

Our ref: OUT23/5555

Judith Elijah

Planning and Assessment Group
NSW Department of Planning and Environment

Email: Judith.elijah@dpie.nsw.gov.au

14 April 2023

Subject: **Narwee Parklands Seniors Housing (SSD-45024776) – Environmental Impact Statement (EIS)**

Dear Judith Elijah,

I refer to your request for advice sent on 15 March 2023 to the Department of Planning and Environment (DPE) Water about the above matter.

The proposed development includes the demolition of existing structures and construction of a 3-storey residential care facility and one-level basement for carpark.

DPE Water has reviewed the Environmental Impact Statement (EIS) and has recommendations regarding groundwater take and entitlement. Please see Attachment A for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments water.assessments@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in blue ink that reads "Liz Rogers".

Liz Rogers
Manager, Assessments, Knowledge Division
Department of Planning and Environment: Water

Attachment A

Detailed advice to DPE Planning & Assessment regarding the Narwee Parklands Seniors Housing EIS (SSD-45024776)

1.0 Water take and entitlement

1.1 Recommendation – Prior to Determination

That the proponent:

- 1 ensure that the depth of investigation boreholes is no less than the proposed excavation depth of 6.5 meters to confirm the depth to groundwater.
- 2 If groundwater is predicted within cut/excavation depths:
 - a. Estimate the volume of take using an appropriate analytical model. If take is less than 3 ML, an exemption for a water access license may apply (in accordance with Schedule 4 of the *NSW Water Management (General) Regulation 2018*)
 - b. Undertake a review of take estimates during construction and ongoing and consideration of impacts against the NSW Aquifer Interference Policy (2012). The proponent should consider the *Minimum requirements for building site groundwater investigations and reporting* and broader implications that will affect the design and ultimately groundwater takes to be licenced.

1.1 Recommendation – Post approval

Should groundwater be intercepted a Water Access Licence (WAL) under the Water Management Act 2000 must be obtained where the take is greater than or equal to 3ML of water per year for any aquifer interference activities listed in *Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018*.

Explanation

1 Groundwater information

According to the '*Minimum requirements for building site groundwater investigations and reporting*' to ensure comprehensive documentation of subsurface conditions at a project site, drilling investigations should be conducted at depths greater than the proposed lowermost basement level.

The investigation boreholes (BH1 to BH6, BH101 & BH102) drilled on-site have depths ranging between 5 and 5.5 mbgl. For projects involving one-level basement construction with assumed substructure depth of at least 3 mbgl, the department generally suggests constructing at least one investigation hole drilled to 10 mbgl assuming uniform ground conditions.

2 Groundwater take and impact

If groundwater is predicted from the updated intrusive investigations:

- a. The proponent must derive estimates of dewatering take using analytical modelling techniques and provide clear evidence of reasonable assumptions made in calculations of take.

Ongoing monitoring of groundwater levels below and around the proposed development site is required during and after construction to substantiate the estimated take volume. The proponent must install at least three monitoring bores screened across the lowermost basement level as per the '*Minimum requirements for*

building site groundwater investigations and reporting' document, at or around the subject property.

If the dewatering take exceeds 3 ML/year, the proponent must also obtain a water access license (WAL) to lawfully authorize the dewatering.

To qualify for the less than 3ML/year of take exemption, as per Schedule 4 of the Water Management (General) Regulation 2018, the proponent shall:

- Record the water take within 24 hours in the approved form and manner
- Provide the water take records to the Minister by no later than 28 July for the year ending 1 July during which the water was taken
- Keep the water take records for a period of five years

For more information visit <https://water.dpie.nsw.gov.au/licensing-and-trade/licensing/groundwater-wal-exemptions>

- b. The development is classified as an aquifer interference activity. Therefore, an assessment against 'minimal impact considerations' outlined in Table 1 of *NSW Aquifer Interference Policy* is required. This includes assessing the effects of pumping of groundwater by a dewatering activity in terms of water level drawdown, water quality, surrounding environment and authorization volume.

End Attachment A