

Our ref: OUT25/14282

Michelle Niles
Planning Group
NSW Department of Planning, Housing and Infrastructure

Email: michelle.niles@dpie.nsw.gov.au

12/11/2025

Subject: Mixed use development with in-fill affordable housing 164-194 William Street,
Woolloomooloo (SSD-80211463) – Environmental Impact Statement

Dear Michelle Niles,

I refer to your request for advice sent on 29 October 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

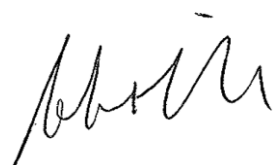
NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes recommendations to:

- Clarify the basement design and water supply works used for the groundwater seepage analysis for operation of the project.
- Ensure sufficient entitlement in a water access licence is held unless an exemption applies.

Please see Attachment A for further detail.

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.

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 Mixed use development with in-fill affordable housing 164-194 William St, Woolloomooloo (SSD-80211463) – EIS

1.0 Groundwater assessment and water licensing

1.1 Recommendation – pre-determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Confirm the basement drainage design and pump out system used to predict the post construction groundwater inflows.
- Commit to revise the groundwater seepage analysis and impact assessment if there is a change to the drainage design.

Explanation

The Groundwater Impact Assessment (Appendix Z) has provided modelled groundwater inflows for the operation phase however the drainage works and pump out system is not detailed. Clarification of the works, at least in concept form, is required to understand what the modelled inflows and impacts have been based on. This is also required to enable an exclusion from a water supply works approval under section 4.41 of the *Environmental Planning and Assessment Act 1979*.

Should there be a change in the design of the basement drainage system prior to construction, the groundwater seepage analysis will need to be updated to confirm the inflow and impact predictions and the need to revisit monitoring and licensing requirements.

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

The Groundwater impact assessment (Appendix Z) predicted groundwater inflows during construction of 1.8ML/yr for a base case and 6.7ML/yr in the highest permeability sensitivity case. Post construction inflows were predicted at 0.4ML/yr for the base case and 3ML/yr for the highest permeability sensitivity case. 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: <https://water.dpie.nsw.gov.au/licensing-and-trade> and [Groundwater access licence exemptions | NSW Government Water](#).

End Attachment A
