



Our ref: OUT26/8667

Your ref: SSD-91539707

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NSW Department of Planning, Housing and Infrastructure
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16 July 2026

Subject: Uniting Coffs Harbour 19A-21 Gordon Street (SSD-91539707) – Environmental Impact Statement (EIS)

Dear Chris Eldred,

I refer to your request for advice sent on 25 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 has recommendations regarding water supply, take and licensing.

Please see **Appendix 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
NSW Department of Planning, Housing and Infrastructure



Appendix A - Detailed advice to DPHI Planning & Assessment regarding Uniting Coffs Harbour 19A-21 Gordon Street (SSD-91539707) – 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 that the proponent demonstrate that a viable water supply is available for the project.

Explanation

The proponent indicates that they will use the Council potable network to meet site water demands. However, it is unclear if this has been confirmed with Council as a viable option. While an agreement does not need to be in place until the project is approved, the proponent should consult with Council to ensure there is availability in the network to provide water to the site. Confirmation this has occurred is requested.

1.2 Recommendation – post-approval

DPHI should request that the proponent 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

The proponent indicates that the estimated groundwater take during construction will be 1,000 L/day (0.365 ML/year) with no ongoing take due to a tanked basement design.

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* (WM Reg) applies. As the proposal is taking less than 3 ML/year, an exemption may be available under Clause 19 of Schedule 4 of the WM Reg. Noting this exemption is subject to mandatory monitoring and reporting requirements. If these requirements are not met, a WAL is required to be held.

More information on exemptions and how to report can be found:

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