

**2 November 2016**

**Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001**

**Attention: Natasha Harras**

**Re: DA2-MOD 6 / DA3 MOD 5 /DA 4 MOD 10 - Importation of VENM and ENM - Penrith lakes  
Development Corporation**

The Nepean Park property is located at 1404 Castlereagh Road, Castlereagh, and is currently accessed through the Penrith Lakes lands from an access road, off Castlereagh Road, south of Church Lane (see Map below). There is a two (2) storey Georgian mansion located towards the western boundary of the property which was constructed in the 1820s. This building is referred to as 'Nepean Park', which is currently not listed as an item of Environmental Heritage in the Penrith Local Environmental Plan (Heritage Conservation) and is not listed on the State Heritage Register.

Nevertheless Nepean Park has been identified as representing one of the most important homesteads in the Nepean River Valley and within the State of NSW on account of its age and historical associations. Nepean Park is identified in the State Environmental Planning Policy Penrith Lakes Scheme as a heritage item (Nepean Park, Part portion 48, Parish of Castlereagh, County of Cumberland - No. 2 in the Structure Plan).

The property is one of a few privately owned properties with the Penrith Lakes Scheme Area, and has been owned and farmed continuously by the Dixon family since the 1930's. Dixon's continue to maintain the residence and farm the land for agriculture as a productive farm utilising the rich fertile soil of the Nepean River floodplain.

The site is legally described as Lot 482 DP 849952, and is zoned Rural 1 (a2) under Interim Development Order 93 (IDO 93), Penrith City Council.

In 2015 the Office of Penrith Lakes (OPL) released a 'Draft Vision Plan' for the Penrith Lakes site, looking at future master planning options following consultation and feedback from local community and stakeholders. Nepean Park made a submission which looked at future compatible landuses for the area and the Nepean Park site. This process is ongoing and Nepean Park continue to consult with the OPL in relation to future uses at the site.

Whilst most of the active quarrying and remediation activities have ceased from within the immediate vicinity of Nepean Park heritage area there continues to be issues relating to the existing backfilling operations along Castlereagh Rd. In particular noise and dust from the existing operations and activities at this location.

We understand the Penrith Lakes Development Corporation (PLDC) is seeking a 75W modification to intensify operations (increase hours of operations and corresponding extension of a significant volume of truck movements into these hours).

Nepean Park are specifically concerned with the degree of the proposal and the extension of operating hours to within the critical early morning and late evening periods. The proposed extension represents a significant increase in volume of truck movements to these critical sensitive time periods of early morning and late evening periods. We are not talking about a 10 to 15 movements per hour which subject to satisfying noise constraints. Forty (40) movements within a 6am to 7am period is very significant with obvious potential for cumulative adverse impacts within a rural residential setting. Correspondingly the ability to increase truck movements by 30 from 6pm to 9pm is significant considering the proposed time and degree of movements.

The ARUP assessment claims that it is reasonable to apply daytime noise criteria to this early morning 6am to 7am period. This period should be properly assessed as it is a critical period of the morning for receivers. Nepean Park already have issues relating to noise from current activities. We are very concerned that the assessment from ARUP has not fully addressed the potential impacts and has incorrectly made assumptions in relation to appropriate background criteria for these periods. This is unacceptable for such a large number of movements within a rural residential area at such times.

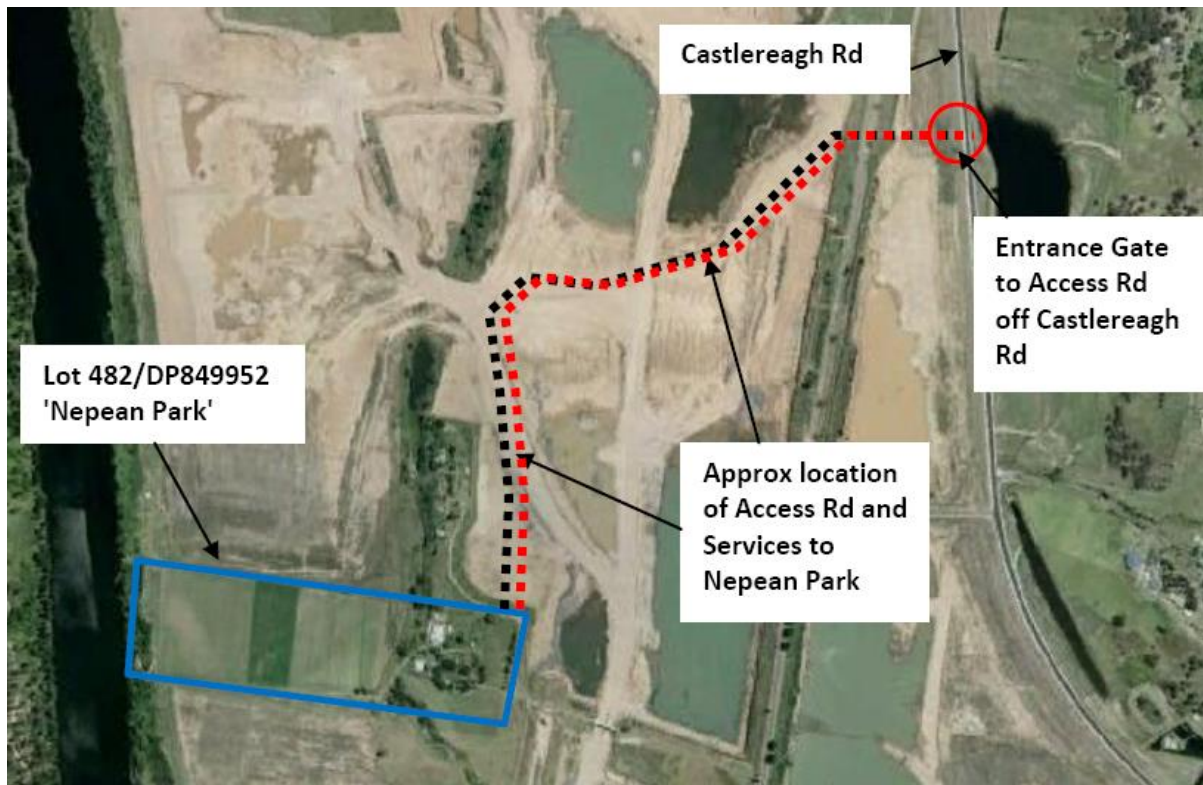
The recommendation to 'manage truck movements to reduce impacts' and the division of overall daily truck movements to several access points to reduce impacts on any one road segment is a very vague recommendation, open to any interpretation and non-committal. This also seems to conflict with the initial assessment in concluding that impacts from the modification will be minor.

Nepean Park residents already experience noise issues from trucks entering and exiting the site and tipping loads. Dust issues are significant during adverse winds and noise issues relating to these operations from trucks and associated movements into and out of the site are an issue for us. Noise is of prime concern from the current operations. Nepean Park have contacted the PLDC on numerous occasions relating to noise exceedances from the existing operations.

If is of significant concern for Nepean Park that such a proposal to extend truck movements and operating hours into critically sensitive time periods of the morning and evening, with no proper assessment and loose recommendations in such a residential context. Once again we are not talking about a small number of movements within the existing and proposed consents. The proposal to increase 40 truck movements from 6am to 7am and 30 movements up to 9pm is of grave concern for Nepean Park. This is a significant volume of trucks for a sensitive period of the morning and evening with significant noise related impacts in particular.

We strongly object to the proposal and wish to see more assessment in relation to real impacts.

Kind Regards,  
Mark Dixon  
Director  
Nepean Park Pty Ltd.



Aerial view of Nepean Park property and current service and access arrangements.