



Our ref: OUT26/8254

Your ref: SSD-84467726

Patrick Copas

Planning Group

NSW Department of Planning, Housing and Infrastructure

7 July 2026

Subject: Kogarah Golf Club Redevelopment – Concept and Stage 1 Works (SSD-84467726)– Environmental Impact Statement (EIS)

Dear Patrick Copas,

I refer to your request for advice sent on 10 June 2026 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter. The assessment has been carried forward to the Water Advisory team of the Development Coordination Authority (DCA) which was established on 1 July 2026.

DCA Water Advisory has reviewed the EIS and makes recommendations to:

- Quantify the maximum annual volume of groundwater take due to aquifer interference activities for the early works phase of the project.
- Ensure works on waterfront land are consistent with the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025).
- Ensure water licence requirements are met.

Please see **Attachment A** for details.

Should you have any further queries in relation to this submission please do not hesitate to contact the DCA Technical Advisory at technical.advisory@dphi.nsw.gov.au

Rob Brownbill,

Principal Water Advisor

Development Coordination Authority

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Attachment A - Detailed advice to DPHI Planning & Assessment regarding the Kogarah Golf Club Redevelopment – Concept & Stage 1 Works (SSD-84467726) – Environmental Impact Statement

1.0 Aquifer interference assessment and water licensing

1.1 Recommendation – pre-determination

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

- Quantify the maximum annual volume of water take due to aquifer interference activities required for the early works phase of the project.
- Demonstrate sufficient water entitlement can be obtained unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential groundwater take volumes due to aquifer interference activities required for the early works phase. It is noted excavation is required for the construction of building pads and a drainage channel realignment to a maximum depth of 4.3m below ground level (mbgl). As groundwater was observed in monitoring bores between 0.6m and 1.9 mbgl seepage into the excavation is expected. Quantification of maximum potential inflow volumes is therefore required. Relevant guidelines to consider this are available at:

- <https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/4061/1/Minimum%20requirements%20for%20building%20dewatering.pdf>
- https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/889/1/Guidelines_for_Groundwater_Documentation_for_SSD-SSI_Projects_Technical_guideline.pdf

1.2 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://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/2618/1/NSW%20Aquifer%20Interference%20Policy.pdf>
- <https://www.water.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. DCA Water Advisory 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 and assess the impacts.

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 Works on waterfront land

2.1 Recommendation – post approval

DPHI requests the proponent to ensure works on waterfront land are designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025).



Explanation

The project includes activities on waterfront land for both the concept design and early works which should be in accordance with the Guidelines for Controlled Activities on Waterfront Land (the guidelines). It is noted elements of the guidelines have been incorporated into the proposed design of the early works for the proposed watercourse crossing and realigned outlet to the Cooks River. This is supported and should be reviewed further during development of detailed designs. Although Bayside Council will finalise the main drainage corridor within the site, the landform proposed under this development application should be stable. It is recommended the guidelines be utilised to guide rehabilitation works, including planting options to assist with stability. The guidelines are available at:

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

End Attachment A