

4 March 2026

Mr Anthony Simac
Development Manager
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180-186 Burwood Rd
Burwood NSW 2134

AVIATION CONSTRAINTS: EDMONDSON PARK

Dear Anthony,

Thank you for providing Avlaw Aviation Consulting Pty Ltd (Avlaw) an opportunity to provide high-level advice in the form of this constraints letter. This letter intends to identify if your proposed developments at Edmondson Park (across Sites 3, 4 & 5), which are located on Lots 4-5, 6-7 and 8 Buchan Avenue, Edmondson Park in NSW have any impacts on aircraft operations and if any aviation approval requirements are triggered. Site boundaries for each of the three (3) sites at Edmondson Park are shown in Figure 1 below.



Figure 1: Site Plan (Source: Urban Property Group)

Our understanding of the proposed developments is as follows:

Site 3

- Buildings ranging from 9 levels – 13 levels (refer email 3 March 2026 - UPG to Avlaw)
- Maximum Building Height is RL 108.400 m AHD (refer email 3 March 2026 - UPG to Avlaw)

Site 4

- Two towers ranging from 15 levels and 25 levels (refer email 3 March 2026 - UPG to Avlaw)
- Maximum Building Height RL 142.400 m AHD (refer email 3 March 2026 - UPG to Avlaw)

Site 5

- Two buildings ranging from 25 levels and 39 storeys (refer email 3 March 2026 - UPG to Avlaw)
- Maximum Building Height RL 190.635 m AHD (refer email 3 March 2026 - UPG to Avlaw)

From the summary above, the tallest building is proposed on Site 5 at RL 190.635 m AHD. Figure 2 below shows the indicative building layout and Figure 3 shows indicative perspective building layout.



Figure 2: Indicative Building Layout (Source: Urban Property Group)

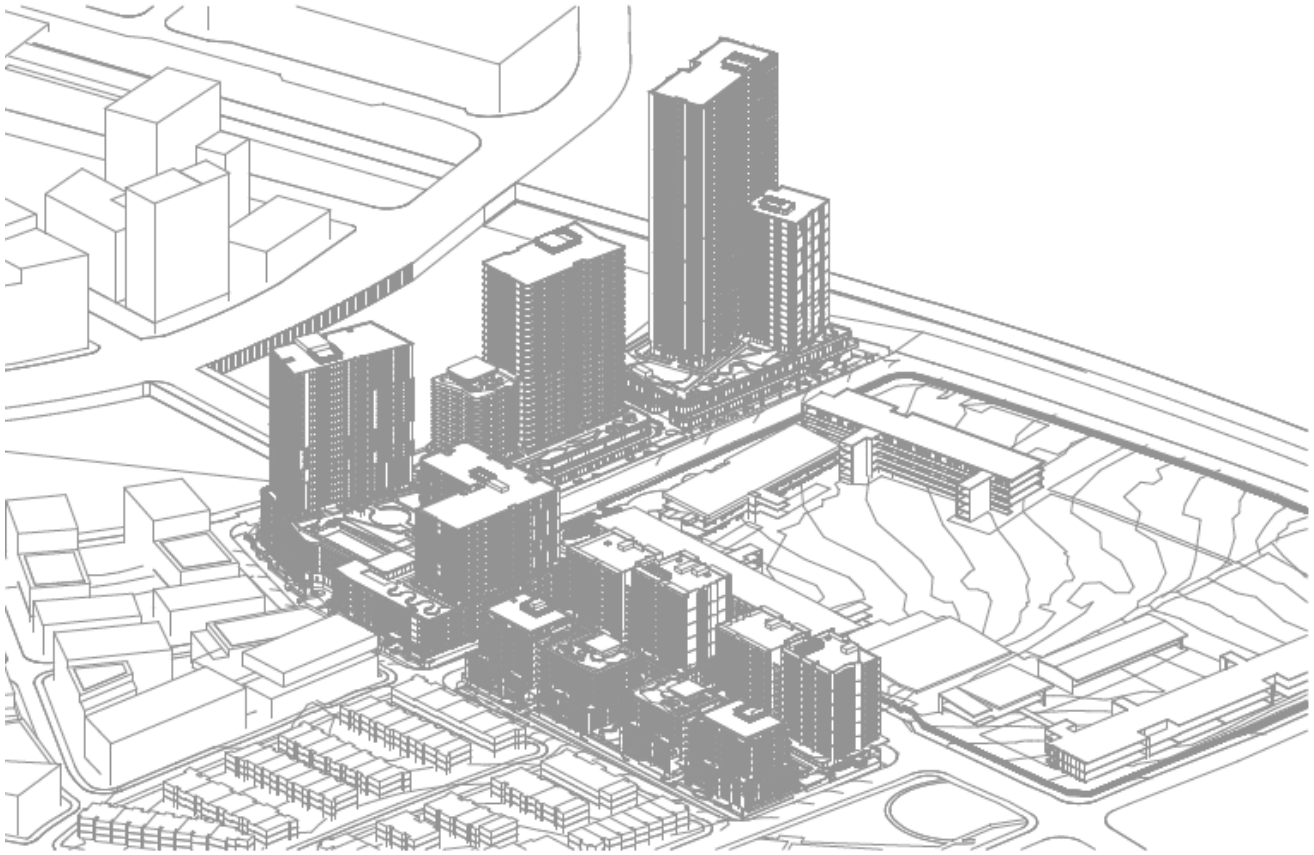


Figure 3: Indicative Perspective Building Layout (Source: Urban Property Group)

Aviation Considerations for Proposed Developments

Developments on or off airports must ensure that they do not compromise airport/aircraft operations and the safety of flight. Where non-compliances are identified, an aviation risk assessment will be required in order to satisfy the approving authority, which is the Commonwealth Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) for all federally leased airports, including Western Sydney International (Nancy-Bird Walton) Airport (WSI). The Department will coordinate and seek advice from the Civil Aviation Safety Authority (CASA) for aviation safety matters and Airservices Australia for safe aircraft navigation and aircraft flight procedures, as required.

Airports are not the approving authority, but a referring authority; however, they have a significant influence when opposing any off-airport development that is not compatible with their airport/aircraft operations.

Any development around a military aerodrome that is non-compliant with the guidelines must be referred to the Department of Defence for its own assessment.

National Airports Safeguarding Framework

Federal and State planning authorities, along with approving jurisdictions, have adopted the National Airports Safeguarding Framework (NASF) as a planning criterion for the assessment of proposed developments on or off the airport.

The NASF is a national land use planning framework for airports developed by the National Airports Safeguarding Advisory Group (NASAG). The NASAG comprises of Federal, State and Local Government and was established in accordance with the National Aviation White Paper.

The purpose of the NASF is to enhance the current and future safety, viability and growth of aviation operations at Australian airports. In particular, it provides guidance on planning requirements for development that may potentially affect aviation operations. This includes building activity around airports.

The NASF consists of nine (9) guidelines:

- Guideline A – Measures for Managing Impacts of Aircraft Noise
- Guideline B – Managing the Risk of Building Generated Windshear and Turbulence at Airports
- Guideline C – Managing the Risk of Wildlife Strikes in the Vicinity of Airports
- Guideline D – Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation
- Guideline E – Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports
- Guideline F – Managing the Risk of Intrusions into the Protected Airspace of Airports
- Guideline G – Protecting Aviation Facilities – Communications, Navigation and Surveillance
- Guideline H – Protecting Strategically Important Helicopter Landing Sites (HLS)
- Guideline I – Managing the Risk in Public Safety Areas at the End of Runways

In assessing the potential aviation impacts, the following airports were identified as requiring assessment by Avlaw.

Airport	Approx. distance to site	Location from the site
Holsworthy (Military)	9.0km	East
Bankstown	12.8km	Northeast
Western Sydney International (WSI)	15.0km	Northwest
Camden	16.7km	Southwest

Table 1: Summary of all airports considered in Avlaw’s assessment

Avlaw have reviewed all the known airport constraints that are in the public domain, which is supplemented with our detailed knowledge of airport operations and approval requirements. The proposed permanent and temporary activities have all been assessed against each of the applicable NASF criteria, the findings from which are summarised in Table 2 below.

NASF Guideline Assessment

Following an analysis of the nine (9) NASF guidelines, Avlaw’s findings are summarised below.

NASF Guidelines	Comments/Response
Guideline A Measures for Managing Impacts of Aircraft Noise.	<i>In this case, the impact shall be nil as the site falls outside the 30 - 35 ANEF contours for all airports.</i>
Guideline B Managing the Risk of Building Generated Windshear and Turbulence at Airports.	<i>In this case, the impact shall be nil as the site falls outside the wind shear assessment area. The windshear assessment area comprises of an area 1,200 m from Runway centreline, 900 m before Runway threshold and 500 m after Runway threshold.</i>

<p>Guideline C</p> <p>Managing the Risk of Wildlife Strikes in the Vicinity of Airports.</p>	<p><i>The site falls within 13 km of two (2) airport boundaries. The planting of trees and grasses that do not attract birds and keeping all waste refuge covered on the sites will trigger a “no action” required.</i></p>
<p>Guideline D</p> <p>Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation.</p>	<p><i>In this case, the impact shall be nil as there is no proposed wind turbines to be erected on site.</i></p>
<p>Guideline E</p> <p>Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports.</p>	<p><i>In this case, the impact shall be nil as the site falls outside the 6 km trigger radius requirement from any aerodrome.</i></p>
<p>Guideline F</p> <p>Managing the Risk of Intrusions into the Protected Airspace of Airports</p>	<p>Permanent Buildings or Structures</p> <p><i>In this case, the finished form of the tallest building is 190.635 m AHD on site 5 which is clear of the OLS associated with WSI.</i></p> <p><i>The outer horizontal surface of the OLS associated with WSI at RL 231.00 m AHD, just clips the western end of Lot 4 (Site 3). Refer to Figure 3 below.</i></p> <p><i>It is noted that the buildings planned on Site 3 has a maximum height of 108.40 m AHD, which is clear and below of the OLS surface.</i></p> <p>Temporary Structures including Constructions cranes</p> <p><i>Any temporary structures such as construction cranes, concrete pumps or scaffolding needs to be considered during the construction phase, in that any penetration of the OLS associated with WSI will require a controlled activity.</i></p> <p><i>The site is located outside the Category C circling area (4.11 nm or 7.62 km) associated with Bankstown Airport, therefore no action required.</i></p> <p><i>The is site below and clear the Radar Terrain Clearance Chart (RTCC) associated with controlled airspace for the greater Sydney region.</i></p> <p>The site is located 9.0 km to the west of Holsworthy Army Aerodrome, which is used predominately for helicopter operations. Consultation with the Department of Defence may be required, and we are of the view that given the distance from the aerodrome, that there will be no impact on Army aviation operations, which is a helicopter base.</p> <p>All buildings/structures over 100 m AGL in height are required to be reported to the Department of Defence for entry into their obstacle data base, regardless of the location/proximity to Defence aerodromes.</p>

<p>Guideline G</p> <p>Protecting Aviation Facilities – Communications, Navigation and Surveillance (CNS).</p>	<p><i>In this case, the impact should be nil</i> as the site is located outside the sensitive and critical areas of any ground-based navigation and landing aids.</p>
<p>Guideline H</p> <p>Protecting Strategically Important Helicopter Landing Sites (HLS).</p>	<p><i>In this case, the impact shall be nil</i> as the nearest Hospital Helipad site (Liverpool Hospital) is outside the referral trigger distance for strategic helicopter landing sites which is set at 3,500 m horizontally. This will need to be reconsidered closer to construction, in the event any new hospitals with helipads are constructed that cannot be considered in this assessment.</p>
<p>Guideline I</p> <p>Managing the Risk in Public Safety Areas (PSA) at the End of Runways.</p>	<p><i>In this case, the impact shall be nil</i> as the site falls outside the published PSA areas for all airports assessed.</p>

Table 2: Summary NASF assessment findings for the site

Key Findings for UPG

In reviewing all the airport constraints at a high level, the most important finding to highlight is that the site is located within and below the outer horizontal surface of the Obstacle Limitation Surface (OLS) for WSI, based on the two (2) runway operations.

Avlaw has produced a model of the WSI OLS, which is inserted at Figure 3 below. The UPG site area depicted in red is based on WSI’s two (2) runway configuration and is located beneath the outer edge of the Outer Horizontal Surface of WSI’s OLS. The ‘light purple’ area is the outer horizontal surface (RL 231.00 m AHD) of the airport’s OLS. The blue areas indicate the site areas clear of the OLS.



Figure 3: Avlaw’s model of the WSI OLS

All buildings are below and clear the WSI's airspace protection surfaces, resulting in no action required for the buildings.

Any construction activity such as construction canes, concrete pumps or scaffolding crane within the area depicted by the red boundary and is higher than RL 231.00 m AHD will trigger a controlled activity assessment. An application seeking controlled activity approval for the OLS penetration during the construction phase of Site 3 will be required to be lodged with WSI once final heights and periods of activity are known.

Given that the second runway is decades away from becoming operational, and the buildings are below and clear of the OLS, this application in our view, will attract no objections from WSI.

RLs provided in this letter are for planning purposes only, and before commencing detailed design, final site contours will need to be obtained to establish reference RLs and final design heights based on AHD.

If you have any questions or require any clarifications, please do not hesitate to contact me.

Kind Regards,

A handwritten signature in blue ink that reads "David Kline". The signature is written in a cursive style with a large initial 'D'.

Airport Operations Specialist & Aviation Auditor