

PO Box 7608, St Kilda Road, Victoria 8004, Australia

26 August 2025

Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

Dear Sir/Madam,

2a Llewellyn Street: Prescribed Airspace Heights and Implications

I am the aviation consultant engaged by Leeds Investment Pty Ltd to address aviation matters associated with the development at 2a Llewellyn Street, NSW 2138 (application reference SSD-67508739). The development involves the construction of seven building towers. This letter presents the heights of prescribed airspace above 2a Llewellyn Street and implications for buildings and cranes. It also assesses the impact on emergency helicopter operations at Concord Hospital.

1.0 Prescribed Airspace

This section details the distance of 2a Llewellyn Street from Sydney and Bankstown airports. It then describes the heights of the three categories of prescribed airspace above 2a Llewellyn Street, namely the Bankstown obstacle limitation surface (OLS), PANS-OPS surface and Sydney radar terrain contour chart (RTCC) surface. Detail about prescribed airspace was obtained from Bankstown Airport Ltd and Sydney Airport Corporation Ltd, as well as information held by this consultant.

1.1 Distance from Bankstown and Sydney Airports

The development site is located at 2a Llewellyn Street is located approximately 13.4km from Bankstown Airport and 14.5km from Sydney Airport.

1.2 Obstacle Limitation Surface (OLS)

The height of the OLS at 2a Llewellyn Street is 156m AHD. Permanent

(buildings) and temporary (cranes) obstructions may be approved to penetrate the OLS in accordance with the Airports (Protection of Airspace) Act 1996.

1.3 PANS-OPS Surface

The height of the PANS-OPS surface is governed by the surfaces defined for both Bankstown and Sydney airports. At 2a Llewellyn Street the height of the Sydney PANS-OPS height is 335.2m AHD. The Bankstown PANS-OPS surface is 350m AHD. Since the lower height applies, the height of the PANS-OPS surface is 335.2m AHD.

1.4 Radar Terrain Contour Chart (RTCC) Surface

The height of the Sydney RTCC surface is 243.8m AHD. Normally no penetrations are permitted of the RTCC, although in some circumstances a three-month temporary approval for crane operations may be approved. Any penetration of the RTCC cannot impact the safety and regularity of air transport operations.

1.5 Summary

Any building or crane that penetrates the OLS (156m AHD) requires an aviation approval. The lower of the PANS-OPS and RTCC surfaces governs the height of permanent obstructions, this height is 243.8m AHD.

2.0 Maximum Building Heights and Impact on Prescribed Airspace

Table 1 below details the maximum height of the seven building towers and their impact on prescribed airspace.

Table 1: Impact of Building Towers on Prescribed Airspace

	Max. Height	Impact on OLS
NW Tower	112.6m AHD	43.4m below OLS 222.6m below PANS-OPS 131.2m below RTCC
SW Tower	97.4m AHD	58.6m below OLS 237.8m below PANS-OPS 146.4m below RTCC
N Concord	49.8m AHD	106.2m below OLS 285.4m below PANS-OPS 194.0m below RTCC
E Concord	44.7m AHD	111.3m below OLS 290.5m below PANS-OPS 154.4m below RTCC
S Concord	49.5m AHD	106.5m below OLS 285.7m below PANS-OPS 194.3m below RTCC
N Terraces	36.5m AHD	119.5m below OLS 298.7m below PANS-OPS 207.3m below RTCC
S Terraces	31.2m AHD	124.8m below OLS 304m below PANS-OPS 212.6m below RTCC

The table shows that all seven building towers are below the OLS, PANS-OPS and RTCC. This means the buildings will not require an aviation approval. There is at least 43.4m freeboard from the top of the tallest building (NW Tower) to the bottom of the OLS and 131.2m to the RTCC.

3.0 Implications for Building and Crane(s)

This section details the implications of prescribed airspace on the buildings and cranes at 2a Llewellyn Street.

2.1 Obstacle Limitation Surface (OLS)

As noted above, each building tower is below the OLS. This means that no aviation approval is required.

The construction strategy will likely determine whether crane operations will penetrate the OLS. If hammerhead cranes undertake construction, it is almost certain that these activities will be performed below the OLS. Luffing cranes will probably enter the OLS, thereby requiring an aviation approval. I see no reason why an aviation approval for cranes at 2a Llewellyn Street will

not be granted by the Department of Infrastructure, Transport, Regional Development, Communication Sport and the Arts (DITRDCSA).

2.2 PANS-OPS and Radar Terrain Contour chart (RTCC) Surfaces

Since the Sydney RTCC surface (243.8m AHD) is lower than the PANS-OPS surface (335.2m AHD), it is the controlling surface above 2a Llewellyn Street. This means that the maximum permissible crane height is 243.8m AHD. There is 131.2m freeboard between the top of NW Tower and the bottom of the RTCC. This means there is little, if any, prospect that luffing cranes will penetrate this surface.

2.3 Summary

The building towers are all below the OLS and do not require an aviation approval. If used, luffing cranes may penetrate the OLS and require approval from DITRDCSA. Luffing cranes will not penetrate the RTCC or PANS-OPS surfaces.

3.0 Impact on Emergency Helicopter Operations at Concord Hospital

The 2a Llewellyn Street development site is located approximately 1.2km north of the Concord Hospital Helipad. Two flight paths are provided to the helipad: to the northeast over Yaralla Bay; and to the south over park land. These flight paths are clear of the development site.

In conclusion, all building towers at 2a Llewellyn Street are below the OLS. Only luffing cranes, if chosen to undertake construction, are likely to penetrate the OLS and require an aviation approval. The development site is clear to the north of the emergency helicopter flight paths to the Concord Hospital.

Please contact me if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "I.W. Thompson". The signature is written in a cursive style with a horizontal line at the end.

Ian Thompson

Director

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