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17/10/2025

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Subject: Mixed Use Development with In-Fill Affordable Housing – Moseley Street and Donald Street, Carlingford (SSD-83870463) – Environmental Impact Statement

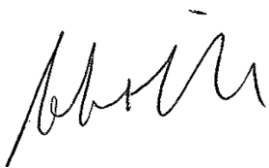
Dear Akshay Bishnoi,

I refer to your request for advice sent on 3 October 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 quantifying groundwater take, water licensing and assessing impacts for the project. Further detail is provided in Attachment A.

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

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# Detailed advice to DPHI Planning & Assessment regarding the Mixed Use Development - Moseley St and Donald St, Carlingford (SSD-83870463) – EIS

## 1.0 Water take and licensing

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### 1.1 Recommendation – pre determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to quantify the maximum annual volume of water take due to aquifer interference activities and demonstrate the ability to acquire sufficient water entitlement unless an exemption applies.

#### Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes during construction and operation and how this will be managed. DCCEEW Water notes the Geotechnical Investigation (Appendix Q) references drilling to a depth of no greater than 5 metres. However, as the bulk excavation is proposed to a depth of 10.5m, the potential for groundwater interception below 5m and the associated water take has not been assessed. Quantification of the maximum potential annual groundwater take is required for the construction and operational phases of the project and consideration of relevant licensing requirements.

Please see the following links for guidance: [Groundwater assessment toolbox for SSD/SSI](#) and [Minimum requirements for building site groundwater investigations and reporting](#).

### 1.2 Recommendation – post determination

That DPHI requests the proponent to obtain 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 2025*.

#### 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 2025* applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 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 19, 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:

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<https://water.dpie.nsw.gov.au/licensing-and-trade> and [Groundwater access licence exemptions | NSW Government Water](#).

## 2.0 Groundwater impacts and dewatering requirements

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### 2.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, DPHI should request the proponent to assess impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy 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)

#### Explanation

As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS 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

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