

Our ref: OUT25/10464

Adela Murimba
Planning Group
NSW Department of Planning, Housing and Infrastructure

Email: adela.murimba@dpie.nsw.gov.au

9/09/2025

Subject: Residential flat building with in-fill affordable housing - 19 - 25 Balfour Street, Lindfield - SSD-82709458 – Environmental Impact Statement (EIS)

Dear Adela Murimba,

I refer to your request for advice sent on 13 August 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

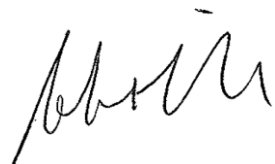
NSW DCCEEW Water Group has reviewed the EIS and has recommendations regarding:

- quantifying the maximum annual volume of water take due to aquifer interference activities and the ability to acquire sufficient water entitlement
- demonstrate there is a secure water supply to meet site water demands during construction and ongoing
- acquiring a water access licence (WAL) to account for the maximum predicted water take
- assessment of impacts due to aquifer interference activities

Please see **Attachment A** for details.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.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 Residential flat building with in-fill affordable housing - 19 - 25 Balfour Street, Lindfield - SSD-82709458 – 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 seek from the proponent the maximum annual volume of water take due to aquifer interference activities and the ability to acquire sufficient water entitlement unless an exemption applies.

Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes. NSW DCCEEW Water Group notes that the groundwater table will be intercepted. Maximum excavation depths for this project are approximately 15mbgl. The proponent has not presented information and analysis on inflows during the construction and ongoing operation of the site. Quantification of maximum potential inflow volumes is required.

1.2 Recommendation – pre-determination

DPHI should request the proponent to demonstrate there is a secure potable water supply to meet site water demands during construction and ongoing.

Explanation

The proponent has not detailed the source and availability of potable water for the site. Confirmation should be provided of consultation including acknowledgement of estimated demands with the relevant water suppliers has occurred.

1.2 Recommendation – post approval

DPHI should ensure the proponent acquires a water access licence (WAL) 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 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

If the take of groundwater is found to be greater than 3 ML per year, DPHI should seek from the proponent an assessment of impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:

- 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

Explanation

As per Recommendation 1.1 above, the proponent has not provided a volumetric quantification of groundwater take. Additionally, the proponent has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

End Attachment A
