

**Department of Climate Change, Energy, the Environment
and Water**



Our ref: OUT25/3729

Tuong Vi Doan
Planning and Assessment Group
NSW Department of Planning, Housing and Infrastructure
Email: Tuongvi.Doan@planning.nsw.gov.au

7 April 2025

Subject: Uniting War Memorial Hospital Waverley (SSD-61389706) – Environmental Impact Statement

Dear Tuong Vi Doan,

I refer to your request for advice sent on 10 March 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations in regard to water take, licensing and dewatering management. Please see **Attachment A** for more detail.

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

Yours sincerely,

Claire McQueeney
Senior Project Officer, Water Assessments, Knowledge Division
Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice regarding the Uniting War Memorial Hospital Waverley (SSD-61389706) – EIS

1.0 Water take and licensing

1.1 Recommendation – Prior to determination

NSW Department of Planning, Housing and Infrastructure requests the proponent to demonstrate the ability to acquire sufficient water entitlement to account for water take, unless an exemption applies under the *Water Management (General) Regulation 2018*.

Explanation

The proponent has predicted groundwater take during the construction period is going to exceed 3ML/yr. This will need to be accounted for by obtaining a Water Access Licence with sufficient entitlement in the relevant water source. This is yet to be demonstrated by the proponent.

1.2 Recommendation – Post determination

NSW Department of Planning, Housing and Infrastructure requests the proponent to ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2018*.

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 Clause 7 of Schedule 4 of the *Water Management (General) Regulation 2018* applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:

- the water is not taken for consumption or supply;
- 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://water.dpie.nsw.gov.au/licensing-and-trade> and <https://water.dpie.nsw.gov.au/our-work/licensing-and-trade/water-access-licences-and-approvals/exemptions-for-water-licences-and-works-and-or-use-approvals>

2.0 Dewatering management

2.1 Recommendation – post determination

NSW Department of Planning, Housing and Infrastructure requests the proponent to prepare a Dewatering Management Plan that address the requirements of the Guidelines for Groundwater Documentation for SSD/SSI Projects (2022) and the Minimum Requirements for Building Site Groundwater Investigations and Reporting (2022). These documents are available at:

https://publications.water.nsw.gov.au/watergroupjspui/bitstream/100/792/1/Minimum_requirements_for_building_site_groundwater_investigations_and_reporting.pdf

https://water.nsw.gov.au/___data/assets/pdf_file/0020/507611/Guidelines-for-Groundwater-Documentation-for-SSD-SSI-Projects.pdf

Explanation

NSW DCCEE Water Group notes that a Dewatering Management Plan has been submitted with the EIS, however the document does not include references to the guidelines listed above. Key aspects relevant to this project include the following:

- How actual water take will be measured and reported.
- A Trigger Action and Response Procedure which:
 - establishes trigger levels based on predicted water take/groundwater levels, and
 - response actions if triggers are exceeded.
- Construction and operation groundwater level monitoring.

End of Attachment A