ENERGYAUSTRALIA

PIPERS FLAT
RAIL COAL UNLOADER

SECTION 75W MODIFICATION – RESPONSE TO SUBMISSIONS

PROJECT APPROVAL 06_0271

Lycopodium

6207-REP-015

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Table of Contents

Page

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S75W Modification Pipers Flat Rail Coal Unloader – Response to Submissions

Prepared for EnergyAustralia NSW Pty Ltd

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Date:	26th October 2018	Date:	26th October 2018

ABBREVIATIONS

Council	Lithgow City Council
DPE	NSW Department of Planning and Environment
DPI	Department of Primary Industries
EnergyAustralia	EnergyAustralia NSW Pty Ltd
EPA	NSW Environment Protection Authority
EPA Act	Environment Planning and Assessment Act 1979
EPL	Environmental Protection Licence
JHR	John Holland Rail
Lycopodium	Lycopodium Infrastructure Pty Ltd
OEH	Office of Environment and Heritage
PAD	Potential archaeological deposit
POEO Act	Protection of the Environment Operations Act, 1997
RTS	Response to submissions
TfNSW	Transport for NSW

1.0 INTRODUCTION

1.1 Overview

This Response to Submissions (RTS) Report has been prepared by Lycopodium Infrastructure Pty Ltd (Lycopodium) on behalf of EnergyAustralia NSW Pty Ltd (EnergyAustralia) to address submissions received during the public exhibition of the *Pipers Flat Rail Coal Unloader Environmental Assessment* (August 2018) (the Environmental Assessment) prepared to accompany a Section 75W modification request (06_0271 MOD1), under the *Environmental Planning and Assessment Act, 1979* (EPA Act), to the Western Rail Coal Unloader (project approval 06_0271) (the Approved Project).

The Environmental Assessment was placed on public exhibition from 7th September 2018 to 21st September 2018. A total of 9 submissions were received from government, agency, organisations and the public. The submissions are summarised and addressed in Section 2 of this RTS Report.

1.2 Background

The Approved Project is required to secure coal supply to the Mount Piper Power Station, located approximately 25 kilometres north west of Lithgow, NSW. A secured coal supply will enable the continued operation of the Mount Piper Power Station and ensure ongoing energy security for NSW, in the event of interruptions to local coal supply.

The Mount Piper Power Station has a rated capacity of 1400 megawatts and supplies approximately 15% of NSW electricity needs, enough to power up to 1.2 million average homes. The proposal would enable coal to be sourced from alternate mine areas and be delivered by rail to Mount Piper Power Station.

The Approved Project includes the following key project elements:

- A rail loop off the Gwabegar branch line (Branch Line);
- A coal unloader building which would allow coal to be delivered into a hopper located below the rail line which included an office and amenity area;
- A conveyor system to carry coal from the coal unloader building to the existing coal handling facility at the Mount Piper Power Station;
- A locomotive provisioning area for refuelling and sanding;
- A rail wagon maintenance area; and
- A diesel fuel storage area.

1.3 Overview of Exhibited Modification

As described in the Environmental Assessment, the proposed modification amends design elements of the approved rail loop and coal unloader as required to enhance constructability, provide operational efficiencies and improve environmental outcomes relative to the Approved Project.

In summary, the key changes proposed to the Approved Project are as follows:

- A redesign of the rail loop to better optimise the natural land contours, reduce the maximum height of the rail embankment by 4m and provide two branch line connections (rail loop and optional rail spur);
- Repositioning the coal unloader approximately 250m to the west, to line up with the overland conveyor;
- Removal of the approved transfer conveyor and intermediate transfer station (given the realignment and direct connection of the overland conveyor and coal unloader); and
- Removal of certain approved ancillary infrastructure such as the wagon maintenance area, locomotive provisioning area and diesel storage area.

Figure 1 shows the currently Approved Project overlaid with the proposed modification.

In addition, an extension to the lapse of the consent is also sought and amendment to the conditions of approval and the statement of commitments to reflect the modified Project (refer to Environmental Assessment for full details).

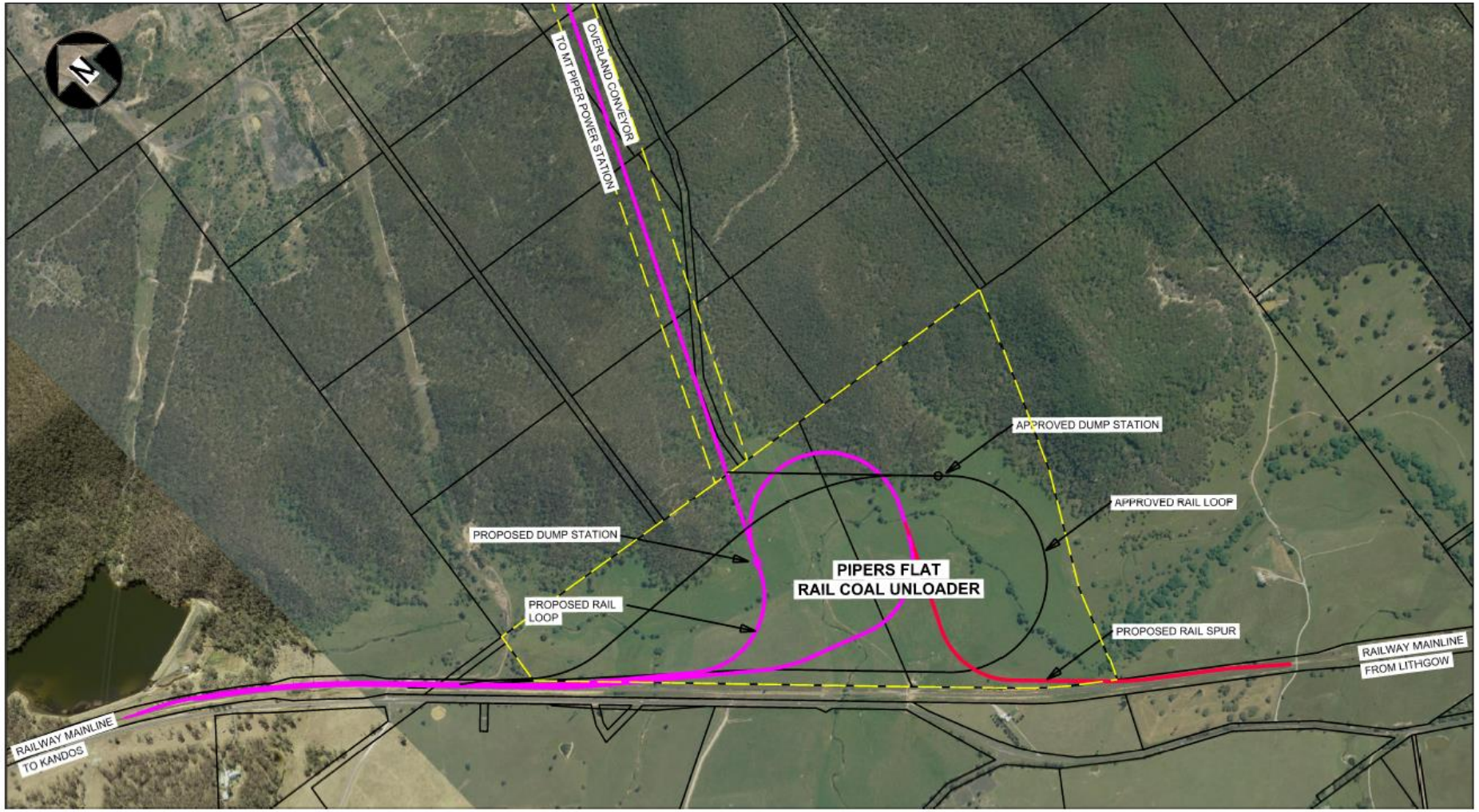

Figure 1. Rail Loop Alignment

1.4 Submission Summary

A total of 9 submissions were received from:

- Government, agency and organisations (9); and
- Public (1).

The majority of submissions were in the form of comments or suggested conditions. One objection was received from the public.

In response to the submissions a revised statement of commitments has been prepared (refer Section 3). No other changes to the proposed modification are proposed and no additional environmental assessment has been undertaken for the RTS Report.

2.0 SUBMISSION SUMMARY AND RESPONSE

2.1 Part A – Response to Government, Agency and Organisation Submissions

2.1.1 Department of Planning and Environment, Division of Resources & Geosciences

Item 1 – Adjacent mining lease

The Department of Planning and Environment, Division of Resources & Geosciences provided advice that mining lease CCL712 is held by Ivanhoe Coal Pty Ltd, directly adjacent to the area for project approval 06_0271, and confirmed the proposal is considered to not impede activities associated with the adjacent mining lease.

Response

The advice is noted.

2.1.2 Lithgow City Council

Item 1 – Clarification of condition 2.30 of PA06_0271

Lithgow City Council in their correspondence provided clarification for the timing of intersection works (which are required by condition 2.30 of the Project Approval) confirming that the intersection upgrade is to occur prior to any oversize vehicles accessing the site for construction of the development.

Response

EnergyAustralia supports the proposed timing for intersection works.

2.1.3 NSW Environment Protection Authority

Item 1 – PA06_0271 statement of commitments and RTS

The NSW Environment Protection Authority (EPA) notes commitments previously made in the statement of commitments and RTS including post construction dust monitoring and communication procedures with those residents potentially affected by noise and vibration.

Response

EnergyAustralia confirms its commitment to undertake post construction dust monitoring and ongoing communication with potentially affected residents in accordance with condition 3.2 and 6.2 of the Approved Project.

Item 2 - Recommendations

The EPA recommended the following in relation to the proposed modification:

- *Sufficient protective barriers are in place within proximity to the creek systems to ensure any coal spillage from stationary trains parked over the creeks or otherwise does not enter the creek systems;*

- *In addition to take up rollers for the conveyors and coal transfer towers being designed within acoustic enclosures; the proponent evaluates the use of 'low-noise' rollers for the conveyor system.*

Response

EnergyAustralia supports the two recommendations and have updated the statement of commitments accordingly.

Item 3 – Environment Protection Licence

The EPA noted the proposed development is a scheduled activity being 'coal works' as per Schedule 1 of the *Protection of the Environment Operations Act, 1997* (POEO Act).

Response

The advice is noted and an environmental protection licence (EPL) will be sought as required.

2.1.4 Office of Environment and Heritage

Item 1 – Native vegetation to be cleared

The Office of Environment and Heritage (OEH) provides the following recommendations in relation to vegetation clearing and the compensatory habitat package required in accordance with condition 2.38:

- *The area (hectares) of each plant community type to be cleared for the entire project (ie rail loop, conveyor and associated infrastructure) be quantified prior to construction commencing, and an appropriate compensatory habitat package developed consistent with condition 2.38 of consent 06_0271; and*

- *A completion date for the compensatory habitat package is included in the modified conditions of consent.*

Response

EnergyAustralia supports the recommendation and confirms the commitment to provide a compensatory habitat package per condition 2.38 of the Project Approval. It is noted that condition 2.38 includes a completion timeframe for the compensatory habitat package, stating that *'funding or*

works associated with the compensatory habitat package shall be completed to the satisfaction of the Director-General prior to the relevant vegetation clearing'.

Item 2 – Threatened flora species

OEH provides the following recommendations in relation to threatened flora species and the compensatory habitat package required in accordance with condition 2.38:

- *Targeted surveys should be conducted in the rail loop realignment and the conveyor belt corridor for threatened flora species with the potential to occur on site during appropriate survey periods as identified in Bionet; and*

- *Any threatened flora to be impacted should be quantified, and an appropriate offset provided as part of the compensatory habitat package required by condition 2.38.*

Response

EnergyAustralia supports the recommendation and has updated the statement of commitments accordingly.

Item 3 – Aboriginal consultation

OEH provides the following recommendation in relation to Aboriginal consultation:

- *Undertake additional Aboriginal consultation as per the Aboriginal cultural heritage consultation requirements for proponents (OEH 2010).*

Response

EnergyAustalia supports the recommendation which is included in the Statement of Commitments.

Item 4 – Additional site evaluation of Potential Archaeological Deposits (PADs)

OEH provides the following recommendations in relation to additional site evaluation of PADs:

- *Undertake a re-evaluation of Potential Archaeological Deposits (PADs) 3,4,5,6.*

Response

EnergyAustralia supports the recommendation and agrees with OEH that the re-evaluation is an opportunity to reengage with the Aboriginal community and to determine the scope and scale of any proposed test excavations. The statement of commitments has been updated accordingly.

Item 5 – Test excavations of PADs

OEH provides the following recommendations in relation to test excavation of PADs:

- *Develop and undertake a suitable test excavation method based on the results of the re-evaluation; and*
- *Develop appropriate salvage actions for the Heritage Management Plan.*

Response

EnergyAustralia supports the recommendation and has been included in the statement of commitments.

2.1.5 Roads and Maritime Services

Item 1 – Project support

The Roads and Maritime Services does not object to the Approved Project and makes no further submission to the proposed modification.

Response

The advice is noted.

2.1.6 WaterNSW

Item 1 – Recommendation

WaterNSW in their response recommends that the following conditions of the Approved Project be amended as follows:

- *'SCA' replaced with 'WaterNSW' throughout the conditions of approval;*
- *Condition 2.19 updated to include the names of the watercourses to be crossed (ie. Pipers Flat Creek, Thompsons Creek, Irondale Creek and Winters Creek); and*
- *Condition 2.37 updated to include WaterNSW as an agency to be consulted in the preparation of the riparian restoration / revegetation works.*

Response

EnergyAustralia supports the recommendation.

2.1.7 NSW Department of Industry Lands and Water Division

Item 1 – Recommendation

The NSW Department of Industry Lands and Water Division recommends that the following plans be updated in accordance with any approved modifications:

- Water management plan;
- Construction environment plan;
- Erosion and sediment control plan; and
- Operation environmental plan.

Response

EnergyAustralia supports the recommendation and confirms the plans will be updated in accordance with condition 6.2, 6.3 and 6.4 of the Approved Project.

2.1.8 John Holland Rail

Item 1 – Environmental protection licence

John Holland Rail (JHR) request that a condition of approval is provided which requires the proponent obtain a separate EPL for the construction and operation of the proposal in accordance with *Draft Amendments to Protection of the Environment Operations Regulation (Scheduled Activities) 2016*.

Response

EnergyAustralia notes the recommendation and confirms that an EPL would be obtained according to the requirements of the POEO Act. It is not considered appropriate to enforce this already legislative requirement by way of conditions of approval.

Item 2 – Lighting, external finishes and design

JHR request that a condition of approval is provided which '*require the use of red and green lights be avoided in all signs, lighting building colour schemes on any part of a building which faces the rail corridor'*.

Response

EnergyAustralia commits to developing the lighting and colour scheme in consultation with JHR to ensure the safety requirements for rail operations are appropriately considered. The statement of commitments have been updated accordingly.

Item 3 – Other

- Risk assessment / management plans and safe work method statements;
- Carrying out construction of rail infrastructure;
- Construction of structures;
- Excavation in, above, below or adjacent to rail corridors;
- Traffic management and closure of level crossings;
- Cranes;
- Stormwater management;
- Derailment protection and other potential impacts of adjacent development on railway; and
- Work access and possession.

Response

EnergyAustralia propose that these items are excluded from conditions of approval and remain the subject of contractual arrangements and track access agreements between John Holland Rail and EnergyAustralia or its contractors.

2.1.9 Transport for NSW

Item 1 – Infrastructure within the corridor

Transport for NSW (TfNSW) in their response, acknowledges support for the JHR submission and recommends the following condition be imposed:

> *The proponent shall enter into a licence on terms suitable to TfNSW in relation to the rail infrastructure being installed on TfNSW land. The licence will relate to the works being performed on the land and for the infrastructure to remain on the land. Terms of the licence may include provisions which allow TfNSW to terminate the agreement and remove the rail infrastructure at any time, require the Licensee to pay an annual licence fee, obligates the licensee to comply with certain safety requirements specifically in relation to accessing the rail corridor to perform maintenance on the rail infrastructure (e.g. engaging rail protection officers) etc. The licence for the works will require the applicant to hold relevant levels of insurance, and bank guarantees.*

Response

Whilst EnergyAustralia accept the requirement to enter into a licence agreement with TfNSW, it is preferred to exclude the requirements from the conditions of approval and for them to remain the subject of licencing arrangements between the two parties.

2.2 Part C - Response to Public Feedback

One objection was received from a member of the public during the exhibition period. The issues raised in the submission and response is provided below.

Item 1 – Property Value.

An assessment of the impact to property value associated with the Approved Project was undertaken in the *Western Rail Coal Unloader Environmental Assessment* Sinclair Knight Merz, April 2007 (Original Environmental Assessment) and the *Western Rail Coal Unloader Submissions Report* Sinclair Knight Merz, August 2007 (Submissions Report). The Original Environmental Assessment concluded that '*the visual, air quality and noise impacts would be effectively managed and as a consequence, there is no reason to expect any change in property values in the area*'.

The proposed modification does not increase the scale of the Approved Project or relative environmental impact. Therefore, with the proposed management measures, it is unlikely that the modification will have an unfavourable impact to property values.

Item 2 – Employment and loss of jobs at Springvale if bringing coal from other localities.

It is anticipated that up to 150 local jobs will be generated during construction and further jobs created during operation of the facility (for example, maintenance staff and train drivers).

The Approved Project and proposed modification will not directly result in a loss of jobs at Springvale mine as it is EnergyAustralia's intention to continue to source coal from Springvale mine and to source coal from local areas in the future if local coal supplies are available. The Approved Project is required to secure coal supplies for the continued operation of Mount Piper Power Station, in the event that local coal is not available.

The employment benefits associated with the proposed modification are consistent with the Original Environmental Assessment.

Item 3 – Noise Levels

A noise assessment associated with the proposed modification was carried out to quantify the noise impact at surrounding receivers as provided in Appendix 5 of the of the Environmental Assessment. In summary, the assessment concluded:

- Predicted noise levels for general construction activities are expected to meet the noise management levels at all receivers except at one (R5, the project related receiver on property owned by EnergyAustralia). For a limited time, when rail tamping is performed during construction, noise management levels at two receivers (project related R5 and R4a) may be exceeded;

- Predicted operational noise levels from the rail loop are demonstrated to comply with the RING noise trigger levels at all residential receivers for all periods; and

- Night time operations do not exceed the maximum noise level screening criterion, and as such sleep disturbance is not expected.

The Original Environmental Assessment gave consideration to train horn noise, bunching and stretching wagons and wheel squeal. It was noted that sensitive receivers near to the proposed coal unloader may experience noise increases above existing levels despite complying with the relevant noise criteria.

As such a noise validation monitoring assessment will be carried out to confirm noise emissions from site and compliance with relevant criteria. The results would be used to inform community engagement and the provision of any additional noise mitigation controls.

Overall there is expected to be a reduction in noise impact during both construction and operation associated with the proposed modification given the reduced fill requirements for embankment construction and the reduced coal throughput and therefore fewer train movements.

Item 4 – Visual Impact

It was concluded in the Original Environmental Assessment that the visual impact of the proposed railway loop, coal unloader and coal conveyor would be high. Those most affected would be the Premier Farms property and users of the Pipers Flat Road, as these receivers would experience changes to the visual environment in the foreground. Other minor visual impacts may be experienced by those receivers south of Pipers Flat Road whom have limited views of the proposed coal unloader.

An assessment of the visual amenity in relation to the proposed modification has been undertaken and is contained in Section 5.6 of the Environmental Assessment. Whilst there will be a visual impact associated with the proposed modification, it is expected to be less than that associated with the Approved Project. The proposed modification enables the design of the rail loop to fit more naturally with the contours of the landscape and is less visually obtrusive (given a reduced rail embankment height, located further from Pipers Flat Road and removal of provisioning facility and other buildings).

As part of the Approved Project, the visual impacts will be mitigated by appropriate selection of colour schemes to blend with the natural background and landscape planting and visual screenings.

Item 5 – Air Quality / coal dust

Section 5.4 of the Original Environmental Assessment provides an air quality assessment giving consideration to the main air pollutant sources. This includes earthworks during construction, emissions from locomotives, unloading and transport of coal and refuelling and sanding of trains. The air quality assessment concludes:

- Air quality impacts during construction could be managed within the identified site specific criteria with the implementation of dust mitigation measures; and

- Air quality impacts during operation will not exceed project specific air quality criteria at nearby receiver locations and the impacts would be low.

Both construction and operational air quality impact associated with the proposed modification are expected to be less than the Approved Project. During construction there will be a reduction in fill material by approximately 500,000m^3. During operation there will be a reduced coal throughput per annum by almost half, removal of a transfer station and provisioning facility for refuelling and sanding of trains.

Appendix 7 of the Environmental Assessment contains an air quality assessment of the proposed modification. In summary, the assessment concludes that the proposed modification is estimated to result in a reduction in total dust emissions generated during the construction and operational phases of the proposal.

It is proposed that the air quality mitigation measures will include a construction air quality management plan, construction and operational air quality monitoring, enclosure of the coal unloader, installation of a dust suppression system and dust extraction system at the coal unloader.

3.0 REVISED STATEMENT OF COMMITMENTS

3.1 Statement of Commitments

The statement of commitments have been updated to incorporate a number of the items raised in the submissions as provided in Table 2.

Table 1. Statement of commitments

CONSTRUCTION	
Noise and Vibration	• The Construction Noise Management Plan shall consider application of the following measures during rail tamping: - where possible the use of localised mobile screens or construction hoarding around plant to act as barriers between construction works and receivers; - operating plant in a conservative manner (e.g. no over-revving, shut down when not in use, and be parked/started as far as practically possible away from residential receivers); - consider the use of the quietest suitable rail tamper available; - avoid the use of noisy plant/machinery working simultaneously where practicable; and - utilise project related community consultation forums to notify residences within close proximity of the timing and duration of rail tamping activities.
Heritage	• A program of archaeological subsurface testing will be prepared for potential archaeological deposits (PADs) that will be directly impacted by the project. The program will: - re-evaluate PADs 3, 4, 5 and 6 and assess the nature and significance of any Aboriginal cultural material present at each location; - include a suitable test excavation method and salvage actions based on the results of the re-evaluation; and - the salvage and archaeological investigation will be undertaken in consultation with the local Aboriginal community. • In order to avoid inadvertent impacts to sites or parts of sites, identified in the project area, that will not be impacted will be fenced during construction works and their location placed on project maps as a no-go zone. • Consultation will continue with the relevant Aboriginal community as required in accordance with the *OEH Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. • In the event that artefacts of indigenous heritage significance are uncovered during the course of construction activities, works in the immediate area will cease, OEH would be notified and expert advice sought from an appropriately qualified professional.
Flora and Fauna	• Fifteen nest boxes of a variety of types and sizes will be installed in remnant vegetation adjacent to the rail loop as supplementary habitat prior to tree clearing to mitigate the removal of hollow bearing trees. • No go areas for contractors will be established and clearly identified on the ground along creeks and treed areas to avoid unnecessary vegetation and habitat removal. • During clearing of mature trees, an ecologist or appropriately trained person will be present to check any trees felled for wildlife inhabiting those trees.

	• Designated laydown and stockpile areas, compound sites and access routes will be identified and established in areas of cleared and degraded land, where practicable, to minimise the overall impact of the Project and avoid unnecessary vegetation and habitat removal. • Appropriate weed management strategies would be implemented during construction to ensure they are not spread throughout the study area and particularly into areas of remnant vegetation adjacent to the proposal area. • Fallen logs encountered within the proposed disturbance footprint and felled timber would be relocated to areas of retained remnant vegetation or other suitable long term habitat areas. • Creek crossing structures, where required, would be designed generally in accordance with *Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterways Crossings,* 2003 so as not to impede fish passage. Where culverts are used the base of the culvert will be positioned at or below the creek bed. • A section of Pipers Flat Creek, adjacent the Project area, would be restored by reinstating riparian vegetation and providing connectivity along the creek for movement by terrestrial and aquatic flora and fauna. • Revegetation of Pipers Flat Creek and surrounding areas would use native flora, where possible, which occur in the local area and are adapted to the local conditions. Plants and seeds used in revegetation works would be preferentially sourced from local provenance, where possible. • Targeted surveys will be conducted in the rail loop realignment and the conveyor belt corridor for threatened flora species with the potential to occur on site during appropriate survey periods as identified in Bionet. • Any threatened flora to be impacted will be quantified, and an appropriate offset provided as part of the compensatory habitat package required by condition 2.38.
Waste Management	• A Waste Management Plan (WMP) would be prepared and implemented. This would include: - Management of construction waste materials including correct orders, use of recycled material where practicable and reuse or appropriate disposal of surplus materials; - Waste for disposal would be removed by a licensed waste contractor and disposed of at a licensed landfill facility; - Use of spoil material on site or appropriate disposal when this is not possible; and - Appropriate treatment and disposal of green wastes, sewage and domestic wastes.
OPERATION	
Traffic	• Potential traffic impacts from the operations would be managed by minimising access to the site to Project related vehicles.
Air quality	• Restrict Project related traffic to defined roads. • Maintain low vehicle speeds on unsealed roads (e.g. 40km/h). • Ensure no incineration or burning of any material on the premises. • Prompt action would be taken to extinguish any fire. • Equipment will be maintained to ensure the best environmental performance in terms of air emissions.

Hydrology	• Appropriate engineering design and civil works for infrastructure located in natural waterways will be applied to ensure any permanent and intermittent water flows are not impeded and the site is free draining. • Refinement of the 2D model will be undertaken during the detailed design of the project. This will be used to refine the sizing and location of flood relief structures for Pipers Flat Creek. The sizing of the openings will be designed to minimise the need for armouring.
Water Quality	• A water detention basin will be constructed to capture and treat water from the washdown and dust control areas at the unloader. Water from the detention basin will be recycled, used for irrigation or discharged offsite to the creek. • Sufficient water quality monitoring would be undertaken to ensure that the water quality management devices on site are functioning as expected. The frequency of maintenance would be determined from the water quality monitoring. • Exposed surface areas would be revegetated as soon as practicable and these areas maintained during the life of the project. The vegetation program would include grassing of the railway embankments to stabilise the batters against erosion. To assist in managing runoff from the grassed embankments, cut drains and toe drains will be installed along the foot of the embankment. Runoff from these areas will be directed through flow retardation areas and into the creek at specified locations. • Coal spillage would be contained, barriers put in place between spillage and the creek system and manual clean up processes implemented. • Sufficient protective barriers are in place within proximity to the creek systems to ensure any coal spillage from stationary trains parked over the creeks or otherwise does not enter the creek systems.
Noise and Vibration	• General operational noise emissions will be controlled by implementing appropriate enclosure design for equipment within the dump hopper building. The dump hopper building itself would also require acoustic design input to ensure noise emissions are minimised. • Take up rollers for the conveyors and coal transfer towers will be designed within acoustic enclosures for drive motors so as to reduce the transmission of noise from equipment and operations to the external environment. In addition, the use of 'low-noise' rollers for the conveyor system will be evaluated. • To reduce the likelihood of rail/wheel noise, the inclusion of wooden sleepers, track ballast, rail head profiling and cambering of the track wold be considered in the design. The provision for trackside lubricators will be incorporated in the project design. • A one-off noise validation monitoring assessment will be undertaken to quantify emissions from site and to confirm emissions meet relevant criteria will be completed.
Waste Management	• Identify opportunities for sustainable waste management practices, where practicable, including for example reducing materials being brought onto the site, reuse of wastes where practicable and recycling.
Water Consumption	• Identify opportunities to minimise water consumption, where practicable such as the re-use of washdown water and Envirocycle effluent for irrigation systems.

Emergency Response	• An Emergency Response and Incident Management Plan (ERIMP), or equivalent, would be prepared to ensure incidents are handled promptly and safely. The ERIMP would outline the appropriate emergency response equipment that would be provided, the mandatory training requirements, the emergency response procedure and the responsibilities of site operators. • Appropriate measures to store and manage fuels and oils will be adopted as required. Spill kits will be made available and appropriately located and accessible to respond to accidental spills in the Project area.
Visual	• The lighting and colour scheme will be developed in consultation with JHR to ensure the safety requirements for rail operations are appropriately considered.