



OUT21/15528

Andy Nixey
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

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Dear Mr Nixey

**Ivanhoe Estate Redevelopment Stage 2 (SSD-15822622) (City of Ryde) -
EIS**

I refer to your email of 14 October 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

Stage 2 of the Ivanhoe Estate redevelopment in Macquarie Park in North-Western Sydney includes the development of a 17-storey mixed use building with 168 market housing residential apartments, 24-storey building with 268 market residential apartments, and a 17-storey building comprising 216 social housing apartments.

The proponent will need to demonstrate that they are able to obtain adequate entitlement to account for the project's expected water take. Additional information should also be provided to give the Department confidence that the risk to groundwater is negligible.

Please find our detailed advice in Attachment A.

Any further referrals to DPIE Water and NRAR can be sent by email to water.assessments@dpie.nsw.gov.au. If you wish to discuss this further then please contact Liz Rogers on 0428 600 421 or by email: liz.rogers@dpie.nsw.gov.au.

Yours sincerely

Simon Francis
Senior Project Officer
Department of Planning, Industry and Environment: Water
10 December 2021

Attachment A

Detailed advice to DPIE Planning & Assessment regarding the Ivanhoe Estate Redevelopment Stage 2 (SSD – 15822622)(City of Ryde) - EIS

1.0 Water take and licensing

1.1 Explanation

NRAR expects that the combined take of the three Groundwater Interference sites, C2, C3 and C4 will be greater than 3 ML/year. This is because:

- Groundwater Interference C2 Site basement is above the measured groundwater level but some inflow is expected.
- Groundwater inflows to the Groundwater Interference C3 site will occur medium to long term. An estimate of 2ML a year is provided but higher inflows would be expected during initial excavation.
- It is estimated that medium to long term groundwater inflows between 3 to 4 ML a year with higher flows during excavation will occur for the Groundwater Interference C4 site. The proponent acknowledges a water access licence is likely to be required as there is more than 3ML a year take.

The water source is the Greater Metropolitan Region Groundwater Sources 2011 Sydney Basin Central Groundwater Source. This water source is over allocated so the proponent will need to obtain water on the market. This may be a risk to the project.

1.2 Recommendation – Prior to Determination

That the proponent:

- Provide a consolidated site water balance including estimated take during construction and operational phases including groundwater inflows and discharge.
- Demonstrate adequate groundwater entitlements can be obtained for the projects expected water take during construction and for all ongoing operational take unless an exemption under the *Water Management (General) Regulation 2018* applies.

1.3 Recommendation – Post approval

The proponent must ensure sufficient water entitlement is held in a Water Access Licence (WAL) to account for the maximum predicted water take for each water source prior to take occurring unless an exemption under the *Water Management (General) Regulation 2018* applies.

2.0 Groundwater impacts

2.1 Explanation

The proposed development is unlikely to pose a high risk to groundwater, however the EIS hasn't included sufficient information to demonstrate this is the case. Additional information should be provided by the proponent to give the Department confidence that the risk to groundwater is negligible.

Proposed excavation and construction activities have the potential to intercept groundwater and constitute aquifer interference activities under the *Water Management Act 2000*. No assessment of impacts to groundwater was provided.

Multiple SEARs relating to potential groundwater impacts were not addressed with sufficient detail to give DPIE-Water confidence that the project will have no more than minimal harm to groundwater sources.

2.2 Recommendation – Prior to Determination

That the proponent:

- As required by Condition 17 of the SEARs:
 - a. Undertake an assessment of potential impacts to the relevant groundwater source(s), groundwater dependent ecosystems, other water users, and basic land-rights holder bores,
 - b. Provide maps of the listed relevant features, and
 - c. Provide additional data related to baseline groundwater conditions.

2.3 Recommendation – Post Approval

That the proponent:

- incorporate tanked-basement designs where basement inverts are below the high-water table.
- prepare a Dewatering Management Plan consistent with the requirements set out in the NSW Government guideline 'Minimum requirements for building site groundwater investigations and reporting' (DPIE 2021), in consultation with DPIE Water.
- prepare and implement a groundwater management and monitoring plan.

End Attachment A