

Our ref: OUT26/5680

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NSW Department of Planning, Housing and Infrastructure
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10 June 2026

Subject: Affordable Housing - Block 20A Edmondson Park - SSD-99909708 – Environmental Impact Statement (EIS)

Dear Angela Berryman,

I refer to your request for advice sent on 14 May 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 EIS and has recommendations regarding:

- Quantifying the maximum annual volume of water take due to aquifer interference activities and the ability to acquire sufficient water entitlement
- Identifying the water supply work and providing an impact assessment of the work.
- Water licensing requirements 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

A handwritten signature in blue ink, appearing to read "Z. Baker".

Tim Baker,
Senior Project Officer, Water Assessments, Planning and Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Detailed advice to DPHI Planning & Assessment regarding the Affordable Housing - Block 20A Edmondson Park - SSD-99909708 – Environmental Impact Statement (EIS)

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent 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

Insufficient information has been provided to confirm the potential groundwater inflow volumes. DCCEE Water notes that the groundwater table will potentially be intercepted. Maximum excavation depths for this project will be at approximately 3.5m below ground level, however the design has not yet been finalised. Groundwater was encountered in boreholes at depths of approximately 4-5m. As the excavation depth has not been finalised, it cannot be determined if groundwater will be intercepted. The proponent has not presented sufficient information and analysis on inflows during the construction and ongoing operation of the site. 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 dewatering](#)

1.2 Recommendation – pre-determination

If water take is required, DPHI should request the proponent to identify the water supply work and provide an impact assessment of the work to enable it to be exempt from an approval under Section 4.41 of the *EP&A Act*. If this information is not provided, the proponent must obtain a water supply work approval under the *Water Management Act 2000* prior to any water take occurring.

Explanation

The proponent has identified a conventional sump and pump as the method to manage groundwater inflows, however an impact assessment of this work has not been provided. For water supply works to be assessed as part of the SSD under Section 4.41 of the *EP&A Act*, the works must be clearly identified and supported by an adequate impact assessment. If this information is not provided, a separate water supply work approval under the *Water Management Act 2000* would be required.

1.3 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.

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

2.0 Groundwater impacts and dewatering requirements

2.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, 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 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. 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.