



Lambert Rehbein (VIC) Pty Ltd

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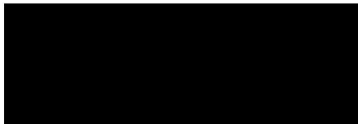
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31 July 2026

Our File Ref: M26105AL001

Contact: [REDACTED]



Attention: [REDACTED]

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RE: **AVIATION IMPACT ASSESSMENT
11/13 INTERNATIONAL SQUARE, TULLAMARINE**

L+R Airport Consulting was engaged by SMA Projects to undertake an aviation assessment of the proposed development at Lot 11/13 International Square, Tullamarine against the National Airports Safeguarding Framework (NASF) Guidelines.

1.0 Proposed Development

The proposed development is a multi-storey residential hotel with car parking, roof plant equipment and a rooftop solar array.

The maximum elevation of the proposed development is the rooftop plant screen at 119.7 m AHD as per Hayball drawing no. 2807/TP05.02/Rev C. For the purposes of this assessment the maximum elevation has been taken to include all rooftop items such as lift overruns, roof access ladders, aerials, antennas, rooftop vegetation or any other protuberances.

Construction equipment has not been provided as part of this assessment. Construction equipment and activities are also a consideration in relation to airport safeguarding refer **Section 4.0**.

2.0 Prescribed Airspace

The proposed development is located within the lateral extents of the Essendon Fields Airport and Melbourne Airport prescribed airspace as described below.

Both Melbourne Airport and Essendon Fields Airport are leased federal airports and, therefore, the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the Department) protects their airspace under Part 12 of the *Airports Act 1996* and the *Airports (Protection of Airspace) Regulations 2026*. Prescribed airspace charts are available on leased federal airports' websites and depict the prescribed airspace applicable to the airport.

2.1 Obstacle Limitation Surfaces (OLS)

2.1.1. Essendon Fields Airport OLS

The proposed development is within the extents of Essendon Fields Airport OLS inner horizontal surface, as illustrated on **Figure M26105/01**. The proposed development at a maximum elevation of 119.7 m AHD would remain below the OLS Inner horizontal surface at 123.5 m AHD.

2.1.2. Melbourne Airport OLS

The proposed development is within the extents of Melbourne Airport's existing and future OLS inner horizontal surface, as illustrated on **Figure M256105/02** and **Figure M256105/03**. The proposed development at a maximum elevation of 119.7 m AHD would remain below the existing and future OLS Inner horizontal surface, both of which are at 157.5 m AHD.

2.2 PANS-OPS Protection Surfaces

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2.2.1. Essendon Fields Airport PANS-OPS

The proposed development is within the lateral extents of the Essendon Fields Airport PANS-OPS. We have assessed the current published procedures (DAP 188 Effective 03 September 2026) and estimate the lowest surface to be the PANS-OPS Circling Cat A/B at 181.3 m AHD.

We have also reviewed the Essendon Fields Airport Prescribed Airspace *Existing PANS-OPS Critical Surfaces* dated 26.04.13 as published on the airport's website. The critical surface over the site is shown as a horizontal plane at 187.5 m AHD.

The proposed development at a maximum elevation of 119.7 m AHD would remain below Essendon Fields Airport PANS-OPS airspace, for which we estimate the lowest protection surface to be the Circling Cat A/B surface at 181.3 m AHD.

2.2.2. Melbourne Airport PANS-OPS

The proposed development is within the extents of Melbourne Airport's existing and future PANS-OPS surfaces. We have assessed lowest surface to be that associated the future PANS-OPS Standard Instrument Departure (SID) Runway 09 shown at a minimum of 170 m AHD as illustrated on **Figure M26105/04**.

The proposed development at a maximum elevation of 119.7 m AHD would remain below this surface estimated at a minimum of 170 m AHD.

2.3 Plume Rise

Plume rise must also be considered in relation to penetration of the OLS and PANS-OPS airspace. Aircraft operations in various stages of flight may be affected by an exhaust plume of significant vertical velocity.

Any plume rise exceeding a velocity of 6.1 m/s at the point of emission in accordance with the *Airports (Protection of Airspace) Regulations 2026* is an activity that results in air turbulence and must not be carried out without approval.

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CASA has published an Advisory Circular *AC 139.E-02 v1.1 Plume Rise Assessments*. The proponent should follow the process set out in this AC to ensure any exhaust plumes that exceed the critical velocities are assessed by CASA.

3.0 National Airports Safeguarding Framework

The National Airports Safeguarding Framework (NASF) is a national land use planning framework that aims to:

- Improve community amenity by minimising aircraft noise-sensitive developments near airports including through the use of additional noise metrics and improved noise-disclosure mechanisms; and
- Improve safety outcomes by ensuring aviation safety requirements are recognised in land use planning decisions through guidelines being adopted by jurisdictions on various safety related issues.

All Guidelines can be found at www.infrastructure.gov.au.

NASF currently consists of a set of nine (9) guidelines, as below. Each has been summarised in relation to the proposed development.

3.1 Guideline A: Measures for Impacts of Aircraft Noise

NASF Guideline A can be used in the assessment of new development applications for noise-sensitive uses.

The proposed development is outside the Essendon Fields Airport Master Plan 2013 ANEF 2033 contours, as shown on **Figure 1** below.

The proposed development is also outside the Melbourne Airport Master Plan 2022 Long Range ANEF, as shown on **Figure 2** below.

The Australian Standard AS2021-2015 provides building type acceptability based on ANEF zones. AS2021-2015 determines 'Hotel, motel hostel' to be 'Acceptable' in ANEF less than 25 ANEF.

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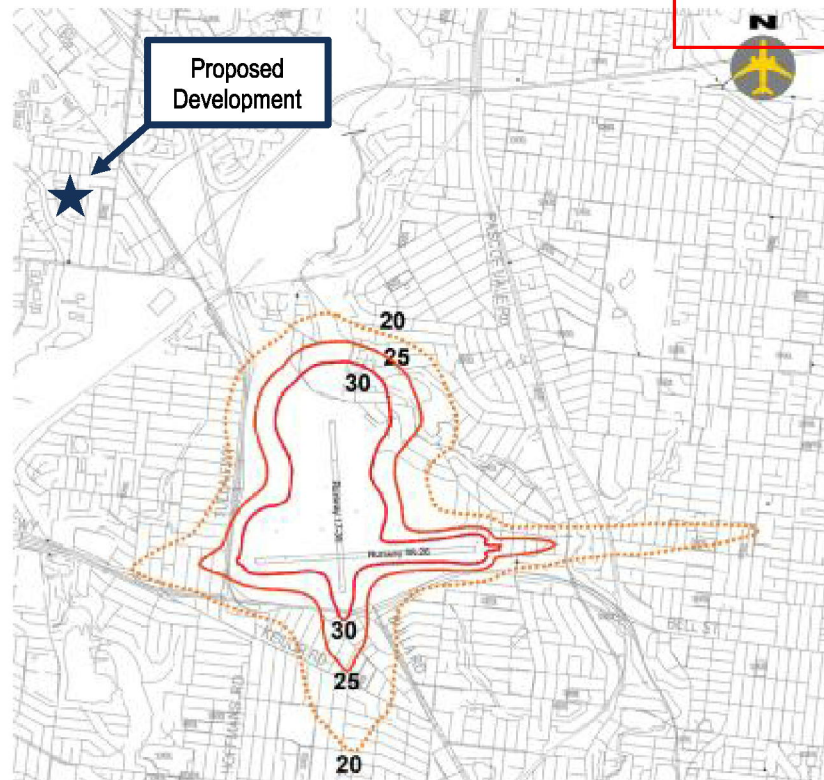
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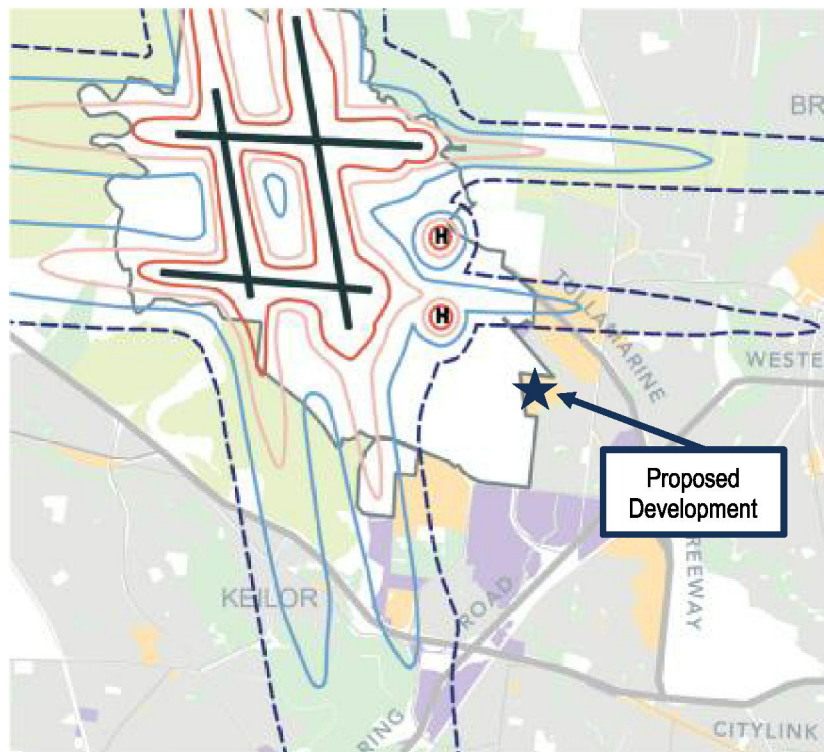
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Figure 1: Essendon Fields Airport ANEF 2033



Source: Essendon Airport Master Plan 2013 Figure 8.1 Australia Noise Exposure Forecast (2033)

Figure 2: Melbourne Airport Long-Range ANEF



Source: Melbourne Airport Master Plan 2022 Figure 15-31 Master Plan 2022 Long Range ANEF for Melbourne Airport

3.2 Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports

The purpose of this guideline is to assist land use planners and airport operators in their planning and development processes to reduce the risk of building-generated windshear and turbulence at airports near runways.

Applicability of Guideline B is initially determined by the location of the building within an assessment trigger area around the runway ends, that is:

- 1,200 metres or closer perpendicular from the runway centreline (or extended runway centreline);
- 900 metres or closer in front of runway threshold (towards the landside of the airport); and
- 500 metres or closer from the runway threshold along the runway.

The proposed development is beyond the assessment triggers areas, for Melbourne Airport existing and future runways (approximately 2.5 km from the runway end) and Essendon Fields Airport runways (approximately 3.5 km from the runway end).

Therefore, in accordance with Guideline B no further assessment is required.

3.3 Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports

The purpose of Guideline C is to inform land use planning decisions and the way in which existing land use is managed in the vicinity of airports with respect to the attraction of wildlife, particularly birds. Guideline C establishes wildlife management areas of 3 km, 8 km and 13 km from the Aerodrome Reference Point (ARP). For Melbourne Airport, due to the surrounding land uses that are attractive to wildlife, the wildlife management areas are measured from the end of each runway rather than from the ARP.

The proposed development is approximately 4.4 km from Essendon Fields Airport ARP, located within Wildlife Management Area B (3 km – 8 km) of Essendon Fields Airport.

The proposed development is approximately 2.5 km from the Melbourne Airport runway end, located within the Wildlife Management Area A (0-3 km) of Melbourne Airport.

Guideline C Attachment 1 *Wildlife Hazard Management Action Table* identifies:

- Land use types that may attract wildlife.
- The wildlife attractant risk of each land use type.
- The most likely elements of each land use type that can attract wildlife.
- Actions to be undertaken for land use types within wildlife management areas.

The *Wildlife Hazard Management Action Table* identifies 'Hotel/Motel' as 'very low' wildlife attraction risk and for new and changed developments within Area A (0 to 3 km) for Melbourne Airport, the action is to 'monitor'. Within Area B (3 to 8 km) for Essendon Fields Airport, there is no action required.

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As per Guideline C, where 'monitor' is indicated, information regarding approved development should be provided to Melbourne Airport for their information and included in future monitoring activities undertaken by that operator where appropriate. Melbourne Airport can be contacted via airspaceprotection@melair.com.au.

3.4 Guideline D: Managing the Risk to Aviation Safety of Wind Turbine Installations (Wind Farms)/Wind Monitoring Towers

This Guideline provides general information and advice in relation to wind farms and turbines and their hazards to aviation. Guideline D is not relevant to the proposed development as provided.

3.5 Guideline E: Managing the Risk of Distraction to Pilots from Lighting in the Vicinity of Airports

NASF Guideline E provides guidance on the risk of distractions to pilots of aircraft from lighting and light fixtures near airports. The CASA *Part 139 (Aerodromes) Manual of Standards 2019* Section 9.144: *Lights – requirements for zones* sets out the restrictions and the degree of interference ground lights may acceptably cause as a pilot approaches and provides advice to lighting suppliers on the general requirements for lighting within a 6 km radius of a known aerodrome.

The CASA Part 139 (Aerodromes) Manual of Standards 2019, Section 9.144: *Lights – requirements for zones*, sets out the restrictions and the degree of interference ground lights can cause as a pilot approaches, and provides advice to lighting suppliers on the general requirements. The primary area is divided into four light control zones: A, B, C and D. These zones reflect the degree of interference ground lights can cause pilots as they approach.

The proposed development is outside the primary area and within the 6 km radius for both airports, as illustrated on **Figure M26105/05** and **Figure M26105/06**.

The Civil Aviation Safety Authority (CASA) has powers under the Civil Aviation Act 1988 to regulate potential sources of distractions from lighting. Lights within a 6 km radius of the airport are subject to the provisions of Regulation 94 of the Civil Aviation Regulations 1988 (CAR 1988), under which CASA can require lights that may cause confusion, distraction or glare to pilots in the air to be extinguished or modified.

Glare caused by reflective surfaces may also be a source of distraction to pilots. It should be noted that the solar panel array proposed is a particular consideration in relation to glare/reflectivity affecting aircraft in various stages of flight, as well as ATC operations.

As the proposed development is outside the primary area, we would not expect the installation to cause concern; however, the proponent should confirm with Melbourne Airport and Essendon Fields Airport if a solar glare hazard analysis will be required to satisfy Essendon Fields Airport, Melbourne Airport and CASA and/or Airservices Australia that the safety of aircraft and ATC operations will not be affected.

Melbourne Airport can be contacted via airspaceprotection@melair.com.au and Essendon Fields Airport via aviation@ef.com.au.

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3.6 Guideline F: Managing the Risk of Intrusions into Protected Airspace of Airports

Guideline F is intended to address the issue of intrusions into the operational airspace of airports by tall structures, such as buildings and cranes in the vicinity of airports.

The Guideline also addresses activities that could cause air turbulence that could affect the normal flight of aircraft operating in the prescribed airspace and/or emissions of steam, other gas, smoke, dust or other particulate matter that could affect the prescribed airspace in accordance with Visual Flight Rules (VFR).

This Guideline has been considered for the proposed development throughout **Section 2.0** of this assessment. Potential impacts during construction are discussed in **Section 4.0**.

3.7 Guideline G: Protecting Aviation Facilities – Communication, Navigation and Surveillance (CNS)

The purpose of Guideline G is to formalise the protection of CNS facilities in land use planning decisions. This Guideline provides land use planning guidance to better protect CNS facilities which support the system and processes in place by various agencies to safely manage the flow of aircraft into, out of and across Australian airspace. The Guideline also informs procedures which ensure development associated activities within Building Restricted Areas (BRA) of CNS facilities do not adversely affect the facility or cause interference for air traffic controllers or aircraft in transit.

The proposed development is not located within the vicinity of the building restricted areas of Melbourne Airport and Essendon Fields Airport CNS facilities.

3.8 Guideline H: Protecting Strategically Important Helicopter Landing Sites (HLS)

Guideline H provides guidance to State/Territory and local government decision makers as well as the owners/operators of identified strategically important Helicopter Landing Sites (SHLS) for the ongoing operations and to ensure SHLS are not compromised by any proposed development. For the purposes of this Guideline, an SHLS is an area not located on an aerodrome.

In Victoria, many of the hospital helipads and associated flight paths are protected under the relevant planning schemes with design and development overlays (DDOs) and specific controls overlays (SCOs). The closest hospitals to the development with published DDOs / SCOs for helipad flight path protection within the relevant planning schemes are the Royal Melbourne Hospital, Royal Children's Hospital and the Alfred Hospital. The proposed development is not within 3.5 km of these hospitals.

3.9 Guideline I: Managing the Risk in Public Safety Areas at the Ends of Runways

Guideline I is intended to provide guidance to Australian Government, state, territory and local government decision makers on the assessment and treatment of potential increases in risk to public safety which could result from an aircraft incident or development proposal in areas near

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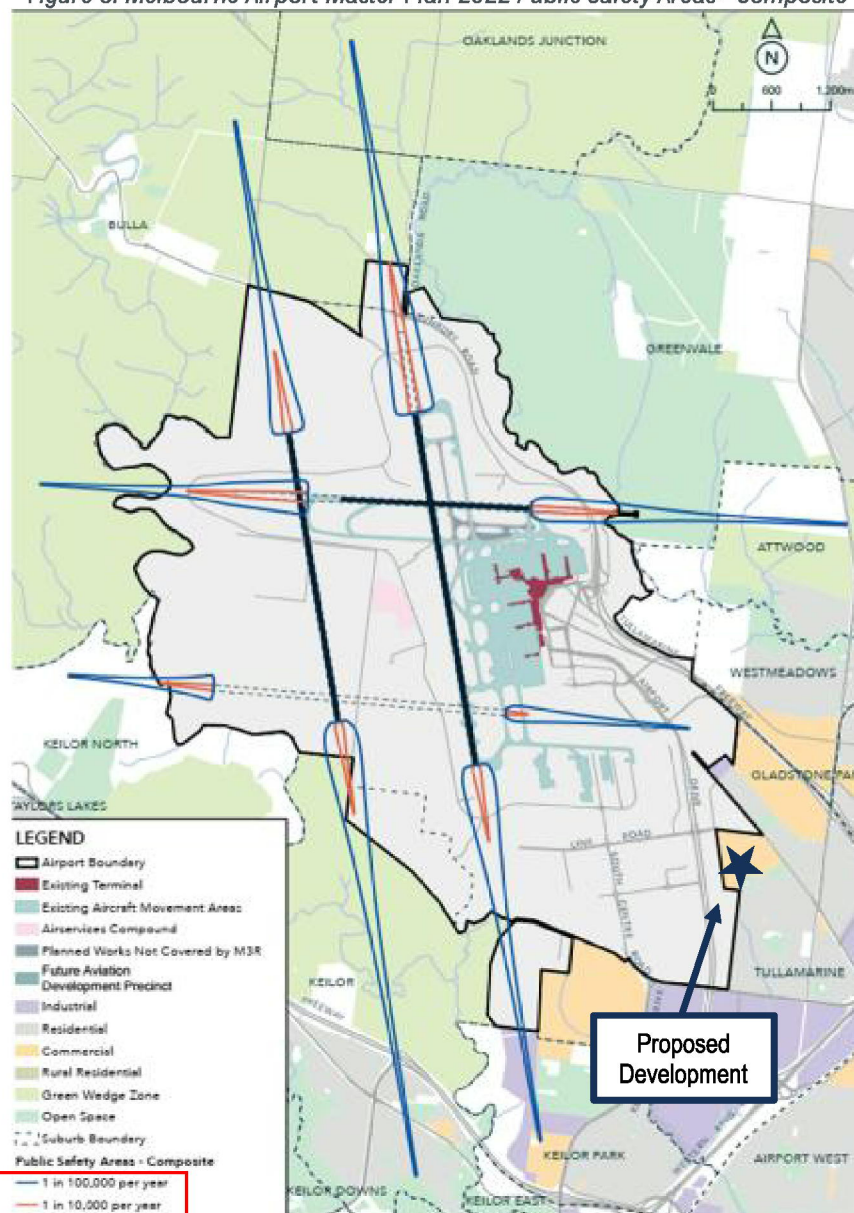
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the end of an airport runway. The intention is to ensure there is no increase in risk from new development and assist land-use planners to better consider public safety when assessing development proposal, rezoning requests and when developing strategic land use plans.

Essendon Fields Airport Master Plan 2013 does not include Public Safety Areas (PSAs). As per Guideline I the Queensland model PSA template can be used as a reference. The Queensland PSA model forms the shape of an isosceles trapezoid, 1,000 m long, 350 m wide closest to the runway end, tapering to a width of 250 m furthest from the runway. The proposed development is outside the extents of the Queensland model PSAs for Essendon Fields Airport.

The proposed development is also outside the Melbourne Airport Master Plan 2022 Public Safety Areas – Composite as shown below on **Figure 3**.

Figure 3: Melbourne Airport Master Plan 2022 Public Safety Areas - Composite



Source: Melbourne Airport Master Plan 2022

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4.0 Construction Impacts

During construction, the construction sequencing and methodology must be considered in relation to the OLS and PANS-OPS surfaces.

The critical airspace limit over the site is the Essendon Fields Airport OLS inner horizontal at 123.5 m AHD, followed by the Melbourne Airport existing and future OLS inner horizontal at 157.5 m AHD. The OLS inner horizontal surface is a 'secondary surface' under the *Airports (Protection of Airspace) Regulations 2026* (APARs).

Above the OLS are PANS-OPS protection areas that begin at approximately 170 m AHD. PANS-OPS protection areas are 'primary surfaces' under the APARs and infringements of primary surfaces require approval from the airport to apply.

As discussed with SMA Projects on 2 July 2026, it is likely that crane activity will be required to infringe the OLS but will remain below the PANS-OPS. This scenario constitutes an infringement of a 'secondary surface' under the APARs and an application will need to be made in writing to the airport/s whose OLS is infringed for approval to carry out a controlled activity.

The process and application forms are available for Essendon Fields Airport at <https://ef.com.au/airport/airspace-protection/> and Melbourne Airport at <https://www.melbourneairport.com.au/corporate/airspace-protection?srltid=AfmBOoolCEl5ucpxlJAizVSTgiEjXsyOc1GlytOOflfYl5Oxlqjamp8v>

5.0 Conclusion

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L+R Airport Consulting has completed an aviation impact assessment of the proposed development at Lot 11/13 International Square, Tullamarine. The assessment is summarised as follows for the proposed development at a maximum elevation of 119.7 m AHD.

- The proposed development would remain below:
 - the Essendon Fields Airport OLS inner horizontal surface at 123.5 m AHD;
 - the Melbourne Airport existing and future OLS inner horizontal surface at 157.5 m AHD;
 - the Essendon Fields Airport PANS-OPS Circling Category A/B surface estimated at 181.3 m AHD; and the
 - Melbourne Airport lowest PANS-OPS surface SID Runway 09 surface estimated above 170m AHD;
- Outside the extents of the Essendon Fields Airport Master Plan 2013 ANEF 2033 and Melbourne Airport Master Plan 2022 Long Range ANEF;
- Outside the extents of the windshear and turbulence assessment trigger areas for Essendon Fields Airport and Melbourne Airport. As per NASF Guideline B, no further assessment is required;
- Within wildlife management Area B for Essendon Fields Airport and wildlife management Area A for Melbourne Airport. As per Guideline C Attachment 1 'Hotel/Motel' land use has 'very low' wildlife attraction risk. For Area A (Melbourne Airport) the action is to 'monitor' and for Area B there is 'no action' in accordance with Guideline C;

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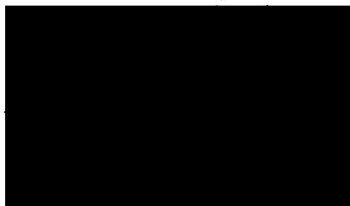
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- Within the 6 km radius of both airports. Lights are therefore subject to Regulation 94 of the Civil Aviation Regulations 1988 (CAR 1988), under which CASA can require lights that may cause confusion, distraction or glare to pilots in the air to be extinguished or modified;
- Outside the building restricted areas for published CNS facilities at both airports;
- Not within 3.5 km of a hospital site;
- Outside the extents of Public Safety Areas associated with Essendon Fields Airport and Melbourne Airport;
- Construction sequencing and methodology must be considered in relation to the OLS and PANS-OPS surfaces. The critical surface over the site is the Essendon Fields Airport OLS inner horizontal is 123.5 m AHD followed by the Melbourne Airport existing and future OLS inner horizontal at 157.5 m AHD; and
- Penetrations of prescribed airspace by cranes during construction will constitute a controlled activity under the *Airports (Protection of Airspace) Regulations 2026*. Process and application forms are available via Essendon Fields Airport and Melbourne Airport websites.

For further information in relation to the above, please contact the undersigned.

Yours faithfully,
For and on behalf of
Lambert Rehbein (VIC) PTY LTD

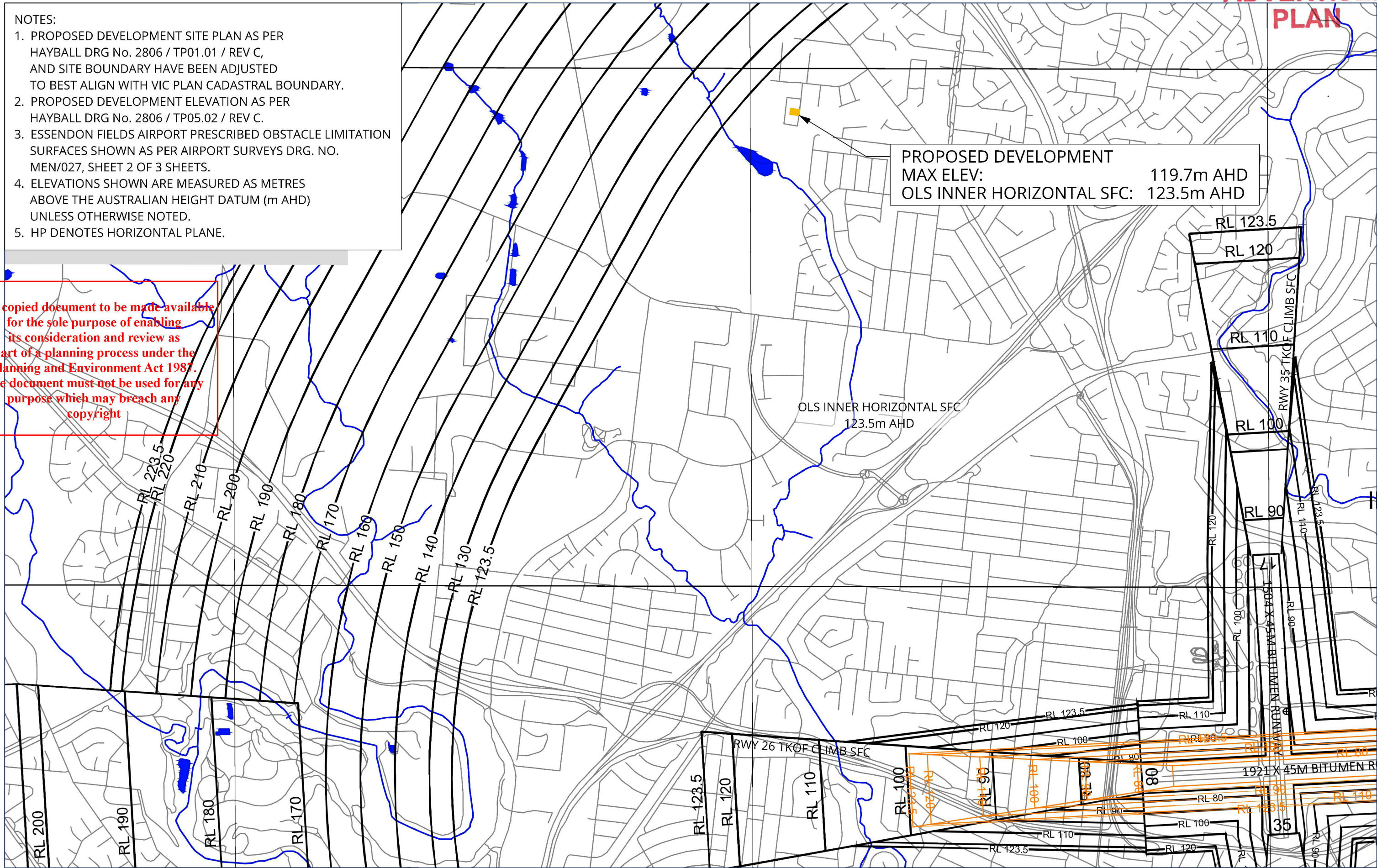


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Figures M26105/01 - 06

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- NOTES:
1. PROPOSED DEVELOPMENT SITE PLAN AS PER HAYBALL DRG No. 2806 / TP01.01 / REV C, AND SITE BOUNDARY HAVE BEEN ADJUSTED TO BEST ALIGN WITH VIC PLAN CADASTRAL BOUNDARY.
 2. PROPOSED DEVELOPMENT ELEVATION AS PER HAYBALL DRG No. 2806 / TP05.02 / REV C.
 3. ESSENDON FIELDS AIRPORT PRESCRIBED OBSTACLE LIMITATION SURFACES SHOWN AS PER AIRPORT SURVEYS DRG. NO. MEN/027, SHEET 2 OF 3 SHEETS.
 4. ELEVATIONS SHOWN ARE MEASURED AS METRES ABOVE THE AUSTRALIAN HEIGHT DATUM (m AHD) UNLESS OTHERWISE NOTED.
 5. HP DENOTES HORIZONTAL PLANE.

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2. PROPOSED DEVELOPMENT ELEVATION AS PER HAYBALL DRG No. 2806 / TP05.02 / REV C.
3. MELBOURNE AIRPORT EXISTING OBSTACLE LIMITATION SURFACES AS PER MELBOURNE AIRPORT PRESCRIBED AIRSPACE CHART - EXISTING RUNWAYS OBSTACLE LIMITATION SURFACE (OLS).
4. ELEVATIONS SHOWN ARE MEASURED AS METRES ABOVE THE AUSTRALIAN HEIGHT DATUM (m AHD) UNLESS OTHERWISE NOTED.
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 2. PROPOSED DEVELOPMENT ELEVATION AS PER HAYBALL DRG No. 2806 / TP05.02 / REV C.
 3. MELBOURNE AIRPORT PRESCRIBED FUTURE OBSTACLE LIMITATION SURFACES AS PER MELBOURNE AIRPORT DRG No. EN7306 REV 001.
 4. ELEVATIONS SHOWN ARE MEASURED AS METRES ABOVE THE AUSTRALIAN HEIGHT DATUM (m AHD) UNLESS OTHERWISE NOTED.
 5. HP DENOTES HORIZONTAL PLANE.



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SMA PROJECTS

AVIATION IMPACT ASSESSMENT – 11/13 INTERNATIONAL SQUARE, TULLAMARINE

MELBOURNE AIRPORT FUTURE RUNWAYS - OBSTACLE LIMITATION SURFACE

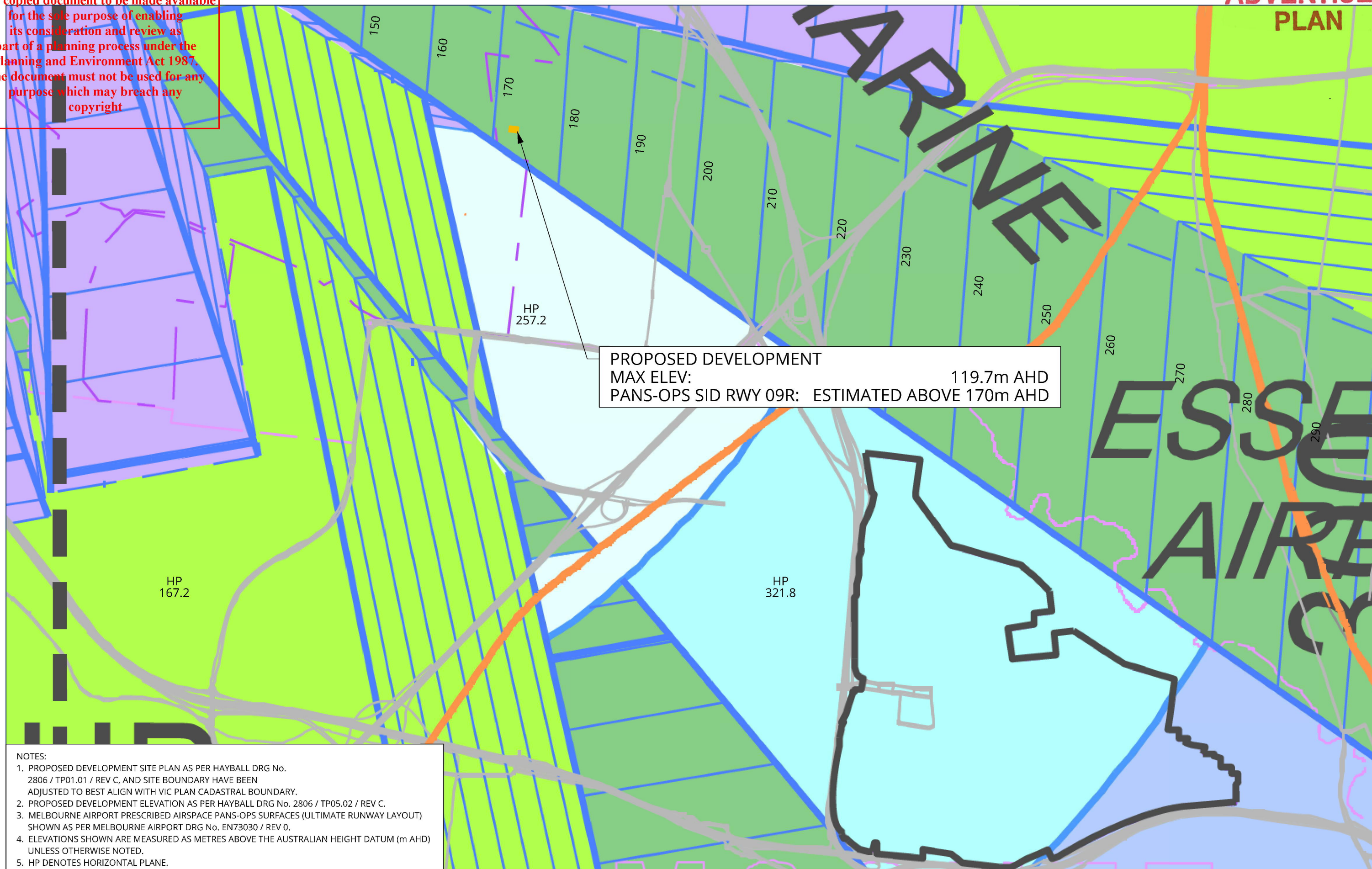


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FIGURE:
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2. PROPOSED DEVELOPMENT ELEVATION AS PER HAYBALL DRG No. 2806 / TP05.02 / REV C.
3. MELBOURNE AIRPORT PRESCRIBED AIRSPACE PANS-OPS SURFACES (ULTIMATE RUNWAY LAYOUT) SHOWN AS PER MELBOURNE AIRPORT DRG No. EN73030 / REV 0.
4. ELEVATIONS SHOWN ARE MEASURED AS METRES ABOVE THE AUSTRALIAN HEIGHT DATUM (m AHD) UNLESS OTHERWISE NOTED.
5. HP DENOTES HORIZONTAL PLANE.



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SMA PROJECTS

AVIATION IMPACT ASSESSMENT - 11/13 INTERNATIONAL SQUARE, TULLAMARINE

MELBOURNE AIRPORT FUTURE PRESCRIBED AIRSPACE PANS-OPS



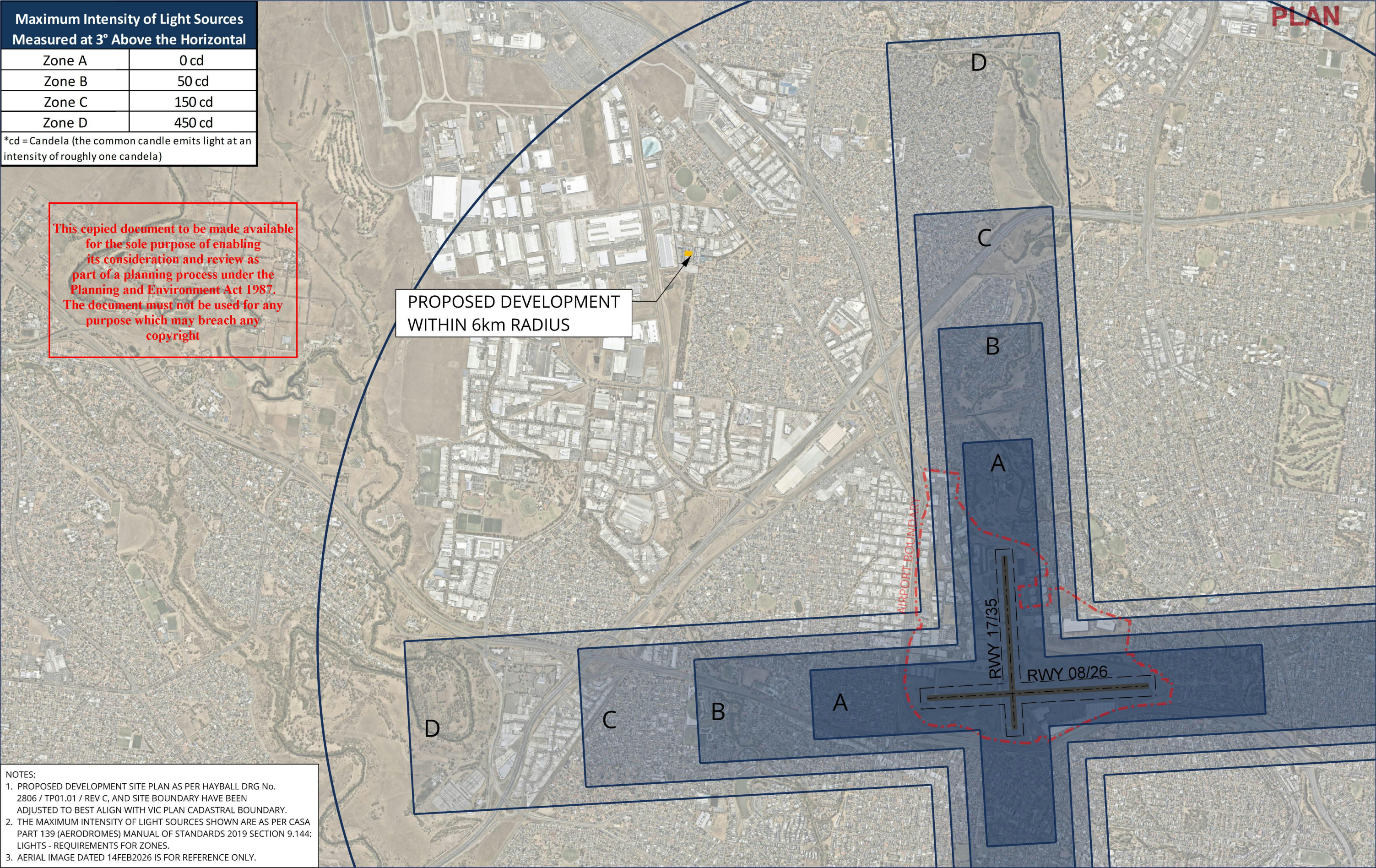
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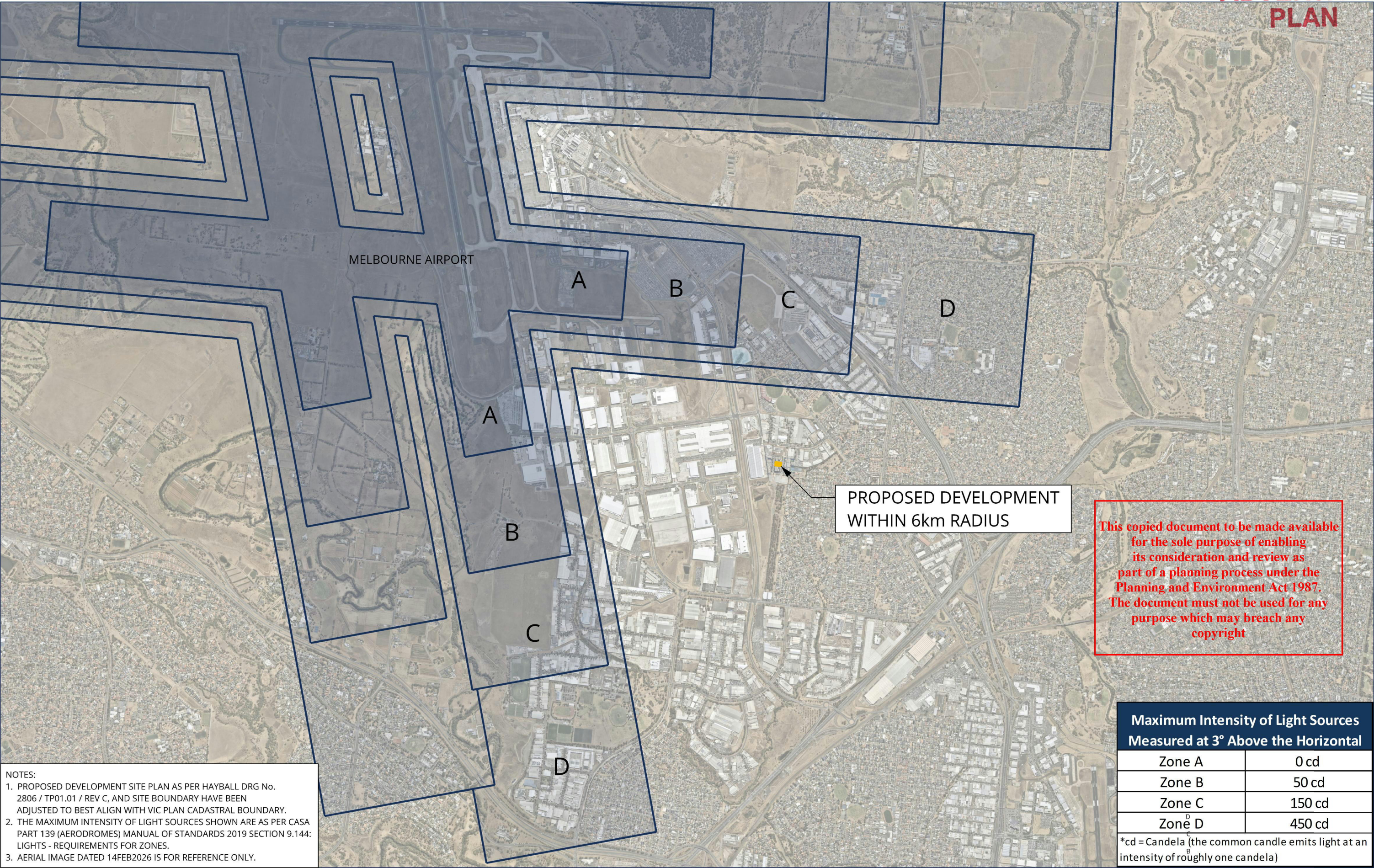
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Maximum Intensity of Light Sources Measured at 3° Above the Horizontal	
Zone A	0 cd
Zone B	50 cd
Zone C	150 cd
Zone D	450 cd
*cd = Candela (the common candle emits light at an intensity of roughly one candela)	

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 2. THE MAXIMUM INTENSITY OF LIGHT SOURCES SHOWN ARE AS PER CASA PART 139 (AERODROMES) MANUAL OF STANDARDS 2019 SECTION 9.144: LIGHTS - REQUIREMENTS FOR ZONES.
 3. AERIAL IMAGE DATED 14FEB2026 IS FOR REFERENCE ONLY.



NOTES:
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