

5 May 2022

17156

Michael Cassel
Secretary
Department of Planning and Environment
12 Darcy Street,
Parramatta NSW 2150

Attn: Rodger Roppolo

RESPONSE TO SUBMISSIONS

Ivanhoe Estate (Midtown), Macquarie Park – Stage 2 (SSD 15822622)

A State Significant Development Application (SSDA-15822622) and accompanying Environmental Impact Statement (EIS) was lodged with the Department of Planning and Environment (DPE) on 26 August 2021 and publicly exhibited between Tuesday 19 October 2021 and Monday 15 November 2021. The SSDA seeks consent for the detailed design and construction of Stage 2 of the Ivanhoe Estate redevelopment, comprising the construction of Block C2 (community centre, pool, gym and open space), Block C3 (mixed use residential and retail), and Block C4 (market and social housing apartments).

In response to the submissions received during the exhibition of the EIS, a Response to Submissions and Amendment Report was prepared including amended plans and technical studies, and lodged with DPE in March 2022. However, because of ongoing testing and consultation, a response to the submission received from DPIE-Water/NRAR was not included. Accordingly, this additional Response to Submissions statement is prepared in response to that outstanding submissions from DPIE-Water/NRAR, and has been prepared with reference to post-lodgement consultation and meetings that have been undertaken with DPIE-Water and NRAR.

The following table provides a summary of the response to those matters raised by DPIE-Water/NRAR. This letter is also accompanied by a Groundwater Management Statement and Dewatering Management Plan prepared by Douglas Partners.

Issue Raised	Applicant Response
NRAR expects that the combined take of the three Groundwater Interference sites, C2, C3 and C4 will be greater than 3 ML/year. This is because: - Groundwater Interference C2 Site basement is above the measured groundwater level but some inflow is expected. - Groundwater inflows to the Groundwater Interference C3 site will occur medium to long term. An estimate of 2ML a year is provided but higher inflows would be expected during initial excavation. - It is estimated that medium to long term groundwater inflows between 3 to 4 ML a year with higher flows during excavation will occur for the Groundwater Interference C4 site. The proponent acknowledges a water access licence is likely to be required as there is more than 3ML a year take. The water source is the Greater Metropolitan Region Groundwater Sources 2011 Sydney Basin Central Groundwater Source. This water source is over allocated so the proponent will need to obtain water on the market. This may be a risk to the project.	The Dewatering Management Plan prepared by Douglas Partners accompanying this response confirms the inflow rates for the short term (during construction) and the long term (basements left as drained) stages of the project as follows: - Excavation phase: 2.7 ML/year for Block C3 4.5 ML/year for Block C4 - Operational phase: 1.5 ML/year for Block C3 4.5 ML/year for Block C4 Addressing the building basements as one project equates to 7 ML/year for the consolidated basements of the Stage 2 area, in the long-term. Douglas Partner's analysis also indicates that while some drawdown may occur around the C2 excavation, given the nominal depth into the existing groundwater at that location, there will be

Recommendation prior to determination

That the proponent:

- Provide a consolidated site water balance including estimated take during construction and operational phases including groundwater inflows and discharge.
- Demonstrate adequate groundwater entitlements can be obtained for the projects expected water take during construction and for all ongoing operational take unless an exemption under the Water Management (General) Regulation 2018 applies.

Recommendation post approval

The proponent must ensure sufficient water entitlement is held in a Water Access Licence (WAL) to account for the maximum predicted water take for each water source prior to take occurring unless an exemption under the Water Management (General) Regulation 2018 applies.

negligible inflows to the C2 basement as compared to the C3 and C4 basements.

It is evident, therefore, that the project will require water entitlements held via a Water Access Licence (WAL) to account for the likely water take.

In this respect, we would recommend that a condition of consent be imposed on the DA requiring that the appropriate entitlements are obtained and evidence provided to the Certifier prior to the commencement of any excavation works.

The proposed development is unlikely to pose a high risk to groundwater, however the EIS hasn't included sufficient information to demonstrate this is the case. Additional information should be provided by the proponent to give the Department confidence that the risk to groundwater is negligible. Proposed excavation and construction activities have the potential to intercept groundwater and constitute aquifer interference activities under the Water Management Act 2000. No assessment of impacts to groundwater was provided.

Multiple SEARs relating to potential groundwater impacts were not addressed with sufficient detail to give DPIE-Water confidence that the project will have no more than minimal harm to groundwater sources.

Recommendation prior to determination

That the proponent:

- As required by Condition 17 of the SEARs: a. Undertake an assessment of potential impacts to the relevant groundwater source(s), groundwater dependent ecosystems, other water users, and basic landrights holder bores, b. Provide maps of the listed relevant features, and c. Provide additional data related to baseline groundwater conditions

Recommendation post approval

That the proponent:

- incorporate tanked-basement designs where basement inverts are below the high-water table.
- prepare a Dewatering Management Plan consistent with the requirements set out in the NSW Government guideline 'Minimum requirements for building site groundwater investigations and reporting' (DPIE 2021), in consultation with DPIE Water.
- prepare and implement a groundwater management and monitoring plan.

This additional response is accompanied by a Groundwater Management Statement and Dewatering Management Plan prepared by Douglas Partners, which summarises previous and updated assessments conducted on this site and confirms the impacts to groundwater in accordance with the DPIE-Water/NRARS submission.

Accordingly, in line with the original EIS, no adverse or residual environmental, social or economic impacts have been identified as a result of the proposed development. The project required water entitlements can be managed through an appropriately worded condition of consent.

Yours sincerely,



Anna Nowland
Principal Planner