

Memorandum

To:	William Street Residential Pty Ltd	Date:	February 2026
Attention:	John Fitzgerald	Project No.:	208700.01
Email:	JFitzgerald@rebelproperty.com	Reference:	M.001.Rev0
Subject:	Response to DCCEEW for 164-194 William Street, Woolloomooloo		

This memorandum has been prepared in response to a letter (Reference OUT25/14282) from Rob Brownbill of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). Douglas' responses are presented below.

Attachment A - 1.1

Douglas have reported in Section 2.2 of our Groundwater Impact Assessment (GIA) report (208700.01.R.002.Rev1, dated 23 July 2025) [Douglas2025] the following;

"we expect that dewatering of the site will be achievable via conventional sumps and pumps and is expected to be redirected and discharged into council stormwater drains."

The design is currently for a sump and pump system. Seepage will be collected from strip drains behind shotcrete perimeter walls and gravel drainage below the slab which is directed to a series of sumps connected to a pumping system connected to the council stormwater system at street level. No other use of the collected groundwater is planned. If this changes we will revise the impact assessment.

Attachment A - 1.2

This is discussed in Section 10 of the Douglas2025 GIA and is summarised below.

Dewatering of groundwater for construction purposes constitutes an aquifer interference activity under the Water Management Act 2000 and may require a Water Access Licence (WAL) and appropriate water entitlement units (share and extraction components), depending on the water source and proposed take.

In accordance with the Water Management (General) Regulation 2025, extraction of water from the greater metropolitan region groundwater source for the purpose of construction dewatering are currently exempt from requiring a Water Access License (WAL) under the coastal construction of infrastructure exemption clause.

For long-term, continuous dewatering of the basement, the predicted groundwater inflows into the proposed basement in the base case are 0.4 ML per year (less than 3 ML per year), therefore the development does not to require a WAL as it meets exemption under Clause 19(b) of the Water Management (General) Regulation 2025.

Regarding the sensitivity case 2 from our report Douglas2025, a WAL should not be required as inflows for long-term dewatering for the drained basement are predicted to be no more than 3ML per year.

Should the monitoring of the actual inflow volume during the construction suggest it is likely to exceed 3 ML, a Water Access Licence would be required with appropriate groundwater share allocation from NRAR (1 water share per 1 ML). It is our understanding that small numbers of water shares are readily available on the market and this should not be an issue in the unlikely event that it is required.

Water take records are to be kept and provided to the Minister within 28 days of the end of water year and records kept for 5 years to claim the exemptions. We trust that the above is of assistance.

Douglas Partners Pty Ltd

A blue ink signature of Warren Smith, consisting of a stylized 'W' and 'S'.

Warren Smith
Geotechnical Engineer

Reviewed by

A blue ink signature of Scott Easton, featuring a stylized 'S' and 'E'.

Scott Easton
Principal