



Our Ref: 6425336  
Contact: Peter Wood  
Telephone: (02) 4732 7577

12 December 2014

Thomas Piovesan  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

By email: [Thomas.piovesan@planning.nsw.gov.au](mailto:Thomas.piovesan@planning.nsw.gov.au)

Dear Mr Piovesan

**Notice of Exhibition – Section 75W Modification Application for DA2 MOD5, DA3 MOD4 and DA4 MOD9 for the Importation of Additional Fill (Ref No. 10/2465)**

Reference is made to your correspondence dated 17 October 2014 seeking comment on the above proposed modification applications and supporting Environmental Assessment Report.

The Modification Applications and accompanying Environmental Assessment Report for the abovementioned project has been reviewed and the following submission comments are provided for your consideration and action:

**Planning Matters**

- It is understood from the application that the Department has approved a 2 year plan in 2013 and an updated schedule of importation of VENM was approved in 2014.
- To manage off-site impacts, mechanisms need to be put in place so that it can be assured that the Statement of Commitments included in the application is complied with. This is required to ensure that all of the required mitigation measures proposed are implemented. In addition, the provisions of the Statement of Commitments in relation to the soil material will also assist in ensuring that contaminated material is not brought onto the site. It is requested that conditions of consent be imposed to ensure that environmental management commitments outlined within the application are adhered to. In addition the following should be specifically conditioned if the application is supported:-
  - Adequate erosion and sedimentation (Soil and Water Management) controls are in place to ensure that no impacts to water quality; and
  - All disturbed areas are to be reinstated.

Penrith City Council  
PO Box 60, Penrith  
NSW 2751 Australia  
T 4732 7777  
F 4732 7958  
[penrithcity.nsw.gov.au](http://penrithcity.nsw.gov.au)

## **Traffic Management and Infrastructure**

- The importation of additional fill will result in an increase in vehicle movements in and out of the site and within the local road network. The application indicates that 238 trucks per day (476 truck movements) will be required which is in addition to the existing fill approval and associated truck movements. The impacts of this intensification on the condition of the road network need to be considered.
- The frequency of truck movements proposed and the resulting safety implications on existing vehicles using Castlereagh Road needs to be considered. The roadway within the urban area of Cranebrook does not provide continuous two lanes in each direction. Consideration should be given to the early upgrade of Castlereagh Road to provide a dual carriageway width extending from McCarthy's Lane to Cranebrook Road.
- Council has reviewed the existing function and capacity of Andrews Road and the Castlereagh Road section north of Cranebrook. These roads will experience traffic growth over the existing approved forecast, and while it is acknowledged that the volumes are predicted to be below peak approved movements, the prolonged use of the road network and the potential degradation of the road pavement needs to be considered.
- The intersection treatment at Castlereagh Road and Northern Access Road 8 as shown on the proposed J. Wyndham Prince Drawing No. 9600\_Dar-002(C) should be conditioned to be implemented in order to facilitate controlled access movements for heavy vehicles. A Roads Act application is required to be lodged with and approved by Penrith City Council for the proposed upgrade works.

## **Flood Management Matters**

- The Penrith Lakes Scheme is an area that is highly sensitive to flooding impacts. The proposed modification for the importation of 5 million tonnes of additional fill does not provide a lot of information in regard to flooding. This issue will need to be closely examined in the context of other considerations, in particular regarding the draft water management plan and final landform.

## **Public Comment**

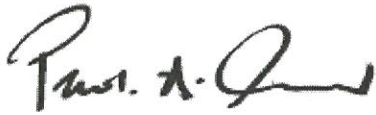
Council has also received a written submission from a concerned resident who has raised the following matters:-

- The proposal results in an unsatisfactory increase in truck movements being 111,110 movements per year (associated with 36 tonnes of fill material per truck) which equates to approximately 47 truck movements per hour; and
- The additional truck movements will result in additional strain and damage on the local road network as well as noise and air pollution impacts.

Please ensure these comments are considered in the assessment of the application and that any additional information submitted in response is made available to Council for further review and comment.

Should you require any clarification on the issues raised above or wish to discuss the matters in further detail, please don't hesitate to contact me on (02) 4732 7526.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Paul Lemm', with a stylized flourish at the end.

Paul Lemm  
**Development Services Manager**