Centennial Coal
Fassifern

100 Miller Road
Fassifern NSW 2283
PO Box 1000
Toronto NSW 2283 Australia

T: 61 2 4935 8960
F: 61 2 4959 5299
E: info@centennialcoal.com.au
W: www.centennialcoal.com.au

2 August 2019

Mr Paul Freeman
Team Leader
NSW Department of Planning, Industry & Environment
Planning and Assessment
GPO Box 39
Sydney NSW 2001

Dear Mr Freeman

Re: Lidsdale Siding MOD 1 – Response to Submissions

Please find attached a response to the submissions received during the public exhibition period of the Lidsdale Siding MOD 1 Environmental Assessment.

Please contact me on my mobile 0407 207 530 if you have any questions or require any further information in regards to this matter.

Yours sincerely

James Wearne
Group Approvals Manager

Attached:

- Attachment A – Lidsdale Siding MOD 1 Response to Submissions

Appendix A

Lidsdale Siding MOD 1 – Response to Submissions

Table of Contents

1. Introduction

Ivanhoe Coal is seeking to modify the Lidsdale Coal Loader Project development consent 08_0223 to allow for:

- Receival and unloading of one coal laden train (nominal net tonnage of up to 3,900 tonnes (t) per train) each day (Monday to Saturday between 7:00 am and 6:00 pm, and Sunday between 8:00 am and 6:00 pm); and
- Transfer of coal received via rail to the overland conveyor for dispatch to the Western Coal Services Project.

This will require modification of the train loading facility to allow for the unloading of coal and also the construction of temporary surface facilities, including a conveyor system between the existing under-rail sump, stockpile area and existing overland conveyer.

It is proposed that these activities will only operate during emergency situations when coal stockpiles at Mount Piper Power Station (MPPS) are forecast to decline below 400,000 t for an extended period. An indicative trigger action response plan (TARP) has been developed to define the emergency situations when rail unloading activities will be required at the facility.

It is proposed that a maximum of one coal-laden train will be received and unloaded on any given day during emergency situations. Coal-laden train receival and unloading will not occur on the same day as approved loading activities and does not require an increase to the currently approved coal handling rate at the facility of 6.3 Mtpa.

The proposed modification will allow Ivanhoe Coal to provide an alternative source of coal of suitable quality to MPPS to supplement coal supply shortfalls from Springvale Mine. If no emergency coal supply provisions are put in place to address potential coal supply shortfalls, there is a risk that declining stockpiles at MPPS will impact the efficiency of operations at MPPS and threaten the reliable supply of electricity to NSW.

An environmental assessment was prepared to support the modification application. The environmental assessment was placed on public exhibition from 10 July 2019 until 23 July 2019 inclusive.

2. Summary of Submissions

Six submissions were received during the public exhibition period for the environmental assessment. One submission was received from a local community member in support of the project. Five submissions were received from public authorities being:

- Division of Resources and Geosciences
- Environment Protection Authority (EPA)
- Lithgow City Council
- Transport for NSW (TfNSW); and
- WaterNSW.

Further issues were raised by the Planning and Assessment Division within the Department of Planning, Industry and Environment in correspondence dated 26 July 2019. AA supplementary submission from WaterNSW was provided by email on 1 August 2019.

No objections to the project were received.

3. Consultation

Since the submission of the environmental assessment, the following consultation has been undertaken:

- Site visit to the Lidsdale Siding and the Springvale Coal Services Site with representatives from the Planning and Assessment Division within the Department of Planning, Industry and Environment, the Environment Protection Authority and Lithgow City Council on 17 July 2019.
- Site visit to the Lidsdale Siding with representatives from WaterNSW on 31 July 2019.
- Meeting with TfNSW on 1 August 2019.

In email correspondence from WaterNSW dated 1 August 2019, a recommendation was made that before the new construction work starts, silt in the dirty water dam shall be removed to manage the water on the site. Ivanhoe coal will ensure the dirty water dam is cleaned out and desilted in accordance with existing maintenance procedures, prior to the commencement of construction activities on site.

4. Response to Submissions

A detailed response to the submissions received during the public exhibition period is provided below.

4.1. Planning and Assessment Division

Issue: Explain how coal stockpile shortfalls at Mount Piper would be forecasted.

Response: Coal stockpile shortfall forecasts are based on a combination of coal supply and demand requirements that take into consideration a number of factors that may influence these aspects.

Issue: Justify setting the trigger level of 400,000 tonnes at Mount Piper and provide information if available on existing supplies and stockpiles.

Response: Mount Piper Power Station typically uses around 300kt of coal per month for electricity generation. A stockpile capacity of 400kt is around 5-6 weeks worth of coal supply for the power station. This is considered a minimum level to be maintained in order to ensure continuity of supply to cover typical short term interruptions that may occur from time to time (e.g. conveyor failure, short term mine problem, or short term power station receival system failures). Sustained forecasts below this level are considered undesirable for power station operational continuity, and hence state wide energy security.

Current stocks are just under 500kt, but falling rapidly due to ongoing shortfalls in supply from the Springvale Mine. Mount Piper Power Station operations are currently constrained, but the current outlook is for further constraints to be required (e.g. moving to one unit operation). Even with this constraint management measure in place, stockpile levels are predicted to fall under 400kt by the end of October this year when the new longwall is due to commence operations. With this forecast, the proposed TARP to install and operate the temporary rail unloading infrastructure would currently be triggered.

Issue: The necessary infrastructure to undertake coal unloading would be assembled and disassembled as required. Describe what is involved in undertaking this activity and consider whether these activities would meet relevant environmental impact criteria within the existing consent and/or how impacts would be managed.

Response: As this is a temporary system composed of hired equipment, the assembly and disassembly of the infrastructure relates only to the initial mobilisation and set-up of it, and the ultimate disassembly and de-mobilisation of it offsite after the railing campaign has finished.

The assembly and disassembly would occur in two discrete time periods at the beginning and end of each railing period and nominally take approximately four to six weeks. These activities would occur during daylight hours, from 7 am to 6 pm Monday to Friday, and 8 am to 1 pm on Saturdays in accordance with the standard construction hours outlined within the Interim Construction Noise Guideline (DECC 2009).

The assembly process will involve:

- Transport of conveyor equipment to site;
- Offload with mobile cranes to laydown area adjacent existing coal stockpile area;
- Levelling stockpile area to allow for installation of temporary infrastructure;
- Lifting system components into place by mobile cranes;
- Trenching of services; and
- Weld up of chute sections.

The disassembly process would simply be in reverse.

Construction noise would be limited to:

- Transportation vehicles arriving and leaving site;
- Mobile crane operations;
- Mobile equipment for minor civil works including levelling and trenching (Dozer or Front End Loader);
- Hand-held power tools and in-situ welding (rattle guns and welding equipment).

Impacts from construction noise are considered to be negligible with no receptors expected to be noise affected as defined by the Interim Construction Noise Guideline (DECC 2009).

Monitoring will be conducted during assembly and disassembly stages to confirm residents are not noise affected by the proposed construction noise activities. Where the measured LAeq (15 min) is greater than the noise affected level, Ivanhoe Coal will review construction activities and apply all feasible and reasonable work practices to meet the noise affected level. Any complaints received during construction activities will be investigated and followed up.

Consider the scale of greenhouse gas emissions associated with the modification, in comparison with the original assessment.

Table 1 below summarises the greenhouse gas emissions calculated in 2013 by SLR Consulting for the current approved Lidsdale Coal Loader Project.

Table 1 – Assessed Greenhouse Gas Emission Volumes for the Lidsdale Coal Loader Project

	Approved Operations
Scope 1	
Diesel Combustion (on-site)	162

	Approved Operations
Sub Total	***162***
Scope 2	
Electricity Consumption	1,074
Scope 2 Sub Total	***1074***
Scope 1 and 2 Combined Sub Total	***1,236***
Scope 3	
Diesel Combustion (on-site)	12
Diesel Combustion (off-site)	1,970
Electricity Consumption	205
Employee Travel	5
Scope 3 Subtotal	***2,193***
Total Scope 1, 2 and 3	**3429**

The Lidsdale Siding is approved to operate 24 hours a day, 7 days a week. Operational restrictions imposed on the operations include no more than 7 laden trains leave the site each day; and no more than 5 laden trains leave the site each day, when averaged over a calendar year.

Historical operational levels at the Lidsdale Siding since 2013 are presented in **Table 2** below. As can be seen by the data presented in **Table 2**, the Lidsdale Siding has not been operating at capacity for a number of years. As a result, the assessed and approved annual greenhouse gas emissions from the operation would not have been realised.

Table 2 - Historical Operational Levels at the Lidsdale Siding Since 2013

Year	Tones Exported	Trains Departing
2013	1,210,993	356
2014	1,828,198	538
2015	1,539,005	453
2016	1,032,586	303
2017	573,603	167
2018	9,912	3
2019	3,457	1

As part of the modification application, it is proposed that a maximum of one coal-laden train will be received and unloaded on any given day during emergency situations. Coal-laden train receival and unloading will not occur on the same day as approved loading activities. As such, the operational levels at the Lidsdale Siding will be less than those operational levels assessed as part of the 2013 Lidsdale Coal Loader Project Greenhouse Gas Assessment. Consequently, greenhouse gas emissions from the receipt of coal at the Lidsdale Siding by rail will result in less greenhouse gas emissions than should rail loading activities occur as is currently approved.

Greenhouse gas emissions associated with the installation and operation of additional temporary conveyors to handle coal unloaded from the trains will be offset by the fact that the existing conveyor systems to transfer coal to the rail loading bin at the Lidsdale Siding will not be operational during unloading activities.

As a result, it is considered that the greenhouse gas emissions from the Lidsdale Siding operations as proposed will be less than those greenhouse gas emission levels assessed and approved by the original Lidsdale Coal Loader Project Greenhouse Gas Assessment.

Issue: Describe the social and economic consequences associated with the base case scenario (i.e. no project).

Response: Mount Piper Power Station typically uses around 300kt of coal per month for electricity generation. During coal supply shortfalls, trucking does not supply the volume of coal that is required to operate MPPS at normal capacity. Centennial's short term solution to seek approval for 25 trucks per day means that over a seven day period the maximum volume of coal that can be delivered to the Mount Piper Power Station is only 5,250 tonnes (each truck carries approximately 30 tonnes). In comparison, each train carries approximately 3,900 tonnes.

Mount Piper Power Station is currently unable to source coal directly from other local mines or more generally other coal mines within NSW as no other mines have approval to transport coal by road direct to the Mount Piper Power Station and Mount Piper Power Station does not currently have a rail unloading facility to enable coal to be delivered by train.

Trucking coal increases impacts on the road network and surrounding communities due to traffic noise, adverse air quality, and risk to safety of other road users and the potential for congestion. While these matters can be mitigated (e.g. covering loads, utilising haul roads where possible, and driver education) the solution simply does not meet the volumes of coal required by the Mount Piper Power Station.

Rail transport is considered a more appropriate option as it can deliver the quantity of coal required, does not pose the risks associated with trucking and utilises infrastructure (Lidsdale Siding) that since its upgrade, has minimal impact on surrounding and nearby residents.

The Economic Effects Analysis (Aigis Group May 19) states that "[t]he relatively brief duration of the proposed modification, its limited scale, the application of existing mitigation measures and the introduction of additional mitigation initiatives collectively act to reduce the likely effects on the community and other stakeholders. Taking these matters into consideration, on balance it is assessed that local/regional benefits and costs are unlikely to be material in scale or duration. A material broader benefit will be supported by the proposed modification, to the extent that it will secure fuel supply for generation of 15% of the State's electricity requirement".

If the modification to Lidsdale Siding is not approved, Centennial would need to seek additional approvals to further increase trucking from surrounding operations (e.g. Clarence Colliery). Further modifications would be required if Clarence Colliery could not provide the required quantity of coal

(i.e. both to increase trucking and permitting the transport of coal by roads from sources further afield).

Should these approvals not proceed, coal stockpiles at Mount Piper Power Station would decline resulting in the Mount Piper Power Station having to reduce electricity generation putting power supplies to NSW residents and business at risk. This is of a particular concern during summer months when electricity demands are greatest.

The proposed Lidsdale Siding modification allows for a supplementary supply of coal to be delivered to the Mount Piper Power Station at a volume that will maintain coal stockpiles required for the ongoing operation of Mount Piper Power Station. Without a reliable supply of coal, electricity generation and employment in the Lithgow region are jeopardised and energy security for the community and business both at a local and state wide level are threatened.

4.2. Division of Resources and Geoscience

Issue: The Division has no concerns to raise with the proposed modification of the Lidsdale Siding Coal Loader.

Response: Noted

4.3. Environment Protection Authority (EPA)

Issue: The noise report has not provided an assessment of noise levels against the EPL noise limits nor the existing Project Approval. The noise report should be updated to assess the predicted noise levels against the requirements of the EPL.

Response: As can be inferred from the information presented in the Noise Impact Assessment, predicted noise levels for current approved or proposed operations are expected to exceed current EPL or development consent criteria. A number of management activities and restrictions have been proposed to further reduce noise levels from activities proposed by the modification including:

- Limited unloading and associated coal handling activities to day time periods only;
- Only operating a single front end loader or dozer at the coal stockpile; and
- Operating trains in a specialised method with the aim to reduce noise emissions from wagons and eliminate noise from wagon stretch or come together/bunching.

Furthermore, the proposed train unloading activities will only be undertaken during emergency situations when coal stockpiles at the Mount Piper Power Station are forecast to fall below 400kt for two consecutive months in accordance with a proposed Trigger Action Response Plan. As is outlined in the environmental assessment, rail unloading activities will continue until coal stockpiles at he Mount Piper Power Station are greater than 400kt and the forecast coal stockpile is likely to remain above 400,000 t for a six month period. If no emergency coal supply provisions are put in place to address potential coal supply shortfalls, there is a risk that declining stockpiles at MPPS will impact the efficiency of operations at MPPS and threaten the reliable supply of electricity to NSW.

Issue: Predicted noise levels from the proposed operations are above the EPL limits, however the report has not considered additional mitigation measures. Whilst it is understood that noise levels for unloading coal trains may be lower than the loading operations, the predicted levels for the unloading activities are still above the EPL limits. The proponent should identify all reasonable and feasible noise mitigation measures where noise levels are predicted to exceed the EPL limits. If after all reasonable and feasible mitigation measures have been implemented, noise levels remain above the

EPL limits, an assessment of residual impacts should be undertaken in accordance with Section 4 of the Noise Policy for Industry (NPfI) (EPA, 2017).

Response: Section 4 of the noise assessment details proposed noise mitigation and management measures including:

- Operating trains in a specialised method with the aim to reduce noise emissions from wagons and eliminate noise from wagon stretch or come together/bunching.
- Not operating the proposed additional infrastructure (conveyors and reclaimers) concurrently with the existing material handling infrastructure.
- Only carrying out proposed operations during the daytime period only
- Restricting mobile equipment use to a single dozer or front end loader.

Reasonable and feasible noise mitigation options have been considered and are continually being investigated however, due to the proximity of sensitive receptors to the site and the nature of the noise (being largely from train locomotives), reasonable, feasible and effective noise mitigation options are limited and no further feasible or reasonable mitigation measures have been identified at this stage.

Issue: The existing premises noise emissions in Table 2 of the noise report are inconsistent with the predicted noise levels in the 2012 upgrade noise report. No explanation is provided in the noise report for this discrepancy. The proponent should either provide a justification or update the noise predictions accordingly.

Response: It is difficult to provide an accurate direct comparison with the predictions provided in the 2012 upgrade noise report (Hatch). Subtle differences in assumed source locations have the potential to have a large impact on predicted levels due to the close proximity of sources to the relevant receivers. In addition, the 2012 upgrade noise report (Hatch) used estimated sound power levels since the equipment, at that stage, was proposed.

The predicted noise levels provided in the recent EMM report have been validated by recent measurements undertaken on site (March 2019) and are based on a likely worst-case location of noise sources (e.g. trains) on the site.

Issue: The site has been operating in its current configuration since 2015, however the noise report has relied on the 2012 upgrade noise report. Since the 2012 upgrade noise report was been completed, there have been several assessments of the site, including monthly noise monitoring for 4 years, a noise audit, regional noise modelling for Centennial operations and a sound power level survey. It is considered that these activities would provide a better understanding of the actual noise emissions compared with the predictive assessment from the 2012 upgrade noise report. The proponent should provide a justification for not appearing to consider this information in the noise report, or the report should be updated in consideration of this information.

Response: The EMM report has not relied on the noise levels presented in the 2012 report prepared by Hatch as part of the Lidsdale Coal Loader Project. As per the above comment, predicted noise levels provided in the recent EMM report have been validated by recent measurements undertaken on site (March 2019). In calibrating the noise model reference was also made to measurements undertaken by Global Acoustics.

Issue: Since the premises is an operating noise source and the proponent has relied on the difference between the existing and proposed operational noise levels to define the impact, the proponent

should demonstrate that the noise model is valid for the existing site. This could be done by comparing the existing measured noise emission from the site with predicted levels for the same scenario at reference points.

Response: This has, in essence, been done in validating the noise levels as per EMM measurements on site to inform the noise model developed.

Issue: Chapter 3 of the noise report states that the site does not have a history of complaints. However, the site does have a history of exceedances of EPL limits, reporting exceedances in 2017, 2016 and 2015. The noise report should be updated to address this history of non-compliance and identify reasonable and feasible noise mitigation measures as part of this modification.

Response: The upgrades to the coal loader in 2015, following determination of the Lidsdale Coal Loader Project, resulted in significant improvements to the amenity of the surrounding community as a result of an increase in the level of automation of coal handling and train loading activities.

Ivanhoe Coal acknowledges a history of exceedances of the noise criteria have occurred despite these significant upgrades being implemented. As a result of noise exceedances, Ivanhoe Coal has undertaken rail loading activities during daylight hours only to minimise the impacts of its operations on the surrounding community. Rail unloading activities proposed as part of this modification are also only proposed to occur during daylight hours only.

Reasonable and feasible noise mitigation options have been considered and are continually being investigated however, due to the proximity of sensitive receptors to the site and the nature of the noise (being largely from train locomotives), reasonable, feasible and effective noise mitigation options are limited and no further feasible or reasonable mitigation measures have been identified at this stage. Rather, Ivanhoe Coal continues to focus on improving noise amenity through the operations of rail loading and the proposed unloading activities, to minimise impacts from noise. A submission by a nearby business to the Lidsdale Siding made during the public exhibition period of the environmental assessment highlights the communities acceptance of the operations undertaken at the Lidsdale Siding since the 2015 upgrades to the facility were completed.

Issue: The report does not provide sufficient information on how the predicted noise levels were calculated, the source levels used, the type of noise sources, the number and location of equipment operating and calculation methods used in the predictions. The noise report should be updated to include this information.

Response: Noise modelling was based on three-dimensional digitised ground contours of the surrounding land. Noise predictions were carried out using ISO9613 algorithms in Brüel and Kjær Predictor noise prediction software. ‘Predictor’ calculates total noise levels at assessment locations from the concurrent operation of multiple noise sources. The model has considered factors such as:

- the lateral and vertical location of plant;
- source to assessment location distances;
- ground effects;
- atmospheric absorption; and
- topography of the site and surrounding area.

Plant and equipment have been modelled at locations and heights representing activities during typical operations. Due to the proximity of receivers to the site the assumed location of the train can have a considerable effect on the predicted noise emission levels. Hence, the train has been modelled at several locations to consider the potentially worst-case scenario for each receiver.

EMM conducted a site visit in March 2019 for the purpose of validating train noise emission predictions. Sound power levels utilised in the noise model are summarised as follows:

- Dozer or FEL (113dBA)
- 2x conveyor drives (98dBA/item)
- Transfer point (88dBA)
- Conveyors (75dBA/m)
- Train (wagons and 2 locos) (119dBA)

Issue: The report does not provide information on how meteorological conditions have been accounted for. The noise report should provide an explanation of how meteorological conditions have been accounted for in accordance with NPfI Section 3 and Fact Sheet D.

Response: Calm met conditions have been modelled since the focus of the report was on predicting the change in noise levels between current approved and proposed operations only. If worst-case met conditions are assumed, predictions for both current approved and proposed operations will increase.

Issue: An assessment for annoying characteristics using NPfI Fact Sheet C should be included.

Response: It is not anticipated that any modifying factors would apply and as such a detailed assessment of whether modifying factors should apply was not considered necessary.

4.4. Lithgow City Council

Issue: Council considers the Environmental Assessment adequately highlights the relevant issues, and has no objection to the project subject to Council's original conditions remaining on the consent.

Response: Noted

4.5. Transport for NSW (TfNSW)

Issue: Lots 1 & 2 DP 252472, being part of the project site, is owned by Rail Corporation New South Wales (RailCorp) and is currently leased to the Proponent in accordance with Deed of Assignment dated 24 September 2004. Such assignment to the Proponent was approved by State Rail Authority of NSW, being the predecessor in title of RailCorp that the Proponent duly performs the terms of Registered Lease Q596012, in particular, that the Lessee must obtain the Lessor's approval prior to any works in relation to alteration, addition or removal or replacement of any building structure fixture or improvement. Accordingly, TfNSW will seek to uphold that the subject application must be reviewed and approved by RailCorp as the Lessor.

Response: Ivanhoe Coal, as operators of the Lidsdale Siding, will engage with RailCorp and John Holland Rail in regards to the proposed activities to ensure compliance with the conditions of Registered Lease Q596012. Compliance with the conditions of the Registered Lease Q596012 is external, and in addition to, the requirements to obtain development consent under the Environmental Planning and Assessment Act 1979.

Issue: Considering the project site is adjacent to the rail corridors for the purpose of Clause 85 of the State Environmental Planning Policy (Infrastructure) 2007 (ISEPP), the subject application might trigger the need for concurrence in accordance with Clause 86 pf the ISEPP subject to the extent of the proposed excavation works.

Response: The project involves only minimal levelling of the existing coal stockpile area to establish a level surface for the installation of temporary infrastructure required to facilitate the transfer of coal on site. Minor trenching may be required to bury services.

Clause 86 of the ISEPP states:

1. *This clause applies to development (other than development to which clause 88 applies) that involves the penetration of ground to a depth of at least 2m below ground level (existing) on land:*
    a. *within, below or above a rail corridor, or*
    b. *within 25m (measured horizontally) of a rail corridor, or*
    b1. *within 25m (measured horizontally) of the ground directly below a rail corridor, or*
    c. *within 25m (measured horizontally) of the ground directly above an underground rail corridor.*

No trenching works or minor surface levelling works will result in ground penetration exceeding 2m below ground level. As such, Clause 86 of the ISEPP is not applicable to this modification application.

Issue: The proposed works of the subject application might involve an increase in the total number of vehicles or the number of trucks using a level crossing for concurrence in accordance with Clause 84 of the ISEPP.

Response: As detailed in the SEE, a traffic and rail impact assessment was prepared by Barnson (2012) as part of the EIS for the Lidsdale Siding Upgrade Project. The assessment addressed impacts associated with road and rail movements, including potential impacts at the Main Street and Brays Lane level crossing. The assessment concluded that queuing at the Main Street level crossing would be minimal; however, some upgrading to the current road line marking at this location was proposed to satisfy Australian Standard 1742.7-2007 Manual of uniform traffic control devices – Part 7: Railway crossings. The assessment also concluded that the potential for traffic queues at the Brays Lane level crossing would be minimal due to the low level of local traffic associated with this land. No additional train safety mitigation measures were recommended and the impact on the existing rail network was considered negligible. There are likely to be a number of light and heavy vehicle movements to and from the site during project civil works and plant establishment/mobilisation. Construction is estimated to take approximately four to six weeks, if all components are installed at the same time, once all temporary infrastructure has been delivered to site, with up to ten people required on-site during construction. Given the brief duration of these vehicle movements, no significant impacts on traffic flow or safety of major and local roads are anticipated as a result of the proposed modification

Clause 84 of the ISEPP states:

1. *This clause applies to development that involves:*
    a. *a new level crossing, or*
    b. *the conversion into a public road of a private access road across a level crossing, or*

c. *a likely significant increase in the total number of vehicles or the number of trucks using a level crossing as a result of the development.*

Traffic associated with the construction, operation and disassembly are not considered to be significant and will be less than those assessed as part of the 2012 Barnson traffic and rail impact assessment. As such, Clause 84 of the ISEPP is not applicable to this modification application.

Issue: is requested that a Response to Submission (RtS) be prepared by the Proponent to outline construction and demolition activities (if any) in detail relating to any work within the rail corridor and should also include the submission to JHR a Major Works Package, Risk Assessment/Management Plan and detailed Safe Work Method Statements for its review and/or comment in respect of each separable stage.

Response: All works are proposed within the privately operated Lidsdale Siding in accordance with the conditions of Registered Lease Q596012. No works are proposed within the rail corridor. As such the submission to JHR a Major Works Package, Risk Assessment/Management Plan and detailed Safe Work Method Statement for its review and/or comment in respect of each separable stage is not considered necessary.

Issue: Clause 86 of the ISEPP stipulates that the consent authority must not grant consent without consulting with the rail authority and obtaining concurrence consistent with clauses 86(2) – (5) in the event that the development involves the penetration of ground to a depth of at least 2m below ground level on land within 25m of a rail corridor. The EA states that minor excavation and levelling associated with footings/pads will be conducted to support construction for conveyors and stackers. However, it does not contain information detailing excavation in respect of the works proposed.

Response: The project involves only minimal levelling of the existing coal stockpile area to establish a level surface for the installation of temporary infrastructure required to facilitate the transfer of coal on site. Minor trenching may be required to bury services.

No trenching works or minor surface levelling works will result in ground penetration exceeding 2m below ground level. As such, Clause 86 of the ISEPP is not applicable to this modification application.

Issue: The RtS should include detailed information of excavation in respect of the proposed works. Note: If any construction activities involve 2 m below ground level within 25m from of the rail corridor, TfNSW will suggest a condition following the review of any material prepared as part of the RtS in accordance with Clause 86 of the ISEPP.

Response: The project involves only minimal levelling of the existing coal stockpile area to establish a level surface for the installation of temporary infrastructure required to facilitate the transfer of coal on site. Minor trenching may be required to bury services.

No trenching works or minor surface levelling works will result in ground penetration exceeding 2m below ground level. As such, Clause 86 of the ISEPP is not applicable to this modification application.

Issue: Clause 84 of the ISEPP 2007 states that the consent authority must not grant consent to development without the concurrence of the rail authority for the rail corridor if the development involves a likely significant increase in the total number of vehicles or the number of trucks using a level crossing. The EA does not contain information regarding the construction traffic in terms of its volume and its impact on the level crossings at Main Street and Brays Lane.

Response: As detailed in the SEE, a traffic and rail impact assessment was prepared by Barnson (2012) as part of the EIS for the Lidsdale Siding Upgrade Project. The assessment addressed impacts associated with road and rail movements, including potential impacts at the Main Street and Brays Lane level crossing. The assessment concluded that queuing at the Main Street level crossing would be minimal; however, some upgrading to the current road line marking at this location was proposed to satisfy Australian Standard 1742.7-2007 Manual of uniform traffic control devices – Part 7: Railway crossings. The assessment also concluded that the potential for traffic queues at the Brays Lane level crossing would be minimal due to the low level of local traffic associated with this land. No additional train safety mitigation measures were recommended and the impact on the existing rail network was considered negligible. There are likely to be a number of light and heavy vehicle movements to and from the site during project civil works and plant establishment/mobilisation. Construction is estimated to take approximately four to six weeks, if all components are installed at the same time, once all temporary infrastructure has been delivered to site, with up to ten people required on-site during construction. Given the brief duration of these vehicle movements, no significant impacts on traffic flow or safety of major and local roads are anticipated as a result of the proposed modification

Clause 84 of the ISEPP states:

> 2. *This clause applies to development that involves:*
>
> *d. a new level crossing, or*
>
> *e. the conversion into a public road of a private access road across a level crossing, or*
>
> *f. a likely significant increase in the total number of vehicles or the number of trucks using a level crossing as a result of the development.*

Traffic associated with the construction and disassembly are not considered to be significant and will be less than those assessed as part of the 2012 Barnson traffic and rail impact assessment. As such, Clause 84 of the ISEPP is not applicable to this modification application.

Issue: It is requested that the Proponent must prepare and provide JHR, as part of the RtS, with an assessment based upon the Australian Level Crossing Assessment Model in order to identify key potential risks regarding the level crossings at Main Street and Brays Lane respectively during construction and operation. In the event that such assessment identifies significant increases in the use of those level crossings, the Proponent may be conditioned to upgrade those level crossings in accordance with JHR's engineering standards in accordance with Clause 84 of the ISEPP. In addition, the relevant Council will also be requested to update the current Road Rail Interface Agreement to reflect the change to those level crossings in accordance with the Rail Safety National Law 2012.

Response: The impacts of the proposed modification on the level crossings at Main Street and Brays Lane as a result of the proposed modification will be less than those assessed and approved by the Lidsdale Coal Loader Project. The number of trains accessing the site, should the modification be approved will be one per day. Current approvals allow for up to 7 trains per day to access the site. The traffic associated with the construction, operation and disassembly of the temporary infrastructure is considered to be negligible and less than those impacts assessed by Barnson in 2012 as part of the Lidsdale Coal Loader Project Environmental Impact Statement. As a result, an assessment based upon the Australian Level Crossing Assessment Model in order to identify key potential risks regarding the level crossings at Main Street and Brays Lane respectively during construction and operation is not considered warranted for this modification application. No upgrades to these level crossings will be required as a result of this modification being approved.

Issue: It is not evident that neither JHR nor TfNSW were previously consulted on this modification application.

Response: A representative from Centennial Coal met with representatives from TfNSW on 1 August 2019 to discuss the proposed works at the Lidsdale Siding. Ivanhoe Coal will continue to engage with RailCorp and JHR in accordance with the requirements of the Registered Lease Q596012.

Issue: JHR advises that the notification boards do not exist within the CRN Standards, nor would such boards have any legitimacy under the CRN Network Rules and Procedures. JHR further advises that an external organisation cannot unilaterally determine an installation of the notification boards within the CRN rail land unless otherwise permitted in writing by the rail authority.

Response: The proposed operation of a notification board is an initiative developed in order to address concerns raised by the community regarding delays experienced at the level crossing on Main Street. The notification board would be installed and operated at the Lidsdale Siding to inform the surrounding residents of potential delays due to train arrivals. The Lidsdale Siding is operated as a private facility in accordance with Registered Lease Q596012. The operation of the notification board would not be within the Country Regional Network land.

Issue: The RtS should outline whether mobile cranes will be used in the airspace above the rail corridor during construction. The Proponent should be made aware of the use of cranes or Equipment must be in accordance with the AS 2550 series of Australian Standards, Cranes, Hoist and Winches, including AS2550 15-1994 Cranes – Safe Use- Concrete Placing Equipment.

Response: All works are proposed within the privately operated Lidsdale Siding in accordance with the conditions of Registered Lease Q596012. No works are proposed within the rail corridor. No mobile cranes will be used in the airspace above the rail corridor during construction.

Issue: The RtS should outline whether the existing stormwater management has adverse impacts on the rail corridor land and the rail infrastructure. It is requested that the Proponent to submit to JHR with a stormwater plan for review.

Response: The installation and operation of the temporary infrastructure for rail unloading activities at the Lidsdale Siding is all within existing operational areas that are serviced by the water management system under an approved Water Management Plan. The proposed modification will not change the existing water management system at the site and the water management system will continue to operate in accordance with the sites approved water management plan. As the modification does not result in any changes to the sites water management system, the modification will not have any adverse impacts on the rail corridor land and the associated rail infrastructure. The development of a stormwater plan for review by JHR is not considered necessary should the proposed modification be approved.

Issue: The subject railway line is currently covered under JHR's EPL. As such, the Proponent should ensure that its proposed modification does not have any adverse impacts on the JHR's EPL during construction and operation.

Response: The proposed modification will operate within the current assessed and approved limits for rail movements detailed within the Lidsdale Rail Loader Project Environmental Impact Statement. All rail movements will continue to operate within the constraints of the JHR EPL for the subject rail line.

As such, the proposed modification will not have any adverse impacts on JHR's EPL during construction and operation.

Issue: It is requested that the Proponent be conditioned to obtain from JHR and TfNSW that the proposed train operations are in accordance with JHR's Network Rules and Procedures.

Response: A Safety Interface Agreement between JHR and Centennial Coal is in place for the operations undertaken at the Lidsdale Siding. All operations undertaken at the Lidsdale Siding will be in accordance with the Safety Interface Agreement and Registered Lease Q596012. These agreements are in addition to the development consent issued under the *Environmental Planning and Assessment Act 1979* (EP&A Act). No additional conditions of consent are considered necessary regarding train operations a the Lidsdale Siding.

Issue: Prior to the issue of Construction Certificate, the Proponent must liaise with the relevant rail authority and JHR (TfNSW's agent for managing the CRN) and obtain approval with respect to the proposed works by way of submitting construction and demolition activities, if any, in detail relating to each work and the submission to JHR a Major Works Package, Risk Assessment/Management Plan and detailed Safe Work Method Statements for its review and/or comment in respect of each separable stage.

Response: As noted above, all works are proposed within the privately operated Lidsdale Siding in accordance with the conditions of Registered Lease Q596012. No works are proposed within the rail corridor. As such the submission to JHR a Major Works Package, Risk Assessment/Management Plan and detailed Safe Work Method Statement for its review and/or comment in respect of each separable stage is not considered necessary.

Issue: Prior to any excavation works on site, the Proponent must provide details of excavation in relation to the proposed works to the relevant rail authority and JHR (TfNSW's agent for managing the CRN) for its assessment.

Response: As noted above, the project involves only minimal levelling of the existing coal stockpile area to establish a level surface for the installation of temporary infrastructure required to facilitate the transfer of coal on site. Minor trenching may be required to bury services.

No trenching works or minor surface levelling works will result in ground penetration exceeding 2m below ground level.

All works are proposed within the privately operated Lidsdale Siding in accordance with the conditions of Registered Lease Q596012. No works are proposed within the rail corridor.

Issue: Prior to the proposed additional train operation, the Proponent must obtain approval from JHR and TfNSW in respect of the proposed train operations.

As noted above, the proposed modification will operate within the current assessed and approved limits for rail movements detailed within the Lidsdale Rail Loader Project Environmental Impact Statement. All rail movements will continue to operate within the constraints of the JHR EPL for the subject rail line. As such, the proposed modification will not have any adverse impacts on JHR's EPL during construction and operation.

4.6. WaterNSW

Issue: WaterNSW requests that the updated Erosion and Sediment Control Plan for the proposed construction works as part of this modification are referred to WaterNSW for comment.

Response: The installation and operation of the temporary infrastructure for rail unloading activities at the Lidsdale Siding is all within existing operational areas that are serviced by the water management system under an approved Water Management Plan. The Lidsdale Rail Siding Water Management Plan has recently been reviewed in consultation with relevant government agencies including WaterNSW. The Water Management Plan is currently being updated to take into consideration feedback received from the Department of Planning, Industry and Environment – Planning and Assessment Division. The Water Management Plan currently being revised is considered adequate to accommodate the changes in operations proposed by this modification.

Surface disturbance and other construction activities at the Lidsdale Siding are managed in accordance with the approach and guidelines outlined in the Centennial Coal Regional Water Management Plan and the Trigger Action Response Plan contained within Appendix E of the revised Lidsdale Siding Water Management Plan.

Should the modification application be approved, no further revisions to the Lidsdale Siding Water Management Plan or Centennial Coal Regional Water Management Plan are considered necessary.

Issue: Before the new construction work starts, silt in the dirty water dam shall be removed to manage the water on the site.

Response Ivanhoe coal will ensure the dirty water dam is cleaned out and desilted, in accordance with existing maintenance procedures, prior to the commencement of construction activities on site.