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Department of Planning, Industry and Environment,  
GPO Box 39,  
Sydney NSW 2001

Attention: Western Sydney Aerotropolis Team

Email [community@planning.nsw.gov.au](mailto:community@planning.nsw.gov.au)

9 March 2021

Dear Sir/Madam

### **Draft Western Sydney Aerotropolis Precinct Plans**

Thank you for the opportunity to provide comment on the Draft Western Sydney Draft Aerotropolis Precinct Plan that is on public exhibition and forwarded to the Environment Protection Authority (EPA) on 10 November 2020.

The EPA provides the attached (**Attachment A**) which include comments, suggested amendments and additional objectives and requirements to help inform the development of the Precinct Plans. These comments relate to:

- Air Quality
- Noise
- Water Quality
- Circular Economy – Waste and Resource Recovery
- Contaminated Land Management
- General Matters

The EPA would like to continue working with the Western Sydney Planning Partnerships Office to help shape the Precinct Plans and supporting Phase 2 Development Control Plan to deliver the environmental and sustainability vision for the Aerotropolis.

The EPA would be able to meet at a mutually convenient time to discuss any of the enclosed comments. Should you require any further information, please contact Mr Paul Wearne on [REDACTED].

Yours sincerely

**JACINTA HANEMANN**  
**Acting Director Regulatory Operations Metro South**

Att.

Phone 131 555

TTY 133 677

Locked Bag 5022

4 Parramatta Square

[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

Phone +61 2 9995 5555

ABN 43 692 285 758

Parramatta

12 Darcy St, Parramatta

[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

(from outside NSW)

NSW 2124 Australia

NSW 2150 Australia

## Attachment A

### Air Quality

Although the draft Aerotropolis Precinct Plan (the Plan) is supported by a draft Air Quality and Odour Study that identified air quality and odour risks across the Aerotropolis precincts, the Plan itself does not specifically discuss air quality nor provide key objectives and requirements to help guide urban design.

The Plan would be strengthened by including objectives and requirements to help reduce emissions and exposure from air pollution. Such objectives would also help support other key guiding principles in the Plan such as delivering green infrastructure, focusing on active transport and movement (including encouraging sustainable transport modes) and addressing areas of land use conflict that will help contribute to improved air quality outcomes.

Strengthening of the Plan in this regard is also needed to support the draft Western Sydney Place Infrastructure Compact (PIC) "*Place Outcomes Framework – Indicators and measures*" for air quality. Its goals include, "*100% of the population enjoys ambient air quality meeting National ambient air quality standards*". Achieving this requires a reduction in current levels of population exposure to air quality that does not comply with the standards.

The EPA provided a range of air quality information including baseline air quality data, suggested provisions, principles and approaches in its letter on the exhibited Western Sydney Aerotropolis dated the 11 March 2020 (Ref No DOC19/1071700-7). This information can help shape the Plan in relation to air quality considerations. If required, a copy of this response can be provided on request.

As highlighted in the draft Air Quality and Odour Study, much of the precinct is currently affected by local air pollution from existing agricultural establishments, waste management and extractive industries. While the Site Based and Regional Air Quality Modelling undertaken for Sydney's Second Airport predicted a contribution to regional ozone from the airport development greater than the EPA's maximum allowable increment and exposure of a number of residences to one-hour concentrations of nitrogen dioxide (NO<sub>2</sub>) greater than the criterion, the assessment did not consider cumulative projected emissions for sources other than the proposed airport, nor did it consider emissions and exposure relating to the precincts that are now proposed.

Complementary planning approaches are needed that help reduce long-term exposure to air pollution. For example, pollution from transport can be mitigated through requiring separation from the most sensitive activities, certain design measures, specific ventilation arrangements and protective vegetation. Such measures can also assist with noise management and liveability. Broad-scale vegetation, consistent with the Premier's priorities, can also contribute to reducing particulate air pollution.

While the EPA supports guiding design principles in the Plan for the delivery of electric vehicle charging stations to help a transition to electric vehicles, moving to zero exhaust emission vehicles is only a partial solution. There are long lead times for transitioning the NSW light vehicle fleet to electric vehicles and transition of diesel vehicles to electric or hydrogen power has not yet commenced. Vehicles also remain a pollution issue due to continuing growth in harmful non-exhaust emissions from vehicles (i.e. road, brake and tyre wear), and delays in moving to tighter emission standards for new petrol- and diesel-powered vehicles at the Commonwealth level.

The Plan would benefit from a supporting Transition Strategy to transition areas from agricultural and industrial uses to residential use, including avoidance of land use conflict. Such a strategy provides an opportunity to build a supporting transitional framework currently missing in the Greater Sydney growth areas, where such conflicts are dealt with during precinct planning without clear guidance or a pathway to help resolve them. In addition, Section 2.4 in the Plan could be

strengthened by the inclusion of a further objective that requires the siting of housing (and other sensitive uses) in areas that are not impacted by existing agricultural and industry emissions as identified in the supporting study (Figures 29 and 35). While the Plan would also benefit the inclusion of such constraints and opportunities such as the development of a Transitional Strategy in the Section titled Opportunities and challenges (pg. 44).

Ambient air pollution arises from many sources, with wood heaters, transport and industry being significant contributors, and is implicated in around 500 deaths per year in NSW (Hanigan 2020). Recognising the need to address air quality impacts in the Plan's vision and priorities will help deliver healthy places and reduce economic costs to the community and Government. To help shape the Plan in relation to air quality considerations, the following comments and suggested amendments are recommended.

- Section 1.1 Vision – beyond business as usual (pg.10) sixth paragraph first dot point (in italics and underlined) “a blue and green framework that integrates the blue and green systems of the waterways, riparian areas, bushlands, parks and open spaces, tree canopy and private gardens, and includes measures to improve air quality, stormwater management and recreation opportunities”
- Section 2.1 Precinct Planning Drivers - Key Driver 6: A resilient city (pg. 32) Key Driver 6 states that "Planning for a resilient city must anticipate changes from climate trends and providing ecosystems to withstand and enhance the blue and green infrastructure." Impacts from climate change include hotter summers, which in turn increases ozone pollution. Exceedances of ozone standards usually occur in the warmer months, with peaks coinciding with high temperature days. South-west and north-west Sydney generally experiences more frequent exceedance days due to ozone pollution. The Precinct Plan includes measures to reduce temperature. The value of these measures could be strengthened by acknowledging their air quality benefits.

The airport will increase emissions of Volatile Organic Compounds (VOCs) which will increase ozone formation ( see Air Quality and the Airport Factsheet). Planting trees and other vegetation to cool the area can assist in offsetting this impact. Further, new development provides an opportunity to require best practice emission controls which can help both minimise exposure to emissions and help reduce contributions of air pollutants to the airshed.

Key Driver 6 also states that “Other key drivers for improving resilience include seeking to minimise urban heat island effects in times of severe heatwaves.” We suggest this includes a reference to increased air pollution in last sentence second paragraph (in italics and underlined) “Other key drivers for improving resilience include seeking to minimise urban hazards such as increased air pollution and heat island effects in times of severe heatwaves”.

This concept of urban hazards is recognised in the planning priorities and actions in the Greater Sydney Regional Plan *A Metropolis of Three Cities* and supporting Western City District Plan. Urban hazards are identified as including noise, air pollution and soil contamination. These plans include as an objective under a sustainable and resilient city, “*exposure to natural and urban hazards is reduced*”. Its further stated that, “*effective planning can reduce the exposure to natural and urban hazards*”.

- Section 2.1 Key Driver 7: Urban comfort and green streets (pg.34). In line with proposed changes to the vision, we suggest this driver be updated to include the following on air quality in first sentence first paragraph (in italics and underlined). “The Western Parkland City vision requires efforts to increase the tree canopy, incorporate blue-green infrastructure, improve air quality, improve efficiency of stormwater and incorporate water sensitive urban design.”
- Section 2.2 Place-based opportunities and constraints (pg.36) suggest the following inclusions to key dot points to strengthen air quality considerations (in italics and underlined).

- Second dot point: "retain creeks within the landscape, undisturbed soils in open space, protect air quality, and retain and enhance existing vegetation for biodiversity purposes"
- Tenth dot point: "locate sensitive land uses outside of areas affected by aircraft noise and industry emissions and plan for low employment density businesses in public safety areas"
- Section 3.2 Blue-Green Infrastructure Framework (pg. 64) amend Principle Guideline 5 to include actions to improve air quality (in italics and underlined). "Contribute to urban cooling, improved air quality and greening through landscaping, retention of water and shading structures". While a section on air quality is also suggested to be included in the Blue-Green Infrastructure Framework narrative.
- Section 3.4 Land Use and Built Form Framework (pg. 118) Designing a built form that aims to flush emissions from road corridors through use of building articulation, varied roof forms and setbacks is encouraged as part of design excellence. This contributes to healthy public spaces and improved public domain outcomes. Suggest the following additional considerations in italics and underlined.
  - " Principle Guideline 5: Design the built form in a way that creates quality public places, including roadway ventilation and solar access".

To also help drive better design suggest the inclusion (italics) of the following additional dot point in section 3.4.2 Land use and built form objective LUO3: Design built form (height and footprint):

*"varies articulation and roof forms to encourage flushing of pollutants from street canyons"*

## Noise

The EPA understand that a supporting Noise Assessment was prepared but not exhibited with the Western Sydney Aerotropolis package. The EPA is able to provide comment on this assessment if needed to help with the shaping of the Plan, as the management of noise will be an important consideration in the design of places to ensure they provide a high level of amenity and liveability.

It appears that most of the noise control effort has been directed towards the control of aircraft noise. While important, noise emissions from activities including industry, vehicles, plant, entertainment and commercial activities in a mixed-use setting has the potential to cause significant disturbance to sensitive residential land uses unless it is carefully planned. The following comments are provided to help guide the shaping of the Plan in relation to these matters.

It is important that adequate planning controls are in place to identify and manage noise-based land use conflict issues. Addressing potential noise issues retrospectively (that is following development) can be challenging and expensive and lead to community complaint.

The EPA considers that implementing noise control at the urban design stage provides the most effective means of minimising noise impacts on communities. This is best achieved by applying the following hierarchical approach to noise control.

1. Spatial separation of incompatible land use through appropriate zoning and placement of activities to minimise noise-related land use conflicts.
2. Minimising noise emissions at source through best practice selection, design, siting, construction and operation as appropriate.
3. Reducing noise impacts at receivers through best practice design, siting and construction.

Sustainable land use planning and careful design and location of development offers the greatest opportunity to manage noise. Noise generating activities and noise sensitive areas should be separated where practicable. For example, separating incompatible land uses with commercial buildings or recreation space or similar will provide a physical barrier and / or spatial separation. Retrospective control options are usually limited and more expensive.

Guidelines including the *NSW Road Noise Policy* (DECCW, 2011) and the *Rail Infrastructure Noise Guideline* (EPA, 2013) provide guidance in relation to land use planning to manage road and rail noise respectively. These complement planning guidance provided in the *Development Near Rail Corridors and Busy Roads—Interim Guideline* (Department of Planning, 2008) which recognises the need for judicious land use planning, architectural design, building orientation and good internal layout to achieve acceptable acoustic amenity for residential development in proximity of busy transport corridors.

This type of approach has been applied successfully to provide an early indication to potential developers of expected noise emission requirements, and to preserve the noise amenity in adjacent areas.

The supporting draft Air Quality and Odour Report indicates that the precinct is currently impacted by local air quality issues from existing agricultural establishments, waste management and extractive industries. However current rural land uses provide separation from sensitive land uses. In the absence of a supporting noise assessment, it is likely that similar observations may exist for potential noise related impacts from these existing activities. This requires careful planning in the design of the precincts especially in areas where sensitive residential land uses are proposed. Similarly, as suggested in the above comments on air quality, the Plan would benefit from a supporting Transition Strategy.

Further, Section 3.4.2 Land use and built form (pg. 125) Objectives LUO3 should be strengthened to include the following additional dot point to ensure design of built form (including height and footprint) considers measures that can avoid impacts from land use conflicts.

*“To minimise conflict between land uses within this zone and land uses within adjoining zones”.*

The Plan includes a range of objectives where appropriate supporting development controls will be needed to help their delivery and guide the management of noise. These include objectives such as enabling 24-hour operation of activities including new aerospace and defence industries, providing high levels of public domain and mixed-use settings associated with transit-oriented development. The EPA is able to continue to work with the Western Sydney Planning Partnership Office (PPO) in helping to shape appropriate noise provisions in the Phase 2 Development Control Plan (DCP).

A range of noise mitigation strategies can also be implemented at the subdivision design stage to manage unavoidable noise impacts. This can include the application of noise control measures into the building design to ensure internal noise levels are acceptable. Advice is provided in *Noise Guide for Local Government* (EPA, 2013) and the *Department of Planning’s Development Near Rail Corridors and Busy Roads—Interim Guideline*.

## **Water Quality**

Section 3.2.4 “Riparian corridors and farm dams” (pg.74) in the Plan outlines the following requirements to protect, restore and maintain water quality and waterway health within the Aerotropolis precincts

- BG3: Improve the health of waterways and riparian land through the *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions* (OEH/EPA 2017) to manage the cumulative impacts of development.
- BG6: Development should result in beneficial improvement without adverse impacts and should be designed to consider the water quality in any waterway, or entering the waterway and the quantity of water entering any waterways
- BG8: Waterway values are protected and enhanced through risk-based approaches that mitigate development impacts

It is unclear in requirement BG6 how adverse impacts to waterways would be determined and how design would be delivered in the absence of performance criteria and industry guidance. It is also unclear how requirement BG8 would be measured and met.

The *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions* (OEH/EPA 2017) referred to in requirement BG3 provides a framework that decision-makers can use to help manage the impact of land-use activities on waterway health. It allows decision-makers to determine management responses which meet waterway health outcomes that reflect the community's environmental values and uses of waterways. Management responses could include specific development controls for stormwater management, informing licence limits for waterway discharges, or programs that raise awareness of land use activities that protect and enhance the health of waterways. In this regard the requirements BG6 and BG8 would benefit being merged and revised to include reference to the water quality outcomes and associated management measures identified under BG3. The following changes are recommended:

*BGxx: Development should be designed to mitigate waterway impacts and improve waterway health through implementation of management measures and outcomes identified through application of the "Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions" (OEH/EPA, 2017).*

The Phase 2 Development Control Plan will be an important piece of work providing further detailed information and guidance for industry to help in the design of new development in delivering the waterway health objectives and requirements detailed in the Plan. The EPA is able to continue to work with the PPO and other Government agencies in the development of appropriate control provisions.

The Plan is supported by a Stormwater and Water Cycle Management Study that proposes an integrated water cycle management system that balances potable water, wastewater, recycled wastewater and harvested stormwater within the precincts. It includes stormwater management strategies aimed to minimise the volume and improve the quality of stormwater runoff from urban catchments by retaining water within the landscape. This approach is supported by objective LUO1 (3.4.6 Urban typologies pg. 135) in the Plan which states:

*"Retain water in the landscape and irrigate tree canopy to support urban cooling within an individual lot, super lot area as well as a master plan scale".*

While such an approach is supported, the *Draft Western Sydney Aerotropolis Constraints and Land Capability Assessment –Stage 1 Report* provided with the Plan highlights the significant challenges with salinity in the Aerotropolis landscape that requires careful planning and management. In particular, the design of water sensitive design measures where infiltration strategies are proposed. The Plan would benefit recognising such constraints in Section 2.2 (pg. 36) where careful design and management for water management is needed across the Aerotropolis precincts.

In addition, Section 3.2.5 Integrated water management and water sensitive urban design (pg. 77) would benefit a further requirement that recognises salinity risk and the need for appropriate management. The following additional requirement is recommended:

*"Any strategies to retain water in the landscape should be complimented by management measures to address any potential risks form salinity and sodicity to protect waterway health and prevent water pollution".*

With the design of the Western Sydney Aerotropolis including the delivery of the Wianamatta South Creek Precinct, a range of green infrastructure including open space, retained farm dams and stormwater infrastructure and associated water quality devices, a costing and funding framework needs to be established for its delivery and maintenance. For example, as highlighted in the PIC

there is a high cost associated with stormwater infrastructure, regardless of whether a business-as-usual or a whole-of-water cycle management approach is adopted. In addition, this may only increase with new and more efficient contemporary WSUD controls, for example water gardens requiring maintenance every six months. The Draft Western Sydney Aerotropolis Special Infrastructure Contribution (SIC) should provide an important complimentary role to help support funding arrangements in the delivery and ongoing management of green infrastructure because of its public benefit. However, it is unclear if such funding is identified in the draft SIC.

The proposed action 9 in the PIC: “Whole-of-water cycle and stormwater management reform as part of place-making” recognises a need for the roles, responsibilities and funding arrangements to be clarified and determined. It also recognises a suite of funding sources from the NSW Government, developer contributions and the private sector needs to be considered in the context of overall feasibility and implementation drivers. In this regard the draft SIC should be considered in response to this action and whether there are opportunities for it to provide an important funding source for the delivery and management of green infrastructure. Work being delivered by Water NSW on delivering the aspirations of the Parkland City and South Creek may also assist.

### **Circular Economy - Waste and Resource Recovery**

In general, the EPA supports the directions on circular economy including waste and resource recovery in the Plan. However, the Plan could be strengthened in several different areas to help with design and delivery of these key directions. The following comments and suggested amendments are recommended.

- Section 2.2 “Place-based opportunities and constraints” (pg. 36) strengthen the design opportunities for a place-based approach to also include circular economy and safe and efficient waste considerations. Include the following additional dot point

*“Design places that incorporate a circular economy and support innovative best practice waste management collection systems and technologies for reuse, recycling, organics collection and product stewardship”.*

- Section 2.3 “Planning Priorities setting the framework for the Precinct Plan” (pg. 37) under the section Place and Built Form include the following additional sentence at the end of the second paragraph.

*“While delivering a circular economy will help support sustainable and liveable places”*

- Section 3.6 Sustainability and Resilience Framework includes objective SRO13 which states: *“Recognise waste as a resource and the collection and transport of waste and recycling as an essential service that must be undertaken in a manner that is safe, efficient, cost effective and does not negatively impact on liveability and the environment”.*

While this objective is supported, there is an opportunity to build upon its intent to help reduce amenity impacts from kerbside collections of bins, especially in medium density areas. In addition, laneways and entry points to buildings should be designed to a higher-level specification to accommodate safe passage of Heavy Rigid Vehicles (HRV) where they are used for waste collection services. To address these issues the following additional inclusions are suggested (italics and underlined) in the Assess and Movement Framework in the Plan

- Section 3.3 Transport Strategy Requirement AM4 Access and movement framework (pg. 92). Provide a highly efficient road network for private vehicles, freight, *services including waste and recycling collection vehicles* and all other modes which focuses on local accessibility in centres where accessibility is critical to network function. Intermediate roads have a balanced focus of access, place and movement.

- Section 3.3.5 Road Network Requirements AM2 (pg. 99). Provide safe and sustainable street grid layouts to enhance connections, accommodate tree planting, facilitate waste collection vehicle access and retain emergency vehicle accessibility.
- Table 1: High order road networks street types - Laneways (pg. 116). For low density housing and in most medium and high-density housing, laneways may be used more as either collection points for kerbside services (especially where this is not possible from the front of properties) or for waste collection access to basements or onsite collections. In this case, some laneways may need to be designed to allow for HRVs and Medium Ridge Vehicles (MRVs) to access and manoeuvre with ease and safety. For this reason, it is recommended a minimum 7m kerb to kerb width should be maintained. However, the principle control in the Plan proposes a 5 m carriageway width (see Figure 28 page 116 of the Plan). The PPO may wish to have further discussion with local Councils regarding the adequacy of this width to ensure for safe and efficient waste servicing.

- Currently there is increasing pressure for a range of competing uses for space at the kerb and footpath area of streets. This includes the provision of active transport, safe pedestrian use, parking, bus stops, green infrastructure and utility provisions where a transition from business as usual approaches involving kerbside collection of bins is needed. With areas of the Aerotropolis accommodating medium to high density development (where these issues are a particular problem) it is important that the Land Use and Built Form Framework (Section 3.4) be strengthened to provide a guiding principle that would help drive design that could deliver innovative waste and recycling service solutions such as vacuum systems. In this regard the following additional guiding principle should be included in the framework

*“Design buildings and places that help deliver and support innovative waste and recycling solutions including integrated servicing approaches”.*

- Section 3.4.2 Land use and built form Objectives (pg. 125) include the following additional dot point under objective LU03 that will help guide waste servicing design

*“permits essential service vehicle access and the provision of waste and resource recovery collection infrastructure integrated within the development without compromising safety and the amenity of the public domain”*

- Requirements for all Precincts (pg. 126) include consideration of service and waste collection infrastructure in LU7 (Italics and underlined). Achieve the locational criteria of particular social and public domain uses (such as education, open space, drainage and conservation), service and waste collection infrastructure, as well as neighbourhood and local centres
- Section 3.4.8 Subdivision and block structure Objectives and Requirements (pg. 140) include waste collection in key requirements (Italics and underlined)
  - LU02 Enable the block and street needs to suit the various land use, waste collection requirements and development types.
  - LU2 Design block structure to ensure efficient public transport and waste collection routes
- Section 3.4.11 Sites greater than 5,000sqm Objectives and Requirements (pg. 150) include the following additional wording on waste collection LU01 and LU4 (Italics and underlined)
  - LU01 Provide an appropriate block size for the Zone and ensure a finer grain to the urban structure, to improve public transport, pedestrian, bike and vehicular access, waste collection service operations, permeability and connectivity through large sites.
  - LU4 Sites greater than 5,000sqm should allow for through-site connections by providing pedestrian pathways, cycle ways, integrated waste collection service infrastructure or new streets that are consistent with the Precinct Plan.

- Section 3.6 Sustainability and resilience framework - Principle 5 (pg. 169) suggest the inclusion (Italics and underlined). Essential waste and resource recovery in the Aerotropolis and public places should not impact on the amenity for workers, residents, and the public such as visually unpleasant waste storage areas, noise, traffic and odours from waste collection services
- Precinct Plan Requirements (pg. 172) suggest the following inclusion (Italics and underlined)
  - SR3 Ensure waste and resource recovery storage and collection infrastructure is integrated within a developments built form and where possible across separate developments while addressing storage, safety, vehicle access, efficiency, accessibility to waste, reuse and resource recovery services without compromising the safety and amenity of the public domain.
- Section 5.1 Infrastructure Delivery (pg. 203 – 205) would benefit the inclusion of waste provisions similar to other high-level infrastructure requirements to ensure appropriate waste and resource recovery infrastructure is planned for and protected. Such provisions are suggested for the PPO's consideration:
  - *Waste and resource recovery infrastructure to be planned and provided for that is responsive to future needs and supports resource recovery.*
  - *Existing waste and resource recovery facilities and location requirements that support co-location of complimentary waste infrastructure should be protected.*

### Contaminated Land Management

The Plan would benefit the inclusion of a supporting objective for contaminated land management in the Precinct Planning framework (Section 2.4) and include its recognition as a key challenge across all Precincts (as identified in the Draft Western Sydney Aerotropolis Constraints and Land Capability Assessment –Stage 1 Report) where management is needed to help deliver the required end land use. This will help build upon the requirements in *State Environment Planning Policy 55* and any provisions in the Phase 1 and 2 DCP. The following additional inclusions are recommended (in italics and underlined)

- Section 2.4 Aerotropolis Core, Badgerys Creek and Wianamatta-South Creek Precinct objectives (pg. 41) include the following additional objective
 

*“Ensure that any work required in relation to contamination is appropriately managed.”*
- Aerotropolis Core, Badgerys Creek and Wianamatta-South Creek Precinct - Opportunities and Challenges (pg. 44) include the following additional opportunities and challenges:
  - *“improved land use once contamination has been cleaned up”* as an opportunity; and
  - *“Unexpected contaminated land or asbestos could be discovered during excavation or redevelopment”* as a challenge.
- Northern Gateway Precinct Opportunities and Challenges Plan (pg. 50) include the following additional opportunities and challenges:
  - *“improved land use once contamination has been cleaned up”* as an opportunity; and
  - *“Unexpected contaminated land or asbestos could be discovered during excavation or redevelopment”* as a challenge.
- Agribusiness Precinct Plan Opportunities and Challenges Plan (pg. 53) include the following additional opportunities and challenges:
  - *“improved land use once contamination has been cleaned up”* as an opportunity; and
  - *“Unexpected contaminated land or asbestos could be discovered during excavation or redevelopment”* as a challenge.

## General Matters

While Section 5 of the Plan (pg. 208) includes a requirement for development to investigate future planned utility infrastructure, including the aviation fuel pipeline. The EPA understands that work is being progressed by Transport for NSW on this new fuel pipeline. However, with land use settings being secured through this Plan it is important that the Plan provides the flexibility to support the delivery of this pipeline including recognition of an indicative corridor. The Plan would also benefit in its narrative under Section 5 the importance of this fuel pipeline for the future operation of Sydney's Second Airport. In particular, Infrastructure Australia has identified this pipeline as a high priority initiative with the identification and preservation of a corridor. The airport, when fully operational, could potentially require 50 to 65 B-double fuel tanker deliveries per day. Removing such activities off the road would not only remove congestion but a potentially hazardous haulage activity.