under the Environmental Planning & Assessment Act 1979* (the Guideline).

1.2 Development Background

LOGOS, in partnership with Qantas Group (Qantas) and CAE Inc. (formerly Canadian Aviation Electronics), seeks to develop a new Flight Training Centre (FTC) at 28-30 Burrows Road, St Peters within the City of Sydney local government area (LGA).

A FTC contains full motion aircraft simulators, aircraft cabin mock-ups and multimedia learning centres in order to train pilots and associated flight crew. The facility is critical to aviation operations to ensure all pilots and flight crew comply with Civil Aviation Safety Authority (CASA) regulations required to fly.

Qantas is Australia's National Carrier, operating a significant number of domestic and international services daily. For over 50 years, Qantas trained its pilots and cabin crew primarily at the Qantas Flight Training Centre (FTC) within the Jetbase at Sydney Kingsford Smith Airport (Sydney Airport).

In 2018, the NSW Government announced its intention to improve transport connections to Port Botany and upgrades to the surrounding road and rail network with a project known as the Sydney Gateway Project (described further in Section 1.5). The Gateway project included the widening of Qantas Drive at Sydney Airport, which resulted in the partial demolition of the Qantas FTC, meaning the facility would not be usable in the future.

In response to this proposed impact and to replace the FTC, an alternate site in Sydney for a new FTC (known as King Street North) was approved in November 2019 as a State significant development (SSD-10154, declared by previous Ministerial call-in). However, prior to construction commencing at the King Street North site, Qantas experienced significant impacts with the downturn in the aviation industry caused by the COVID-19 pandemic. The land was also subsequently sold by Qantas during the COVID-19 pandemic period.

In April 2022, Qantas vacated its FTC site at Sydney Airport, meaning there is no FTC available in Sydney or NSW. All pilots and flight crew are trained at FTC simulators outside of NSW (in Brisbane and Melbourne).

As the airline industry recovers from the COVID-19 pandemic and demand for flight services increase, Qantas has advised utilising FTC simulators outside of NSW for the benefit of Australia's busiest airport, Sydney Airport, is not a viable long-term option.

Under CASA regulations, pilots and flight crew are required to conduct regular ongoing mandatory testing and training to maintain their qualifications to fly. For pilots, this includes training and testing on the particular aircraft model they fly from the fleet. As such, an FTC located in Sydney is vital for Qantas and other industry airline pilots and cabin crew to fulfill their training requirements.

An FTC located in Sydney is also critical in order to provide training facilities to deliver Qantas' new ultra-long-range flying service (Project Sunrise). Project Sunrise will only operate from Sydney Airport, and will utilise a new A350 aircraft model which allows non-stop flights from Sydney Airport to London and New York. The proposed Sydney FTC will be the only facility to provide key A350, A320 and A380 simulator model aircraft training infrastructure currently not available elsewhere in Australia.

An FTC located in Sydney would provide an efficient and convenient location for Qantas and other industry airline pilots and cabin crew to undertake training in order to comply with CASA regulations required for each aircraft model.

The New South Wales Government has recognised the strategic and economic benefit of an FTC in Sydney. As part of a Funding Agreement (dated 13 December 2021), Qantas committed to provide an operational FTC in Sydney by July 2024.

1.3 Site Context

The proposed site (the site) is located at 28-30 Burrows Road, St Peters, covering an area of 7,961 m². The site is located within the IN1 General Industrial area under the *Sydney Local Environment Plan* 2012.

The site is located approximately six kilometres (km) to the south-west of the Sydney central business district (CBD), and around one kilometre north of Sydney Airport. The site currently contains two warehouses with large hardstand areas and is located immediately adjacent to Alexandra Canal (see Figure 1).



Figure 1 | Site Location

1.4 Site and Surrounding Uses

The site for the proposed FTC is in close proximity to Sydney Airport, and Qantas' Corporate headquarters (see **Figure 2**). The location is critical to ensure the FTC has efficient connections to the airport terminals and Qantas headquarters.

The site is located close to the Gateway Project which will link the new St Peters Interchange with Sydney Airport domestic and international terminals, as well as connecting to Port Botany. Surrounding land uses include:

- industrial land uses along Burrows Road and Euston Road, with additional industrial activities on the opposite side of Alexandra Canal, within Alexandria
- St Peters Interchange which provides access to the M8 Motorway Tunnel via Gardeners Road and Euston Road, with the future M4-M5 Link Tunnels (currently under construction) creating further opportunities for access from the site to the regional road network
- Sydenham and St Peters Railway are also located within 1.5 kilometres of the subject site

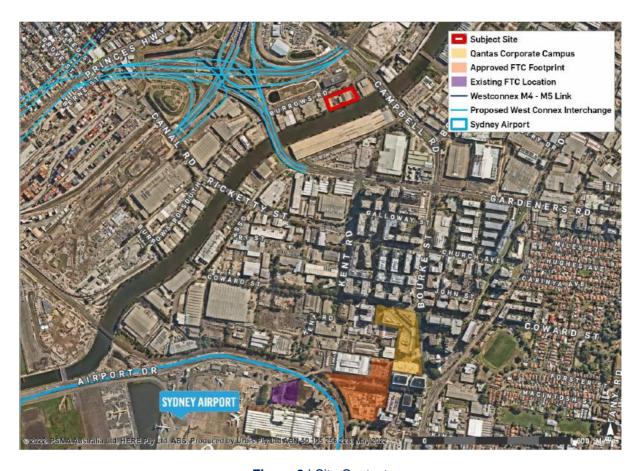


Figure 2 | Site Context

1.5 Sydney Gateway Project

In September 2018, the Roads and Maritime Services (RMS) announced the Sydney Gateway Project (Gateway Project) to improve connections to Port Botany and Sydney Airport by increasing the capacity of the surrounding road and rail network.

As Sydney Airport and Port Botany were recognised as important international gateways forecasted to grow significantly over the next 20 years, a new alternative route to the domestic and international airport terminals was included as part of the project. This resulted in Qantas Drive at Sydney Airport being widened, requiring the partial demolition of the previously utilised Qantas FTC.

In response to this proposed impact and to replace this FTC, an alternate site in Sydney for a new FTC (known as King Street North, see **Figure 2**) was approved in November 2019 as a State significant development (SSD-10154, declared by previous Ministerial call-in). However, the King Street North proposal was not developed due to the significant impacts Qantas experienced with the downturn in the aviation industry caused by the COVID-19 pandemic. The land was also subsequently sold by Qantas during the COVID-19 pandemic period.

As a result, a more appropriate site to locate an FTC has been identified at 28-30 Burrows Road, St Peters.

2. Development

2.1 Development Description

The proposed development is for the construction and operation of a new FTC, which will consist of advanced technological aircraft simulators to allow pilots and crew to undertake high level theoretical and practical flight training (see **Figure 3**).



Figure 3 | Image of simulator hall

The proposal includes providing new and unique flight simulators that are not currently available in any other Australian state, such as the Airbus 320, A380 and A350 flight simulators. The A350 simulators are vital to support Qantas' new ultra-long-range flying service from Sydney (Project Sunrise).

The proposed FTC would include the components as shown in **Figure 4** and **Figure 5** and as described below:

- flight training components, including:
 - eight (8) full motion simulators with visual function, motion and sound to allow crew to be trained in all aspects of normal and emergency operations
 - o cabin evacuation emergency trainers or full-scale cabin mock-ups to simulate routine and emergency procedures
 - o slide descent tower for the training of deployment and use of slides during an evacuation
 - o door trainers to simulate use of emergency exits
 - computer rooms, multimedia centres, briefing and debriefing rooms.

- ancillary spaces, including:
 - equipment rooms storage of emergency equipment (oxygen tanks, defibrillators etc.) that
 supports the training and assessment of cabin crew and pilots on aviation medicine
 - o pilot lounge area, lunchroom, reception area, toilet facilities
 - loading dock.

CAE Inc. will provide the motion simulators, aircraft cabin mock-ups and multimedia learning centres for the proposed FTC.

The FTC would operate 24 hours, 7 days a week.

The indicative capital investment value of the proposal is \$60 million.



Figure 4 | Conceptual Site Layout (Ground Floor)

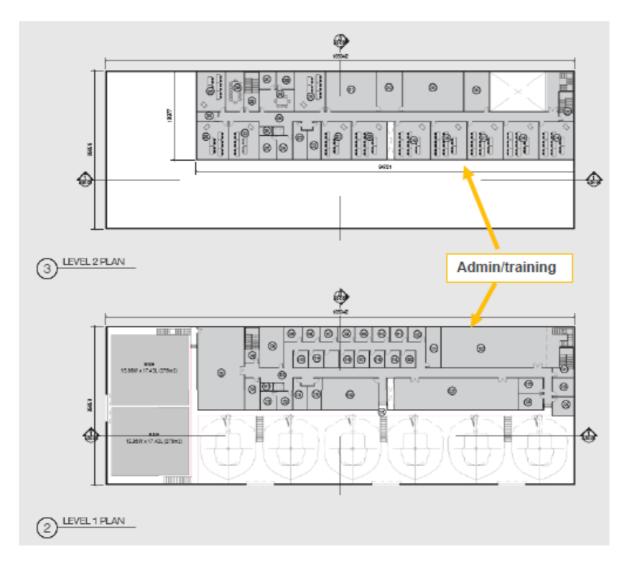


Figure 5 | Conceptual Site Layout (Level 1 & 2)

2.2 Need and Justification for Call-In

LOGOS considers the proposal is of State planning significance and requests it be declared SSD for the following reasons:

- the proposal would ensure airline industry users, including Qantas, and the broader operations of Sydney Airport are supported by providing flight training infrastructure not available elsewhere in Australia
- the proposal will provide the essential infrastructure to train airline pilots and crew for the new A350 aircraft as part of Qantas Project Sunrise, which will only operate from Sydney Airport
- the proposal is vital to maintaining aviation safety regulations and legislative requirements for all other aircraft models supporting the broader and Qantas airline industry users
- without a functioning flight training centre in Sydney, Qantas and other airline industry users cannot carry out future operations without compromising safe and efficient operations

- the proposal would ensure Qantas and other airline operations and the broader operations of Sydney Airport are not impaired while also supporting airport-related land uses and infrastructure in the area around the airport and Port Botany
- the proposal would require coordination between multiple Government agencies with the Department experienced in coordinating assessments of this nature.

3 Strategic Context

3.1 Strategic Planning

The Department has considered the call-in request against the provisions of several key strategic planning documents. The proposal is consistent with:

- the objectives in the Metropolis of Three Cities the Greater Sydney Region Plan (2018) to facilitate
 the development of FTC infrastructure that supports and protects the operation of the aviation
 industry and Sydney Airport
- the objectives of the Eastern City District Plan, including:
 - o protecting the airport's function as an international gateway for passengers and freight
 - o providing specific flight training infrastructure that would be unique to Sydney
 - o training infrastructure to support Qantas' recent announced investment in new aircraft
- the objectives of the Future Transport Strategy 2056, including:
 - o protecting the long-term growth of Sydney Airport via the operational FTC
 - providing the only simulators to support the new A350 aircraft operating solely from Sydney Airport
- the objectives of the EP&A Act to promote and coordinate the orderly and economic use and development of land
- the objectives of the industrial zoning of the site under the Sydney Local Environmental Plan 2012.

The Department's consideration of the call-in request in relation to these strategies and plans is detailed further in **Section 6**.

4 Statutory Context

4.1 Call-in Power

Section 4.36(3) of the EP&A Act provides the Minister may, by order published in the Gazette, declare specified development on specified land that is not declared by a State environmental planning policy under section 4.36(2) to be SSD. This can only occur if the Minister has obtained and made publicly available advice from the Independent Planning Commission (the Commission) about the State or regional planning significance of the development.

4.2 Zoning and Permissibility

The site is zoned as IN1 – General Industrial in the *Sydney Local Environmental Plan 2012*. The proposed flight training centre is defined as an industrial training facility, which is permitted with consent within this zone.

4.3 Principal Development Standards

The proposal complies with the principal Development Standards (Height of buildings and Floor Space Ratio), of the Sydney Local Environment Plan 2012 (see **Table 1**).

Table 1 | Compliance with SLEP Development Standards

Development Standard	Control	Proposed	Complies
Clause 4.3 Height of Buildings	18 m	18 m	Yes
Clause 4.4 Floor pace Ratio	1.5:1	0.73:1	Yes

4.4 Planning Pathway

Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP) lists classes of development that are considered to be of State significant. LOGOS investigated two possible classes for the proposal, which are described below.

Air Transport Facility

Clause 17 of Schedule 1 relates to development for the purpose of air transport facilities that has a capital investment value of more than \$30 million.

The Standard Instrument, contains the following definitions:

air transport facility means an airport or a heliport that is not part of an airport, and includes associated communication and air traffic control facilities or structures.

airport means a place that is used for the landing, taking off, parking, maintenance or repair of aeroplanes, and includes associated buildings, installations, facilities and movement areas and any heliport that is part of the airport.

As the proposal does not meet the definition of an air transport facility and the site is not located on land parcels that comprise of Sydney Airport, the proposal would not be classified as SSD under these definitions.

Educational Facility

Clause 15 of Schedule 1 relates to development for the purposes of education facilities, and identifies that the following would be SSD:

- (1) Development for the purpose of a new school (regardless of capital investment value).
- (2) Development that has a capital investment value of more than \$20 million for the purpose of alterations or additions to an existing school.
- (3) Development for the purpose of a tertiary institution (within the meaning of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017, including associated research facilities, that has a capital investment value of more than \$30 million.

As the proposal is neither a new school nor a tertiary institution, the proposal would not be classified as SSD under this definition.

5 Engagement

As detailed in the Department's *Guideline on 'call-in' of State significant development under the Environmental Planning & Assessment Act 1979*, the Department consulted with City of Sydney Council (Council) to seek its views on the call-in request.

On 17 May 2022, the Department provided a copy of the call-in request to Council and requested its views. On 30 May 2022, Council advised the Department it does not agree that the development is State Significant with the view that the proposal does not satisfy all the determining factors of Part 5 of the Guideline on 'call-in' of State significant development under the Environmental Planning & Assessment Act 1979.

While Council noted the critical nature of the development, Council is of the opinion the development is not of a scale to be considered as State significant and objects to the Applicant's use of the 'call-in' power under section 4.36(3) of the EP&A Act.

Council's advice on the call-in request is attached at Appendix B.

6 Consideration of Call-In Request

When determining the State or regional planning significance of a development proposal, the Minister has requested the Commission to consider six issues in addition to any other matter the Commission considers relevant to its consideration. **Table 2** describes each of these issues and presents LOGOS' and the Department's consideration of these.

Table 2 | Consideration of Issues

LOGOS's Consideration

Department's Consideration

Issue 1

Whether the proposal is of regional or State importance because it is an identified strategic location, or is critical in advancing the nominated strategic direction or achieving a nominated strategic outcome, contained in a relevant State policy, plan or strategy, or regional or sub-regional strategy

- The proposal is located within a regionally significant trade gateway, being Sydney Airport.
- The relocation of the existing FTC allowed for the delivery of the Gateway Project, which is critical road infrastructure.
- The proposal is crucial to Qantas Australia maintaining operations as a global and national airline in addition to supporting the efficient operation of Sydney Airport.
- The proposal would assist in achieving the strategic vision and objectives of the Metropolis of Three Cities, Future Transport Strategy 2056 and Eastern City District Plan by facilitating protecting and reinforcing the Airport's function as an international gateway for passengers and freight.
- The proposed facility will house essential simulator infrastructure unique to Sydney and not available in other states.
- The proposal would contribute to the generation of long-term jobs.

The Department considers:

- the proposal is of State importance as it would assist in supporting the growth of Sydney Airport
- the proposal is consistent with the objectives in the Metropolis of Three Cities – the Greater Sydney Region Plan (2018) by ensuring airline operations have access to a flight training facility in Sydney to support the efficient operation of Sydney Airport
- the proposal is consistent with the objectives in Future Transport Strategy 2056 by ensuring the proposed land-use and transport planning of the FTC protects supports and reinforces the Airport's function
- the proposal is consistent with the objectives in the Eastern City District Plan to retain surrounding industrial land to provide supporting functions for the safe and efficient operation of Sydney Airport by providing training facilities for pilots and flight crew
- the proposal supports the growth of operations of Sydney Airport by providing the space for the unique flight training infrastructure not available anywhere else in Australia

The Department concludes the proposal is of State significance as it would advance the strategic direction of the *Metropolis of Three Cities*, the *Eastern City District Plan and the Future Transport Strategy 2056.*

LOGOS's Consideration

Department's Consideration

Issue 2

Whether the proposal delivers major public benefits such as large-scale essential transport, utility infrastructure, or social services to the community?

- The new FTC is required to ensure Qantas future operations are not impacted.
- Therefore, the project is a crucial component in the delivery of the ultra-long-range flying from Sydney Airport ("Project Sunrise") and the continued and safe operation of Qantas aircraft and Sydney Airport.
- The proposal would contribute to the generation of long-term jobs.

The Department considers:

- the project would ensure continuity to the expanding Qantas and broader airline industry operations without compromising the safe and efficient operation of Sydney Airport, which serves the transport needs of the local and regional community
- the development of an advanced and modern flight training facility would provide significant public benefit by maintaining highly trained pilots and flight crew essential for airline freight services, and domestic and international travel
- while the project itself would not provide large-scale essential transport or infrastructure, the proposal supports essential infrastructure to the State, being Sydney Airport.

Issue 3

Whether the proposal is likely to have significant environmental, social or economic impacts or benefits, be of a significant hazardous or environmentally-polluting nature, or is located in or in close proximity to areas or locations that have State or regional environmental, archaeological or cultural heritage significance.

- The project is not expected to be potentially hazardous nor would it result in significant environmental impacts.
- The project is not expected to result in unreasonable impacts on the adjoining State Heritage listed Alexandra Canal.
- The proposal will have significant economic benefit via supporting the growing operations of Sydney Airport.
- The proposal will have significant benefit via providing proposed simulators unique to Sydney.

The Department considers:

- the project is located in close proximity to Sydney Airport which is an important and nationally significant passenger and freight gateway
- the proposal would not result in significant environmental impacts but will provide significant economic benefits by protecting Sydney Airport's function as an international gateway for passengers and freight, and maintaining the efficient operation of Sydney Airport
- the potential grounding of the new Qantas ultra long-rang flight service, utilising the A350 aircraft would have a significant impact on the economy across a broad range of sectors including tourism, business and financial services
- lack of a flight training facility in NSW has a significant impact on the ability to provide the required legislated industry specific skill,

LOGOS's Consideration

Department's Consideration

- knowledge and capacity for pilots and airline flight crew
- the proposed activities relating to the flight training centre are not expected to be potentially hazardous including potential impacts to the adjoining Alexandra Canal.

Issue 4

Whether the proposal is of significant economic benefit to the region, the State or the national economy, such as those with high levels of financial investment and continuing or long-term employment generation?

- The proposal is central to the Qantas operations and provides significant economic benefit to the local, regional and national economies.
- Disruption to the availability and operation of the flight training centre could result in the potential grounding of Qantas fleet and delivery of the new ultra long-range flying service.
- Disruption to airline operations and Sydney Airport affect the National economy across various sectors including tourism, business, freight and logistics.
- The proposed FTC ensures long-term airline related jobs can continue to remain in Sydney.

The Department considers the proposal:

- would enable the site to contribute to long-term employment generation by providing the flight training centre and other supporting functions in Sydney
- the potential grounding of the Qantas and other airline fleet would have a significant impact on the national economy across a broad range of sectors including tourism, business and financial services
- as part of the NSW Government Funding Agreement (dated 13 December 2021), Qantas committed to provide an operational FTC in Sydney by July 2024 demonstrating strategic and economic benefit of a FTC in Sydney
- presents a unique opportunity for redevelopment of the site to provide an advanced and modern FTC
- would facilitate the availability of flight simulator infrastructure unique to Sydney to support the economic growth of the industry and the Sydney region, in line with strategic objectives
- will provide the essential infrastructure in order to train airline pilots and crew for the new A350 aircraft as a part of Qantas Project Sunrise, unique to Sydney airport
- will provide essential simulator infrastructure for several types of other aircraft models currently not available in Sydney such as A320, A380 and Business Jet ensuring long-term employment generation
- would ensure Qantas and other airline pilots and flight crew maintain testing in all models of

LOGOS's Consideration	Department's Consideration	
	aircrafts, including routine and emergency	
	procedural environments, to meet regulatory and	
	legislative requirements.	

Issue 5

Whether the proposal is geographically broad in scale, including whether it crosses over multiple council and other jurisdiction boundaries, or impacts a wide area beyond one local government area

This is not considered to be a relevant determining issue.

- While the proposal is not geographically broad in scale, the Department considers it is best placed to consider the project given the established history for the previous Qantas FTC (SSD-10154), and efficiency of delivery given the projects importance to be undertaken in a timely manner.
- The Department concludes it is best placed to undertake a coordinated and streamlined environmental assessment under the SSD legislation, and ensure an appropriate level of input from the multiple agencies that have a role in regulating the project.

Issue 6

Whether the proposal is complex, unique or multi-faceted and requires specialist expertise or State coordinated assessment, including where councils require or request State assistance.

The project:

- is a specialised facility that plays a central role in supporting Qantas, other airlines and the Sydney Airports business operations
- is unique given the timeframe for the delivery of the Qantas ultra long-rage flying service
- given the Departments history with the initial Project (declared SSD in February 2019) the Department is considered the most appropriate to coordinate the range of government stakeholders.

The Department considers:

- the proposal is unique due to the timeframes required by Qantas for the operation of A350 aircraft service, and the funding arrangement between the NSW Government and Qantas which includes a commitment by Qantas to have new simulator facilities operating in Sydney by July 2024
- the Department is best placed to coordinate the assessment given the established history of the assessment and approval for the previous Qantas FTC (SSD-10154), and established relationships between Government agencies to ensure key issues are appropriately identified, assessed and coordinated in a timely manner
- due to the sensitive nature of flight training simulators, noise and vibration impacts on the operation of the FTC from internal and external sources will require critical and technical consideration. Vibration impacts on sensitive

LOGOS's Consideration	Department's Consideration
	equipment is a complex assessment issue, which will require specialist evaluation. The Department has vast experience in noise and vibration, and also has in-house expertise to support this assessment
	the site is also located in close proximity to the Alexandra Canal which means the site will be flood affected requiring careful consideration and co- ordination with agenciesthe Department has previous experience coordinating and approving

Conclusion

The Department considers the project is of State planning significance and would benefit from an SSD declaration because:

- the Sydney FTC proposal provides a critical component of airline operations for Qantas and other aviation industry pilots and flight crew to maintain aviation safety regulations and legislative training requirements for all aircraft models
- the proposal is essential for the delivery of the Sydney based Qantas ultra-long-range flying service (Project Sunrise) via the provision of the A350 flight simulator that is not available elsewhere in Australia
- the proposal is vital to maintain efficient connections from the FTC to the Sydney airport terminals and Qantas headquarters
- the proposal ensures Qantas achieves its commitment as part of the NSW Government Funding Agreement to have new simulator facilities in place and operating in Sydney by July 2024
- the FTC will also be the only training facility in Sydney, allowing it to provide support to not only
 Qantas but other airline operators thereby providing a broader benefit to the aviation industry
- there are some complexities in relation to noise and vibration due to the sensitive nature of the simulators, and potential flooding issues due to the proximity of the site to the Alexandra Canal, which will require technical expertise and multi-stakeholder engagement
- the proposal integrates land-use and transport planning to contribute to long-term employment generation protecting Sydney Airport's function
- the Department history with the previous Qantas Flight Training Centre (SSD-10154) means it
 understands the key issues associated with the project and is best placed to coordinate the
 technical input from State government agencies to ensure the proposal is delivered in a timely
 manner.

Recommendation

It is recommended the Independent Planning Commission:

- considers the LOGOS request and the Department's consideration as outlined in Section 6
 of this report
- provide advice on the State or regional planning significance of the proposal in accordance with the six general issues relating to State or regional planning significance
- **provide** advice to assist the Minister for Planning in his decision on whether or not to call-in the proposal as State significant development.

C. Retike 15 June 2022

27 June 2022

Chris Ritchie

Director

Industry Assessments

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Executive Director

Energy, Resource and Industry Assessments

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Appendices

Appendix A – Applicant (LOGOS Property Management Pty Ltd) Call-In Request

Appendix B - City of Sydney Council Submission