

Memorandum

To:	Novus Investco Pty Ltd c/o Solis Projects Pty Ltd	Date:	3 October 2025
Attention:	Adrian Dunnett Charles Maxwell	Project No.:	233988.01
Email:	adrian@solis-projects.com.au cmaxwell@novusaus.com	Reference:	R.002.Rev0R.002.Rev0
Subject:	Response to DCCEEW RFI Novus on Victoria (SSD-63324208) 410-416 Victoria Ave, Chatswood		

It is understood that a Request for Further Information (RFI) has been issued to Novus Investco Pty Ltd by the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW), as outlined in the attached correspondence dated 12 September 2025.

We understand that DCCEEW has requested quantification of the proposed groundwater take associated with the development.

As outlined in our Geotechnical Desktop Assessment Report, the site is currently fully occupied by existing commercial properties, with buildings extending from boundary to boundary. This restricts access for undertaking intrusive geotechnical and groundwater investigations, including drilling to install groundwater monitoring wells (piezometers) to obtain in-situ groundwater level and quality data.

It is acknowledged that groundwater investigation and monitoring data are required to satisfy the Minimum requirements for building site groundwater investigation and reporting issued by the Department of Planning and Environment. It is recommended that this is to be addressed by way of consent condition undertaking the following scope of works prior to the issue of a Construction Certificate for bulk excavation works:

- Installation of a minimum of three groundwater monitoring wells to approximately 18 m depth below existing surface levels (drilled to ~RL 78, which is about 6 m below the proposed basement level).
- Permeability testing within the installed wells.
- Obtain groundwater samples to assess groundwater quality data.
- Groundwater monitoring over a minimum 3-month period to capture groundwater level fluctuations.
- Preparation of a Groundwater Impact Assessment to quantify the estimated groundwater inflows and proposed groundwater take associated with the development. This assessment will address both temporary groundwater take during construction and the long-term annual groundwater take.

At present, due to site access restrictions, a preliminary desktop-based estimation has been provided. This indicates that groundwater take is minimal and is anticipated to be less than

3 ML/year. This estimation will be reassessed once the proposed investigation works can be undertaken, following demolition of the existing structures to allow drilling rig access.

We trust this meet your present requirements. If you have any questions, please feel free to contact the undersigned

Douglas Partners Pty Ltd

A handwritten signature in black ink, appearing to read 'Adam Teoh', written over a horizontal line.

Adam Teoh
Associate

Attachments:

About This Report

RFI from DCCEEW

Introduction

These notes have been provided to amplify DP's report in regard to classification methods, field procedures and the comments section. Not all are necessarily relevant to all reports.

DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely.

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Borehole and Test Pit Logs

The borehole and test pit logs presented in this report are an engineering and/or geological interpretation of the subsurface conditions, and their reliability will depend to some extent on frequency of sampling and the method of drilling or excavation. Ideally, continuous undisturbed sampling or core drilling will provide the most reliable assessment, but this is not always practicable or possible to justify on economic grounds. In any case the boreholes and test pits represent only a very small sample of the total subsurface profile.

Interpretation of the information and its application to design and construction should therefore take into account the spacing of boreholes or pits, the frequency of sampling, and the possibility of other than 'straight line' variations between the test locations.

Groundwater

Where groundwater levels are measured in boreholes there are several potential problems, namely:

- In low permeability soils groundwater may enter the hole very slowly or perhaps not at all during the time the hole is left open;
- A localised, perched water table may lead to an erroneous indication of the true water table;
- Water table levels will vary from time to time with seasons or recent weather changes. They may not be the same at

the time of construction as are indicated in the report; and

- The use of water or mud as a drilling fluid will mask any groundwater inflow. Water has to be blown out of the hole and drilling mud must first be washed out of the hole if water measurements are to be made.

More reliable measurements can be made by installing standpipes which are read at intervals over several days, or perhaps weeks for low permeability soils. Piezometers, sealed in a particular stratum, may be advisable in low permeability soils or where there may be interference from a perched water table.

Reports

The report has been prepared by qualified personnel, is based on the information obtained from field and laboratory testing, and has been undertaken to current engineering standards of interpretation and analysis. Where the report has been prepared for a specific design proposal, the information and interpretation may not be relevant if the design proposal is changed. If this happens, DP will be pleased to review the report and the sufficiency of the investigation work.

Every care is taken with the report as it relates to interpretation of subsurface conditions, discussion of geotechnical and environmental aspects, and recommendations or suggestions for design and construction. However, DP cannot always anticipate or assume responsibility for:

- Unexpected variations in ground conditions. The potential for this will depend partly on borehole or pit spacing and sampling frequency;
- Changes in policy or interpretations of policy by statutory authorities; or
- The actions of contractors responding to commercial pressures.

If these occur, DP will be pleased to assist with investigations or advice to resolve the matter.

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About this Report

Site Anomalies

In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later stage, well after the event.

Information for Contractual Purposes

Where information obtained from this report is provided for tendering purposes, it is recommended that all information, including the written report and discussion, be made available. In circumstances where the discussion or comments section is not relevant to the contractual situation, it may be appropriate to prepare a specially edited document. DP would be pleased to assist in this regard and/or to make additional report copies available for contract purposes at a nominal charge.

Site Inspection

The company will always be pleased to provide engineering inspection services for geotechnical and environmental aspects of work to which this report is related. This could range from a site visit to confirm that conditions exposed are as expected, to full time engineering presence on site.

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Our ref: OUT25/12019

Brendon Roberts
Planning Group
NSW Department of Planning, Housing and Infrastructure
Email: brendon.roberts@planning.nsw.gov.au

12/09/2025

Subject: Novus on Victoria, Chatswood – Build to Rent (SSD-63324208) – Response to Submissions and Amendment Report

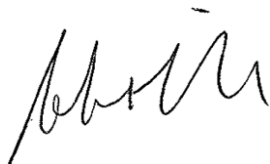
Dear Brendon Roberts,

I refer to your request for advice sent on 2 September 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 Response to Submissions and notes no additional information has been provided to address our recommendation of quantifying groundwater take. The recommendation is reiterated and is to be reviewed in the context of the amended proposal which includes a reduction in basement levels. Further detail is included 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.

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 Novus on Victoria, Chatswood – Build to Rent (SSD-63324208) – RTS & Amendment Report

1.0 Water take and licensing

1.1 Recommendation – prior to 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

DCCEEW Water is reiterating this recommendation which was provided on review of the EIS for this project. The Response to Submissions has referred to information provided at the EIS stage, however this is inadequate as it is not supported by onsite baseline groundwater conditions nor a quantitative assessment of groundwater take. Quantification of maximum potential annual groundwater take is required for construction and operation of the project. This also needs to consider the revised basement design included in the amended project.

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 should request 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:

<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 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/0007/171097/Aquifer-Interference-Assessment-Framework.pdf

Explanation

Although groundwater take is not anticipated to be significant, -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