

## **Department of Planning and Environment**

OUT22/1472

David Glasgow Planning and Assessment Group NSW Department of Planning and Environment

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Dear Mr Glasgow

# Eden Street, Arncliffe Mixed Use Redevelopment (Priority Project) - SSD-11429726 - RTS

I refer to your email of 11 February 2022 to the Department of Planning and Environment (DPE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The project consists of demolition of all existing buildings on site and the construction of a 4 tower mixed-use precinct with residential, retail and community space.

The proponent will need to provide further details for groundwater take (including estimates of groundwater inflows both during construction and operation) and determine if any water licences are required. The proponent will also need to assess the impact of development as per the requirements of the NSW Aquifer Interference Policy. Please see Attachment A for the associated recommendations and explanations.

Any further referrals to DPE Water and NRAR can be sent by email to water.assessments@dpie.nsw.gov.au or to the following coordinating officer within DPE Water:

Simon Francis – Senior Project Officer E: simon.francis@dpie.nsw.gov.au

M: 0428 926 117

Yours sincerely

E Rogos

Liz Rogers

Manager, Assessments

**Department of Planning and Environment: Water** 

28 February 2022

## Attachment A

Detailed advice to DPE Planning & Assessment regarding the Eden Street, Arncliffe Mixed Use Redevelopment (Priority Project) - SSD-11429726 – RTS

# 1. Groundwater Take and Licensing

## Recommendations - Prior to Determination

- **1.1** The proponent should:
  - **a.** Provide a consolidated site water balance which includes estimated volumes of groundwater inflows (both during construction and operation).
  - **b.** Demonstrate the ability to source water entitlement for the predicted groundwater take (if an exemption is not applicable).

## **Explanation**

Insufficient information has been provided to confirm the potential groundwater inflow volumes during construction or operation. While the exemption for water take for less than 3 ML a year (Schedule 4 Clause 7 of the Water Management (General) Regulation 2018) has been mentioned by the proponent, no estimations of water take have been provided to confirm the applicability of the exemption. The Department notes that should entitlement be required to account for water take that exceeds 3ML, this would need to be sourced via trading with existing water entitlements held in the Sydney Basin Central Groundwater Source or by a controlled allocation. Please note more information at at https://www.industry.nsw.gov.au/water/allocations-availability/controlled.

## 2. Groundwater Impact Assessment and Management

## Recommendation - Prior to Determination

2.1 The proponent should assess the impact of development as per the requirements of the NSW Aquifer Interference Policy.

#### Explanation

An assessment against the 'minimal impact considerations' of the AIP has not been provided either in the EIS or in the RTS. Extraction volume of groundwater, impact of extraction on the groundwater source, users and groundwater dependent ecosystem, and subsidence risk have not been identified by the proponent.

#### TO NOTE:

#### Drained Basement Design

DPE – Water prefers fully-tanked basement designs to reduce future burden of operational requirements as well limiting potential groundwater impacts to the duration of construction (please see the guideline - *Minimum requirements for building site groundwater investigations and reporting* at: <a href="https://www.industry.nsw.gov.au/">https://www.industry.nsw.gov.au/</a> data/assets/pdf file/0004/343291/minimum-requirements.pdf. However, the proposed drained basement design can be considered due to the lower impact factors such as: site specific ground conditions; potentially low inflows; lesser risk of impacts to neighbouring users and/or GDEs; and low potential for ground surface settlement.

## Recommendation - Post Approval

2.2 The proponent should submit a dewatering management plan.