

Our ref: OUT26/4256

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NSW Department of Planning, Housing and Infrastructure
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14 April 2026

Subject: Shop Top Housing – Valentine Avenue, Parramatta (SSD-90243456) – Environmental Impact Statement

Dear Annabel Turner,

I refer to your request for advice sent on 13 March 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

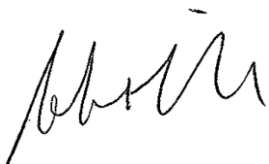
NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations to:

- Quantify water take from aquifer interference activities and assess impacts.
- Identify and assess impacts of dewatering infrastructure.
- Provide further clarification on the presence of waterfront land and drainage management.

Please see **Attachment A** for more detail.

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

Yours sincerely



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

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Shop Top Housing – Valentine Ave, Parramatta (SSD-90243456) - EIS

1.0 Water take, licensing and impact assessment

1.1 Recommendation – pre approval

The Department of Planning, Infrastructure and Housing (DPHI) requests the proponent to:

- Quantify the maximum annual volume of water take due to aquifer interference activities
- Provide details of the proposed dewatering infrastructure (water supply works) and assess the impacts of their construction and operation.
- Demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

Explanation

Insufficient information has been provided to understand the potential for groundwater interception, the associated water inflow volumes and impacts of the proposed dewatering infrastructure. The proponent must confirm the potential for groundwater inflow, and where required, quantify the maximum potential annual water take during construction and ongoing during the operation period. It is also required to confirm if a tanked or drained basement is proposed and to demonstrate the ability to obtain sufficient entitlement to account for maximum take unless an exemption under Schedule 4 of the Water Management (General) Regulation 2025 can be identified.

The proponent should also outline any water supply works (e.g. pumps) proposed to be used to dewater the basement both during construction and ongoing and provide an impact assessment of taking this water. State Significant Development projects are eligible for an exclusion to obtain a water supply work where the work is identified, and impacts assessed as a part of the SSDA under s4.41 of the EP&A Act 1979. Should this not occur, the project must obtain a water supply work approval which cannot be guaranteed without an environmental impact assessment, which poses a risk to the project.

Relevant guidelines for groundwater assessments are at the below links:

- https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/889/1/Guidelines_for_Groundwater_Documentation_for_SSD-SSI_Projects_Technical_guideline.pdf
- https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/792/1/Minimum_requirements_for_building_site_groundwater_investigations_and_reporting.pdf

2.0 Groundwater impact assessment

2.1 Recommendation – pre approval

DPHI requests the proponent to assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012) if the take of groundwater is found to be greater than 3ML per year. Relevant documents are available at:

- <https://www.water.dcceew.nsw.gov.au/sites/default/files/2025-10/NSW-Aquifer-Interference-Policy-2012.pdf>
- <https://www.water.dpie.nsw.gov.au/sites/default/files/2025-07/Aquifer-Interference-Assessment-Framework.pdf>

Explanation

As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project.

1.3 Recommendation – post approval

DPHI requests the proponent to ensure a water access licence (WAL) is obtained 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

Insufficient information has been provided to quantify groundwater take associated with the project during construction and ongoing. As requested above, this is required to inform any potential exemptions from holding a water access licence. 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 water is not taken for consumption or supply;
- 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.

Further information on these requirements and other information on licensing and approvals, exemptions, including an exemption application form and a form to report and record water taken can be found at:

<https://www.water.dcceew.nsw.gov.au/our-work/licensing-and-approvals> and
<https://www.water.dcceew.nsw.gov.au/our-work/licensing-and-approvals/water-licence-and-approval-exemptions/dewatering-exemptions>

3.0 Works on waterfront land

3.1 Recommendation – pre approval

DPHI requests the proponent to provide further clarification on the presence of waterfront land and the management of stormwater/drainage through the project site.

Explanation

Based on the NSW Hydroline layer the project is located within waterfront land (defined as 40m from top of bank). The proponent has stated works are not located within waterfront land however has not provided any further justification based on site characteristics or drainage management. It is noted in the Landscape Plan (Appendix O) there is a proposal for a cell matrix below the street paving which could be used to convey drainage through the site. Further clarification is requested on the presence of waterfront land and the management of drainage/stormwater through the site.

End Attachment A