

Our ref: OUT25/10984

Stephen Dobbs  
Planning Group  
NSW Department of Planning, Housing and Infrastructure

Email: [stephen.dobbs@dpie.nsw.gov.au](mailto:stephen.dobbs@dpie.nsw.gov.au)

22/08/2025

---

Subject: Seniors Housing IRT Woonona Redevelopment, 4-6 Popes Road, Woonona (SSD-73910208) – Environmental Impact Statement (EIS)

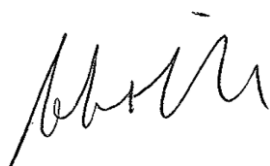
Dear Stephen Dobbs,

I refer to your request for advice sent on 24 July 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 EIS and has recommendations regarding water supply, take and licensing, and groundwater impacts. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au).

Yours sincerely



Rob Brownbill,  
Manager, Water Assessments, Knowledge Division  
NSW Department of Climate Change, Energy, the Environment and Water

## Attachment A

---

# Detailed advice to DPHI Planning & Assessment regarding the Seniors Housing IRT Woonona Redevelopment, 4-6 Popes Road, Woonona (SSD-73910208) – 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 clarification from the proponent as to whether the proposed basements will be drained or tanked.

#### Explanation

The hydrogeological assessment states that there is uncertainty as to whether the proposed basement will be free draining or tanked and therefore it is not possible to determine the water licensing requirements with certainty.

### 1.2 Recommendation – post approval

DPHI should request 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* (WM Reg).

#### 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 the *Water Management (General) Regulation 2018* applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 2 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3ML per water year (cl 7, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as

- 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 [Groundwater access licence exemptions | NSW Government Water](#).

---

## 2.0 Groundwater impacts and dewatering requirements

---

### 2.1 Recommendation - pre-determination

The Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy (NSW AIP) (2012).

#### Explanation

The proponent has not provided an assessment of impacts to groundwater due to construction or operation of the project. The NSW AIP sets out the assessment requirements for aquifer interference activities. To enable water supply works to be excluded from the requirement for an approval under the *Water Management Act 2000*, these works must be assessed within the SSD documentation.

The proponent must assess the impacts due to aquifer interference activities in accordance with the NSW AIP and framework (2012). Please refer to the following documents:

- [https://water.dpie.nsw.gov.au/\\_data/assets/pdf\\_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf](https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf)
- [https://water.dpie.nsw.gov.au/\\_data/assets/pdf\\_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf](https://water.dpie.nsw.gov.au/_data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf)

### 2.2 Recommendation - post approval

DPHI requests the proponent to prepare a Dewatering Management Plan in consultation with NSW DCCEE Water Group.

#### Explanation

NSW DCCEE Water Group notes that groundwater inflow volumes are likely to exceed 3 ML per year. Therefore, a Dewatering Management Plan (DMP) must be prepared and provided to NSW DCCEE Water Group. The DMP should consider the Guidelines for Groundwater Documentation for SSD/SSI Projects (2022) and the Minimum Requirements for Building Site Groundwater Investigations and Reporting (2022) to ensure the documentation required is fit for purpose. 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://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](https://water.nsw.gov.au/_data/assets/pdf_file/0020/507611/Guidelines-for-Groundwater-Documentation-for-SSD-SSI-Projects.pdf)

## 3.0 Activities on waterfront land

---

### 3.1 Recommendation - pre-determination

The proposed Vegetation Management Plan for Collins Creek must consider the Guidelines for Controlled Activities – Vegetation Management Plans. The guidelines can be found here:

---

<https://water.dpie.nsw.gov.au/our-work/licensing-and-approvals/controlled-activity-approvals#guidelines-for-controlled-activity-approvals>

End Attachment A

