

Our ref: OUT22/18538

Megan Fu
Planning and Assessment Group
NSW Department of Planning and Environment
Email: megan.fu@planning.nsw.gov.au

21 October 2022

Subject: **Greenwich Hospital Redevelopment (SSD-13619238) – Environmental Impact Statement (EIS)**

Dear Ms Fu

I refer to your request for advice sent on 26 September 2022 to the Department of Planning and Environment (DPE) Water about the above matter.

This proposal seeks approval for the detailed design and construction of the redevelopment of Greenwich Hospital into an integrated health campus.

DPE Water has reviewed the Environmental Impact Statement and provides the following recommendations. The proponent should:

- Provide an assessment of the activities against the ‘minimal impact considerations’ of the NSW Aquifer Interference Policy (AIP).
- Provide estimates of groundwater take during construction and operation of the proposed development.
- Ensure sufficient water entitlement is held in a Water Access Licence/s to account for the maximum predicted take for each water source before any take commences (unless an exemption applies).

Please see Attachment A for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DPE Water Assessments water.assessments@dpie.nsw.gov.au or to the following coordinating officer within DPE Water:

Simon Francis – Senior Project Officer
E: simon.francis@dpie.nsw.gov.au
M: 0428 926 117

Yours sincerely



Tim Baker
Senior Project Officer, Assessments, Knowledge Division
Department of Planning and Environment: Water

Attachment A

Detailed advice to DPE Planning & Assessment regarding the Greenwich Hospital Redevelopment (SSD-13619238) – EIS

1.0 Groundwater Impact Assessment, Take and Licencing

1.1 Recommendations – Prior to Determination

The proponent should:

- Provide an assessment of the activities against the ‘minimal impact considerations’ of the NSW Aquifer Interference Policy (AIP).
- Provide estimates of groundwater take during construction and operation of the proposed development.

1.2 Recommendation – Post Approval

- Ensure sufficient water entitlement is held in a Water Access Licence/s to account for the maximum predicted take before any take commences (unless an exemption applies).

Explanation

AIP

Interception of the water table constitutes an aquifer interference activity and requires assessment against the ‘minimal impact considerations’ of the AIP. It is the responsibility of the proponent to present on the potential impacts of the project submitted for approval under the *Environmental Planning Assessment Act 1979*. (https://www.industry.nsw.gov.au/data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf).

Groundwater Take and Licencing

The proponent notes there is the potential for groundwater inflows during basement construction. Appendix W - Additional Geotechnical Investigation notes there is the possibility for groundwater seepage to be encountered during basement excavation as groundwater levels are expected to be between 3.7m and 9.94m. However, there is no indication of volume or licencing requirements mentioned in the provided EIS documentation. The proponent should quantify the maximum annual volume of water take required for the project (for both construction and operation of the proposed development).

The proponent should also account for this take with sufficient entitlement, under a Water Access Licence (WAL), unless an exemption applies. An exemption is dependent on the volumes in Schedule 4 Clause 7 of the Water Management (General) Regulation 2018. This is for the take less than or equal to 3ML per year for aquifer interference activities. More information can be found <https://water.dpie.nsw.gov.au/licensing-and-trade/licensing/groundwater-wal-exemptions>

The proponent must ensure the relevant WAL(s) are held to account for the maximum predicted take for each water source, prior to take occurring.

2.0 Controlled Activities on Waterfront Land

2.1 Recommendation – Post Approval

Works within waterfront land need to be in accordance with the Guidelines for Controlled Activities on Waterfront Land.

Explanation

Works on waterfront land including outlets and vegetation management plans should be in accordance with the Guidelines for Controlled Activities on waterfront land. There is a 2nd order watercourse (Gore Creek) adjacent to the south western corner of the lot. The proposed works are further back from the watercourse than what currently exists allowing for an increased riparian area. A VMP has been provided showing revegetation along the edge of works to improve riparian vegetation. The guidelines are available at: <https://water.dpie.nsw.gov.au/licensing-and-trade/approvals/controlled-activity-approvals/what/guidelines>

End Attachment A
