



10th December 2021

Mr Brad James
Principal Case Manager
Office of the Independent Planning Commission NSW
Suite 15.02, Level 15
135 King Street
Sydney NSW 2001

By email to: bradley.james@ipcn.nsw.gov.au

Dear Mr James,

Re: Kariong Sand and Soil Supplies SSD8660 – Comment on Additional Conditions Proposed by Department of Planning, Industry and Environment

Thank you for your email on 3rd December 2021 setting out additional draft conditions of consent recommended by the Department of Planning, Industry and Environment (DPIE) dated 2nd December 2021 for Kariong Sand and Soil Supplies (SSD8660).

The applicant has reviewed the suggested amended conditions of consent as outlined in Attachment 1 of DPIE's letter to the Independent Planning Commission (IPC).

The applicant agrees to the suggested amended conditions of consent, except for Condition B33(g). The proposed condition is outlined below:

B33(g): All trucks entering or leaving the site use the wheel wash to be installed prior to commencement of operation.

It is noted that wheel washes on industrial premises are an effective way of minimising the tracking of soil and sediment onto public roads when vehicles leave a site, particularly during wet weather. This can assist in avoiding impacts on stormwater off-site.

The applicant is open to this as an additional mitigation measure, to supplement the comprehensive range of measures proposed for sediment control on the site as outlined in the Environmental Impact Statement and the Water Cycle Impact Assessment and Water Management Plan. However, the applicant notes that as a sediment control measure:

- Washing of wheels of trucks leaving a site is not necessary during dry weather, as tyres of trucks do not generally pick up and transport sediment. By requiring all trucks to use the wheel wash in dry weather will reduce the efficiency of traffic operations;

- It is unnecessary nor warranted for trucks entering from a public road to use the wheel wash prior to entry of the site. This will serve no benefit and will only reduce the efficiency of traffic operations; and
- We are unaware of any industrial site that is required to wash wheels prior to entry, unless it is for biosecurity reason (this is not a particular risk of concern for the proposed development).

The applicant respectfully requests that the IPC considers alternative wording should a consent condition regarding a wheel wash be considered necessary, as shown below:

B33(g): A wheel wash is to be installed prior to commencement of operations and is to be used by trucks leaving the site when required to prevent the tracking of sediment onto public roads.

Thank you for considering this request. Please contact me should you need anything further.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Adm. (USYD)

Director

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