

Our ref: OUT25/12467

Jack Turner
Planning Group
NSW Department of Planning, Housing and Infrastructure
Email: Jack.Turner@planning.nsw.gov.au

22/09/2025

Subject: Hunter Valley Operations North and South Open Cut Coal Continuation Project (SSD-11826621) - Amendment Report

Dear Jack Turner,

I refer to your request for advice sent on 28 August 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

NSW DCCEEW Water Group has reviewed the Amendment Report and has recommendations regarding an assessment groundwater elevations at an identified High Priority Groundwater Dependent Ecosystems (GDEs) and post approval recommendations regarding water licensing, activities on waterfront land and levee design.

Please see **Attachment A** for details.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Brownbill".

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

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Hunter Valley Operations North and South Open Cut Coal Continuation Project (SSD-11826621) - Amendment Report

1.0 Groundwater Impacts

1.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent provide a detailed analysis of the impact of altered groundwater levels on the identified High Priority Groundwater Dependent Ecosystems (GDEs) at the Carrington Billabong and mapped river red gum stands of the Hunter Regulated River.

Explanation

This analysis is required to substantiate that stream losses will adequately buffer the predicted groundwater drawdown of 0.2 to 0.5 metres in the alluvium at these locations. The primary concern is the Hunter River alluvium near the Carrington Billabong, and the mapped river red gum stands, which are classified as High Priority Groundwater Dependent Ecosystems (GDEs). The proponent states that the impact of such drawdown is expected to be buffered by leakage through the riverbed. Further hydrogeological assessment of the long-term viability of these GDEs as per the Aquifer Interference Policy minimal impact consideration is required to support this conclusion.

While the hydrological connection between the Hunter Regulated River and the alluvial aquifer is known to be strong, evidenced by transmission losses, the relative groundwater table elevations (AHD) at the GDEs compared to the Hunter Regulated River have not been assessed. This gap limits the ability to substantiate how stream losses will mitigate the mine's drawdown impact on these ecosystems.

2.0 Water supply, take and licensing

2.1 Recommendation – post approval

DPHI should request the proponent to include information on licensing arrangements for all dams onsite in the Water Management Plan.

Explanation

This is requested to understand details of all dams and their proposed licensing arrangements. This should include details of diversions and catchment areas and the relevant licences, exclusions, or exemptions. The Water Group acknowledges that when diversions are in place, watercourses may no longer be located where they are mapped which means some dams may be offline. Some diversions will have been modified or are not currently in place - if this is the case sufficient entitlement must be obtained to account for any take unless another exemption under the *Water Management (General) Regulation 2025* applies.

2.2 Recommendation – post approval

DPHI should request the proponent to hold sufficient water entitlement in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring unless an exemption under the *Water Management (General) Regulation 2025* applies.

Explanation

The proponent currently holds insufficient entitlement in Jerrys Water Source and Lower Wollombi Brook Water Source with peak take from these sources to occur during closure. The proponent must obtain sufficient entitlement to account for maximum potential take prior to take occurring.

3.0 Activities on waterfront land

3.1 Recommendation – post approval

DPHI should ensure the proponent's works within waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land.

Explanation

The Amendment Report includes new and upgraded infrastructure such as a bridge over the Hunter River, relocation of transmission lines, temporary buildings and access track works. All proposed works on waterfront land must consider the Guidelines for Controlled Activities. The guidelines can be found here: <https://water.dpie.nsw.gov.au/our-work/licensing-and-approvals/controlled-activity-approvals/guidelines>.

3.2 Recommendation – post approval

DPHI should request the proponent to develop Erosion and Sediment Control Plans in accordance with industry standards such as Managing Urban Stormwater: Soils & Construction (Landcom 2004).

Explanation

Appropriate erosion and sediment control measures need to be in place to minimise the impacts of works on waterfront land.

4.0 Flooding

4.1 Recommendation – post approval

DPHI should ensure the proponent designs and constructs the proposed levee in accordance with the International Levee Handbook to mitigate flood impacts.

Explanation

The International Levee Handbook provides guidance regarding evaluation, design, implementation, maintenance and management of levees.

End Attachment A
