

**Department of Climate Change, Energy, the Environment  
and Water**



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**Subject: Snowy 2.0 Main Works Mod 3 – (CSSI–9687–Mod 3) – Modification Report**

Dear Joe Fittell

I refer to your request for advice sent on 11 August 2024 to the NSW Department of Climate Change, Energy, the Environment and Water- (DCCEEW) Water Group about the above matter.

Snowy Hydro is seeking to modify the Snowy 2.0 Main Works infrastructure approval to enable construction of an additional adit at Marica West to facilitate excavation of a section of the headrace tunnel through the Long Plain Fault Zone.

NSW DCCEEW Water has reviewed the Modification Report and has recommendations regarding water take and licensing, works on waterfront land and future groundwater modelling reports. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW Water Assessments at [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au)

Yours sincerely,

Rob Brownbill  
Manager, Water Assessments, Knowledge Division  
Department of Climate Change, Energy, the Environment and Water

## Attachment A

### Detailed advice regarding the Snowy 2.0 Main Works–Mod 3 (CSSI-9687) – Modification Report

#### 1.0 Water take and licensing

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##### 1.1 Recommendation – Prior to determination

Department of Planning, Housing and Infrastructure request the proponent to:

- Quantify the additional maximum annual site water demands for construction and operation of the project and the requirement for additional groundwater take or surface water take and any water licence requirements to meet these demands.
- Quantify the predicted increase in groundwater inflows for the modification activities based on water source in the relevant water sharing plan.
- Confirm if additional water entitlement is required only for the predicted increase in groundwater take of 40.1ML, or if entitlement still needs to be obtained for the approved project.
- Clarify the groundwater conditions for the steady state groundwater inflow stage shown in Table 8.2 of Appendix C (Groundwater impact assessment) and confirm if there is any ongoing groundwater take.
- Demonstrate sufficient water entitlement is held or can be acquired in the relevant water source/s to account for any predicted increases in water take and for any still required for the approved project.

##### Explanation

Insufficient information is provided to understand the potential for changes to the site water demands for the project and how these are to be met. The modification report refers to works and activities which are likely to require additional water supplies such as temporary construction areas, expansion of the accommodation camp and a new water treatment plant. The water volumes to meet these demands and the water sources have not been provided.

Section 3.2.1 of the Groundwater impact assessment (Appendix C) refers to two water sources being applicable to the Mod 3 area: the LFB Murray Darling Basin Groundwater Source and the LFB South Coast Groundwater Source. However, the predicted groundwater inflow volumes shown in Table 8.2 have not been apportioned to water sources.

Clarification is requested to understand the requirement and ability to obtain water entitlement for the project. Information that confirms if water entitlement needs to be obtained for the existing project in addition to the modification and any challenges in obtaining this entitlement will assist in addressing this issue.

It is unclear if the steady state groundwater inflow (equilibrium) represented in Table 8.2 is due to no ongoing inflows, equal inflows and outflows, a lower groundwater level, a lined tunnel or other scenario. Further detail is requested to understand the groundwater conditions and interaction with the adit for the operation stage.

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## 2.0 Waterfront land

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### 2.1 Recommendation – Prior to determination

Department of Planning, Housing and Infrastructure requests the proponent to clarify whether infrastructure proposed on waterfront land meets the buffer requirements in the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

#### Explanation

The proposed Area 2 works appear to cover a mapped 1<sup>st</sup> order watercourse in the southern part of the works area. Clarification is required of the location of infrastructure in relation to watercourses and confirmation the project meets the Guidelines for Controlled Activities on Waterfront Land (DPE 2022).

### 2.2 Recommendation – Post determination

Department of Planning, Housing and Infrastructure requests the proponent to prepare an Erosion and Sediment Control Plan (ESCP) in accordance with industry standards, including the guideline, Managing Urban Stormwater: Soils and Construction (Landcom 2004).

#### Explanation

An ESCP provides management and mitigation measures which minimise impacts to waterfront land.

## 3.0 Groundwater Modelling

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### 3.1 Recommendation – Post approval

Department of Planning, Housing and Infrastructure request the proponent to include a section on the conceptual model in future groundwater modelling reports prepared for the project.

#### Explanation

The Groundwater modelling report (Appendix B to the Groundwater Impact Assessment (GIA)) does not include a suitable conceptual model section, however it is noted this was included in the GIA. DCCEE Water prefers modelling reports to be standalone reports, with no or minimal need to refer to additional resources to understand the work undertaken.

End Attachment A

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