

Our ref: OUT26/698

Tia Mills
Planning Group
NSW Department of Planning, Housing and Infrastructure

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27/01/2026

Subject: Gregory Place Build-to-Rent (SSD-31179510) (City of Parramatta) – Response to Submission (RTS) & Amendment Report

Dear Tia Mills,

I refer to your request for advice sent on 17 December 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 RTS and Amendment Report and has post approval recommendations that should be addressed at the detailed design stage regarding:

- quantifying the maximum annual volume of water take due to aquifer interference activities and the ability to acquire sufficient water entitlement
- acquiring a water access licence (WAL) to account for the maximum predicted water take
- assessment of impacts due to aquifer interference activities

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



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 Gregory Place Build-to-Rent (SSD-31179510) (City of Parramatta) – Response to Submission (RTS) & Amendment Report

1.0 Water supply, take and licensing

1.1 Recommendation – post approval

The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent, at the detailed design stage, to quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

Explanation

Inadequate assessment has been provided to quantify the water take due to aquifer interference associated with project for ongoing operation. The estimated maximum for water take during construction is listed as up to 57.5 ML/year in the RTS report. The proponent also confirms that when the basement designs are finalised a Site Hydrogeology Report and Dewatering Management Plan will be completed. The proponent does not confirm if this is for the ongoing operation or if it is reliant on the design of the basement. In accordance with the NSW Aquifer Interference Policy and *NSW Water Management Act 2000* groundwater take needs to be quantified and accounted for. Quantification of maximum potential inflow volumes is required. Please see the following links for guidance: [Groundwater assessment toolbox for SSD/SSI](#) and [Minimum requirements for building site groundwater investigations and reporting](#).

1.2 Recommendation – post approval

DPHI should request the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2025*.

Explanation

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the *Water Management (General) Regulation 2025* applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as

- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and
 - the records are kept for 5 years.
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Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at: <https://water.dpie.nsw.gov.au/licensing-and-trade-and-groundwater-access-licence-exemptions> | NSW Government Water.

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation – post approval

At the detailed design stage, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). Please refer to the following documents:

- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf
- https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf

Explanation

As per Recommendation 1.1 above, the RTS has not provided an adequate volumetric quantification of groundwater take. Additionally, the RTS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

End Attachment A
