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Urbis Pty Ltd
ABN 50 105 256 228

6 July 2022

Ms Casey Joshua
Principal Case Manager
Office of Independent Planning Commission NSW
Suite 15.02 Level 15, 135 King Street
Sydney NSW 2011

CC: Commissioner Chris Wilson – Chair of Panel
Sheridan Coakes – Panel Member

Dear Ms Joshua,

DA21/15298: HELIPAD PENRITH LAKES | 100 OLD CASTLEREAGH ROAD, CASTLEREAGH

The following correspondence has been prepared by Urbis Pty Ltd on behalf of Sydney Helicopters Group (the Applicant) in relation to the assessment of DA21/15298, for the proposed helipad at the Penrith Lakes which is currently under assessment by the NSW Independent Planning Commission (IPC).

Following the public meeting held by the IPC on the 30 June 2022, the Applicant wishes to take the opportunity to provide additional information to the IPC for consideration as part of their determination, noting that the opportunity for submissions remains open to the public until the 8 July 2022.

During the course of the recent public meeting it was noted that the IPC sought additional information in relation to the existing operational procedure of the Applicants previous facility at 25 Wentworth Street, Clyde, this submission also acts as an opportunity to address several of the points raised by speakers at the public meeting.

Noting the above, this letter is seeking to provide additional information in relation to the following:

- The proposals appropriate categorisation as a “helipad”;
- Acoustic impacts;
- Hours of operation; and
- Contamination.

To support each of these points, the following information is submitted as appendices to this letter:

- **Appendix A:** Advice regarding development application for a helipad at 89-151 Old Castlereagh Road, Castlereagh NSW 2749, by Norton Rose Fulbright, 5 July 2022;
- **Appendix B:** Penrith Helicopter Relocation - Responses to Independent Planning Commission, by Acoustic Logic, 6 July 2022; and
- **Appendix C:** Harrold, S. (2022) Email to Vozzo, S, 4 July 2022.



With regard to **Appendix A** and **B** above, we note these appendices can be read in isolation to provide the additional information. Please note that additional information pertaining to **Appendix C** is further discussed below.

HOURS OF OPERATION

A key matter raised within the public meeting was in relation to the proposed hours of operation for non-emergency flights. It is noted that the application had originally sought operation from 'first light', however by the time a recommendation was provided by the DPE on the application, a draft condition for operating hours between 6.00am to 10.00pm Monday to Sundays was put forward.

The Applicant has considered this draft condition and proposes that it is open to accepting a condition limiting the hours of operation to between 7.00am to 10.00pm Monday to Sundays for non-emergency flights. Sydney Helicopters recognises the value in minimising impact to sleep disturbance from the helipad, noting that 'night-time' hours are between 10.00pm to 7.00am. Please note additional information on this reasoning is provided within **Appendix B**.

CONTAMINATION

The Preliminary Site Investigation (PSI) prepared by Douglas Partners that was submitted with the Environmental Impact Statement (EIS) for the application as Appendix J undertook a thorough investigation of the subject site to arrive at the report's findings. The investigation included a desktop review of site history, a site walkover, development of a preliminary conceptual site model, intrusive soil sampling from 34 test pits that were placed across the larger site, laboratory analysis for contaminants of potential concern and interpretation of results with reference to current NSW EPA endorsed guidelines.

The PSI's investigation concluded that no identified indicators of widespread contamination existed at the site. The only concern arising from the findings of the PSI was that reduced sampling density of the investigations undertaken in the vicinity of underground tanks on site that had been identified within the SafeWork NSW records. The PSI thereby determined that the potential for unidentified contamination pockets could not be completely ruled out, and thereby a detailed site investigation (DSI) was recommended.

Since acquiring the site, the Applicant has found no evidence of tanks having been previously installed on site. This is reflected in the site survey that was undertaken and submitted as Appendix A to the EIS. To further confirm this, the Applicant has recently corresponded with the CEO of the former land owner, the Penrith Lakes Development Corporation (PLDC), to confirm that no underground tanks were installed on site. This is despite a license for a 3000L underground petrol storage tank being renewed in 2006, and records suggesting two other underground tanks that may have been installed in 1964.

This correspondence is submitted as **Appendix C** to this letter.

Noting the concurrence from the PLDC and the submitted site survey both suggesting no evidence of the tanks being installed on site, it can be considered that the potential risk for unidentified contamination pockets is not a concern with regard to site contamination, and that the findings of the PSI, that the site has not been identified as containing any evidence of widespread contamination is evidently correct.

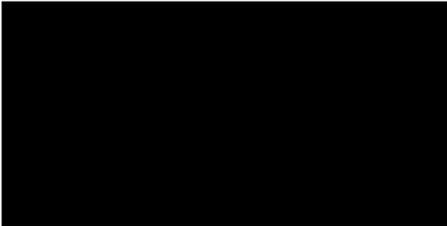


We trust that the above information and those within the appendices to this letter will be of assistance to the IPC in their determination of DA21/15298 for the proposed helipad at the Penrith Lakes.

Furthermore, we acknowledge the complexities of this application and advise that should the IPC require any additional information from the project team, we encourage the IPC to not hesitate to reach out and request from the relevant members of the project team.

Similarly, should you wish to discuss any aspect of the information as detailed within this letter and it's accompanying appendices, please do not hesitate to reach out to myself at the undersigned, or my colleague John Booth on ([REDACTED])

Kind regards,



John Wynne
Director





APPENDIX A

ADVICE REGARDING DEVELOPMENT APPLICATION FOR A HELIPAD AT 89- 151 OLD CASTLEREAGH ROAD, CASTLEREAGH – NORTON ROSE FULBRIGHT

5 July 2022

Mr Mark Harrold
Heliport Developers Pty Limited
89-151 Old Castlereagh Road
Castlereagh NSW 2749

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Level 5, 60 Martin Place
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[REDACTED]

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Your reference:

Our reference:

4043057

Dear Mark

Advice regarding development application for a helipad at 89-151 Old Castlereagh Road, Castlereagh NSW 2749 (the Property)

Introduction

- 1 You have sought advice in relation to the oral and written submissions made by Blue Mountains City Council (BMCC) in relation to your development application for the construction and use of a helipad at the Property.
- 2 In this regard, the arguments raised by BMCC require a considered response as they raise a number of legal and factual issues.
- 3 In this letter, we also refer to our earlier advice of 5 October 2021, a copy of which was included in the development application and to which BMCC refer in its submissions.
- 4 We address the key issues raised by BMCC under the following headings.

Permissibility

- 5 BMCC provided to the IPC a written submission dated 3 December 2021 which asserted that the proposed use is properly characterised as a heliport instead of a helipad.
- 6 This argument was reiterated in a private meeting with the IPC on 20 June 2022. However, the transcript of that meeting shows that the BMCC did not raise additional arguments beyond those raised in the written submission. The argument was again raised in the public meeting held on 29 June 2022.

APAC-#302146651-v1

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- 7 The written submission commences by reference to various statements in the EIS. It then argues that those statements support the proposition that the proposed development is a heliport rather than a helipad.
- 8 The BMCC written submission is, with respect, perfunctory in that it takes selective sentences in the EIS and suggests they are evidence that the proposed facility is 'open to the public' and therefore the proposed development is actually a heliport rather than a helipad.
- 9 In our view, the BMCC written submission completely misstates the nature of the proposed development. Indeed, the submission fails to consider the detailed description of the operation of the proposed development set out in section 3.2 of the EIS (at page 32). In that section of the EIS, it is stated as follows:

To ensure compliance with the definition of helipad under the *Standard Instrument—Principal Local Environmental Plan (2006 EPI 155a)*, the proposed helipad will operate with the following characteristics:

- The proposed development is only for the business operations of Sydney Helicopters.
- Security measures on site, including locked access which can only be opened by the operators, prevent unauthorised access to the site.
- Operations from the site do not include regular helicopter flights to or from a set destination which any member of the public can seek to enter the premises, purchase a ticket, or board a flight.
- Only helicopters operated by Sydney Helicopters will be taking off and landing on the site.
- The public is not allowed or entitled to enter the site without being invited to do so by Sydney Helicopters.
- No other helicopter operator is permitted to access the site unless in an emergency.
- The proposed operation of the site does not involve: (i) the provision of facilities for the hire of helicopters by others, (ii) the provision of facilities for the landing, refuelling and take off of helicopters by others, and (iii) general access by the public to the facility for the use and enjoyment by the public.

- 10 We discussed in detail in our advice of 5 October 2021 the key legal difference between a helipad and heliport is whether or not the place is open to the public. This key factor was confirmed by Preston CJ in the case of *Nessdee Pty Limited v Orange City Council [2017] NSWLEC 158*.
- 11 This key principle does not appear to be disputed in the BMCC submission. The submissions also does not take issue with what the criteria set out in the authorities we cited as to what the phrase means in practice.
- 12 In our advice on 5 October 2021, we noted the following facts strongly indicated that the proposed facility was not 'open to the public':
- (1) The Proposed Development is only being used by you for your own business.
 - (2) Your helicopter business involves a number of income earning activities including:
 - (a) Provision of emergency services including flood and emergency relief;
 - (b) Provision of fire support services; and
 - (c) Provision of other services to customers such as transport, aerial photography and survey, joy flights, tourism flights and other services.
 - (3) There are significant security measures proposed to be installed to prevent unauthorised entry into your premises.

- (4) You will not be operating regular helicopter flights to or from a set destination which any member of the public can seek to enter your premises, buy a ticket, and board the flight.
- (5) Only your helicopters will be taking off and landing at the Property.
- (6) The public will not be allowed or entitled to enter the premises without being invited to do so by your business.
- (7) No other operator of helicopters will be allowed to access the Property (unless in an emergency).
- 13 All of the above factors strongly indicate the premises will not be 'open to the public'. As we noted in our 5 October 2021 advice, only those who are invited into the facility can enter it. The public will not have a right to enter the facility and request a joy flight or other services.
- 14 We note that during the public hearing, a spokesperson for BMCC stated:
- Adopting the wording of the applicant's legal advice, the applicant's proposed facility on the property is intended to be one, and I quote, "which the public may access and use for air transport purposes." As proposed, and again I quote, "the general public will be able to enter and use the facility." (see para 30 at 9-25 of the Transcript)
- 15 This statement is not correct. Nowhere in our advice of 5 October 2021 did we state the above. Indeed, we argued the opposite.
- 16 The BMCC submission in the public hearing refers to a decision of the Full Court of the Supreme Court of South Australia in *Zarella Holdings Pty Ltd & Anor v Williams and Anor* [2012] SASCFC 100.
- 17 That case concerned whether a loading bay on private land was "open to the public and used by the public".
- 18 The first point to observe is that the composite phrase "open to or used by the public" that considered in *Zarella* and other road or traffic related cases is broader than the phrase 'open to the public' which is referred to in the definition of a helipad and heliport in the Standard Instrument.
- 19 That said, after reviewing previous decisions, the Court in *Zarella* found that where the following facts exist, it suggests the relevant premises is not 'open to the public':
- (1) there is no general right or express licence for the public to enter and visit the premises;
- (2) there are physical barriers in place (ie security provisions) to prevent access to the premises;
- (3) the only persons who are allowed on the facility are those expressly invited and have a specific reason to be on the premises.
- 20 Applying these principles, the Full Court found the loading bay was not open to the public and used by the public. The key factual reason was explained by Kourakis CJ and Blue J at [56]:
- "...permission was only granted to invitees on an individual basis who had established their specific reason for doing business with Zerella. Legal access was not available to members of the public at all."
- 21 Thus when one properly examines *Zarella*, rather than supporting the position of BMCC, the decision confirms our view the Sydney Helicopters proposed facility will not be open to the public.
- 22 The BMCC submissions also rely on a number of other arguments to which we respond as follows.
- The former business and the new business*
- 23 Another argument relied upon by BMCC is that Sydney Helicopter is simply re-establishing its former business that operated at Granville which was heliport to the new facility and therefore it will be a heliport rather than a helipad. There are two answers to this.

- 24 First, it is contrary to section 4.15 of the *Environmental Planning and Assessment Act 1979* to have regard in the assessment of a proposed development, the nature of a former development carried on at another location in a completely different local government area. It is simply irrelevant.
- 25 Indeed to have regard to the Granville operation at all would be to have regard to an irrelevant consideration and expose a decision to legal challenge.
- 26 The second point is that this proposition ignores the facts. The business formerly operated at Granville will not be the same business at the new facility. Key aspects of the business will not be carried out at the new facility under a consent granted for a helipad, including:
- (1) Providing services to other helicopter operators such as providing landing and take-off services;
 - (2) Providing helicopter maintenance services to other helicopter operators;
 - (3) Providing communications and other air traffic control services to any helicopter operator who wished to use the facility; and
 - (4) Allowing the public as of right to enter the facility (there being no fence or other security preventing access) and seek the use of services;
- 27 This is not considered at all in the BMCC submissions.

Tourism services

- 28 The second argument referred to in the BMCC submissions suggests the proposed provision of tourism services by the proponent suggest it will be open to the public and is thus a heliport. Two points need to be made concerning this argument.
- 29 First, it is correct that approximately 20% of the proposed flights at the facility will involve scenic or tourism related flights. Indeed, such activities are consistent with the zoning of the land as Tourism under the *State Environmental Planning Policy (Penrith Lakes Scheme) 1989 (SEPP)*.
- 30 However, to contend that merely because some of proposed activities involve tourism, that makes the development a heliport is to ignore the key point in the statutory definitions identified by Preston CJ in *Nessdee*. To constitute a heliport, the proposed development must be 'open to the public'.
- 31 In other words, even if tourism flights occur, that of itself does not establish it is open to the public. The public must have a general right or express licence to enter the premise. That is not occurring at the proposed facility.
- 32 Second, the argument ignores statements in the EIS that indicate the majority of the proposed helicopter flights (some 80%) will not be for scenic or tourist purposes. The vast bulk will involve the provision of specific services by the proponent to government and private entities. The public cannot simply arrive at the facility, enter it as of right, and require the provision of services for tourism purposes.
- 33 Again the facts strongly point to the conclusion the site will not be open to the public as a general right.

Relevance of other helicopter operators

- 34 In the meeting between the BMCC and the IPC, it was suggested by BMCC that the impacts of the proposed development may be similar to those of other operators who operate in the Blue Mountains region. A particular concern was that flights could adversely impact the values of the Blue Mountains World Heritage Area.

- 35 This submission again ignores key facts. As stated in section 1.4 of the EIS, the business of Sydney Helicopters is dominated by the provision of charter services and other government related services to the RFS, SES and energy and water utilities.
- 36 The flight data provided to the IPC on 27 June 2022 demonstrates that only a tiny fraction of flights go over the Blue Mountains. For example, and notwithstanding the fact that Sydney Helicopters is permitted to fly over the Blue Mountains provided it complies with the Commonwealth Airspace Regulations, in 2019, only 5 scenic/charter flights out of a total of 452 flights went over the Blue Mountains.
- 37 Accordingly, the contentions on this issue have no factual basis.

Public safety

- 38 The submissions of BMCC also fail to take into account other substantive and tangible benefits of the proposed development. Sydney Helicopters is a supplier of critical essential and emergency services to various communities in NSW. In this regard, a key and highly relevant consideration is fire and flood safety.
- 39 Consistent with the Planning for Bush Fire Protection guidelines, it is relevant to consider in respect of any development proposed in a bush fire prone area whether the development will increase fire safety risks. If so, those developments are routinely refused development consent.
- 40 Just as it is relevant to consider whether a development increases fire risk, it is equally relevant to consider whether a development will reduce fire safety risk. In this regard, it is plainly evident that the Sydney Helicopters development would substantively reduce fire risks in the Blue Mountains local government area and in other areas by having helicopters readily available for firefighting services.
- 41 We are instructed that there are nine helicopters available for firefighting services and each year the RFS and National Parks & Wildlife engages Sydney Helicopters to undertake hundreds of flight hours over the Blue Mountains and other areas for the purpose of fire safety. These substantive benefits appear to be ignored in the submissions of BMCC.
- 42 In addition, just this week, Sydney Helicopters is currently providing substantial flood search and rescue services to the NSW SES to support communities located on the Hawkesbury Nepean river system.

Conclusion

- 43 Nothing in the submissions of BMCC or other objectors changes our view that the proposed development is properly characterised as a helipad instead of a heliport and that it is permissible with development consent.
- 44 Finally we note that in a letter from DPE to the IPC, the Department responded to the following question:

Q. Does the Department agree with all of the reasoning regarding the permissibility of the use put forward by the Applicant in the Supporting Legal Advice at Appendix P to the EIS? If not, which elements of that reasoning does the Department not agree with?

Response: The Department reviewed the Applicant's Supporting Legal Advice and broadly agrees with the Applicant's reasoning insofar as the Department has reached the same conclusion about the permissibility of the use.

We trust the above is of assistance. Please contact us if you have any queries.

5 July 2022

Yours faithfully



Dr Nick Brunton
Partner
Norton Rose Fulbright Australia



APPENDIX B

PENRITH HELICOPTER RELOCATION - RESPONSES TO INDEPENDENT PLANNING COMMISSION – ACOUSTIC LOGIC

20200346.5/0607A/R0/TA

6/07/2022

Heliport Developers Pty Ltd
89-151 Old Castlereagh Rd
OLD CASTLEREAGH NSW 2749

Attn: Mark Harrold

Penrith Helicopter Relocation - Responses to Independent Planning Commission 30th July 2022

This letter has been prepared to address submissions and comments made by parties during the Independent Planning Commission (IPC) meeting conducted on the 30th of July 2022.

The submissions relating to noise can be summarised into two main topics:

- Maximum noise level assessment
- Sleep disturbance assessment

These items are summarised as follows:

Maximum noise level assessment - L_{max} parameter

Submissions and commentary provided within the IPC meeting raised the use of a maximum noise level for the assessment of the helipad. The L_{max} parameter is the maximum sound pressure level measured over a given period.

An L_{max} assessment of the Penrith Lakes Helipad was conducted in the original Noise Impact Assessment and two subsequent revisions submitted from March 2020 through to October 2021).

As there are no noise emission criteria contained within current Environmental Protection Authority (EPA) policies, in the original iterations of the Noise Impact Assessment, the EPA Noise Control Manual was implemented for the assessment of noise from the helipad. Whilst the document has been superseded by the EPA Noise Policy for Industry, the Noise Control Manual provides a framework for the assessment of helicopter noise, with specific L_{max} requirements to be satisfied for noise emissions.

The EPA Noise Control Manual L_{max} requirements are summarised below:

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9 Sarah St
MASCOT NSW 2020
(02) 8339 8000

ABN 11 068 954 343
www.acousticlogic.com.au

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- (i) *The measured maximum noise level L_{Amax} should not exceed 82 dB(A) at the nearest residential premises or 85 dB(A) at the nearest commercial building.*

As per the original Noise Impact Assessments (March 2020 through to October 2021) the operation of helicopter movements was measured to be 72dB(A) L_{max} at the nearest receivers.

This measured level of 72dB(A) L_{max} was reconfirmed during the sample measurements taken by this office, and with the Departments' acoustic consultant, Rob Bullen on 11 April 2022.

As detailed within the original Noise Impact Assessment, the measured level of 72dB(A) L_{max} is fully compliant with the EPA Noise Control Manual requirement of 82dB(A) L_{max} for helicopter movements.

This L_{max} assessment was removed from the final report, as the ANEF 13 criterion (or 48dB(A) $L_{eq\ 24\ hour}$) was stipulated as being the sole applicable criterion for the assessment of helipad flights by the Department of Planning in their correspondence dated 26 November 2021.

Sleep Disturbance Assessment

Comments provided during the IPC addressed the possibility of sleep disturbance from the operation of the helipad.

We make the following comments:

- Non-emergency flights associated with the helipad are proposed between 7am and 10pm.
- Although neither policy applies to aircraft or air corridors, two EPA documents are typically referenced for the assessment of sleep disturbance; the NSW Noise Policy for Industry and the NSW Road Noise Policy.
- These two policies define "night-time" as 10pm to 7am.
- The trigger / criteria for a sleep disturbance assessment contained within these two policies is for noise generated between 10pm and 7am (night-time), during which non-emergency flights associated with helipad are not proposed.
- As detailed above, the non-emergency flights do not occur within the night-time period of 10pm to 7am, and as such, these helicopter movements would not be subject to a sleep disturbance assessment, noting that neither policy would strictly apply to helicopter flights in any event.

Emergency flights (or any emergency vehicle operation) are exempt from noise assessment, including the sleep disturbance assessment.

Summary

During the assessment process, various noise emission criteria were reviewed and assessed as follows:

Air Services Australia

Principle 6: No residential area should receive more than 60 Leq 24, i.e., no residential area should receive more noise exposure than that which is considered "unacceptable" for residential housing under Australian Standard AS2021. Principle 7: There should be a current agreed aircraft noise exposure level above which no person should be exposed, and agreement that this level should be progressively reduced. The goal should be 95 dB(A).

The noise emission criterion of 60dB(A) $L_{eq\ (24\ hour)}$ is satisfied at all times under the Sydney Helicopters' proposal.

EPA Noise Control Manual

The noise control manual presents the following requirements for helicopters:

- (i) The measured $L_{Aeq,T}$ (assessed over the entire daily operating time of the helipad) should not exceed 55 dB(A) at a residence or 65 dB(A) at a commercial property. Where the existing ambient L_{eq} is greater than the criteria an increase of 2dB(A) above the existing ambient L_{eq} is acceptable.
- (ii) The measured maximum noise level L_{max} should not exceed 82 dB(A) at the nearest residential premises or 85 dB(A) at the nearest commercial building.

The noise emission criteria of 55dB(A) L_{eq} (15 horur) and 82dB(A) L_{max} is satisfied at all times under the Sydney Helicopters' proposal.

Nessdee V Orange City Council L&E Case

The noise emission criterion of ANEF 13 / 48dBA) L_{eq} (24 horur) has been adopted as the compliance parameter within the final Noise Impact Assessment

This noise emission criterion is the most stringent noise emission criterion when compared to Air Services Australia and The EPA Noise Control Manual requirements.

As per the final Noise Impact Assessment, dated 13 April 2022 (ref 20200346.4/1304A/R2/TA), measured noise levels (and the results of the noise modelling) fully comply with the ANEF 13 / 48dBA) L_{eq} (24 horur) requirement.

We trust this information is satisfactory. Please contact us should you have any further queries.

Yours faithfully,



Acoustic Logic Consultancy Pty Ltd
Thomas Aubusson



APPENDIX C

EMAIL CORRESPONDENCE – 4 JULY 2022

From: [Mark Harrold](#)
To: [John Booth](#)
Subject: Fwd: Potential underground fuel tanks
Date: Monday, 4 July 2022 2:41:40 PM

From: Jacqueline Vozzo [REDACTED]
Date: 4 July 2022 at 1:02:00 pm AEST
[REDACTED]
Subject: RE: Potential underground fuel tanks

Mark

I have checked with the office, site supervisors and our main terrestrial maintenance contractor, all have confirmed that they don't recall any underground tanks.

I am advised that there may have been a small above-ground tank in the compound.

I hope this helps.

Jacqui

JACQUELINE VOZZO Chief Executive Officer

Penrith Lakes

[REDACTED] [REDACTED]
penrithlakes.com.au

89-151 Old Castlereagh Road, Castlereagh NSW 2749 | PO Box 457, Cranebrook
NSW 2749



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From: [REDACTED]
Sent: Monday, 4 July 2022 11:09 AM
To: Jacqueline Vozzo [REDACTED]
Subject: Potential underground fuel tanks

Good morning Jacqui

Further to our telephone conversation last week could you provide me with some information or records on whether there were any underground fuel storage tanks installed on our site.

We cannot find any records or any evidence of tanks being installed.

If you could have a look through your records and let me know what you find and how far they date back.

Kind regards

Mark Harrold | Managing Director & Chief Pilot

Sydney Helicopters Pty Limited | Atlantick Pty Limited | Heliport Developers Pty Limited
| Alpine Helicopters | Coast Helicopters

[REDACTED]
PO Box 362 Emu Plains NSW 2750 or 89-151 Old Castlereagh Road, Castlereagh
NSW 2749

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