



OUT21/14901

Kendall Clydsdale
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NSW Department of Planning, Industry and Environment

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Dear Mr/Ms Clydsdale

**Central Coast Quarter – Stage 1, Northern Tower (SSD 23588910) –
Environmental Impact Statement (EIS)**

I refer to your email of 28 September 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The Central Coast Quarter proposed development involves the staged construction of 25 story mixed commercial and residential use space including a basement carpark with 4 parking levels. The concept stage was approved 2 years ago. The proposed development will require excavation into the water table and subsequent dewatering.

The proponent will need to demonstrate that it holds sufficient entitlement to account for groundwater take. Our recommendations and advice regarding water balance and licencing, and groundwater impacts and management are provided in **Attachment A**.

Any further referrals to DPIE Water and NRAR can be sent by email to landuse.enquiries@dpie.nsw.gov.au, or to the following coordinating officer within DPIE Water:

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

Yours sincerely

A handwritten signature in blue ink that reads 'Liz Rogers'.

Liz Rogers
Manager, Assessments, Knowledge Division
Department of Planning, Industry and Environment: Water
24 November 2021

Attachment A

Detailed advice to DPIE Planning & Assessment regarding the Central Coast Quarter – Stage 1, Northern Tower (SSD 23588910) – EIS

1.0 Water Balance, Take and Licencing

Recommendation – Prior to Approval

- 1.1** The Proponent should provide a consolidated site water balance including expected groundwater take to be intercepted during construction and operational phases.

Additionally, the proponent should demonstrate that any required groundwater entitlements can be obtained from the water source for the predicted groundwater dewatering.

Explanation

The EIS has not included a site water balance. As there is potentially long term de-watering we require a consolidated site water balance to be provided.

Recommendation – Post Approval

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

Explanation

Both the EIS and the Geotechnical report state that the groundwater levels are below excavation depths in some areas of the site. The geotechnical report expands on this to say groundwater is expected along the eastern boundary adjacent to Mann St following rainfall and long-term de-watering should be considered for the basement.

There is no mention of entitlement or a WAL for the project, but as dewatering is likely to occur a WAL will be required (unless an exemption applies). Additionally, there is currently no estimate of take provided. It is noted that the site water demand is to be met using stormwater re-use and potable water.

2.0 Groundwater Impact Assessment and Management

Recommendation – Prior to Approval

- 2.1** Undertake further groundwater impact assessments in accordance with the NSW Aquifer Interference Policy (AIP) (2012). This should include an:
- estimate of expected construction and operational dewatering volumes; and
 - address of the impacts of dewatering on licensed groundwater users and groundwater dependent ecosystems.

Explanation

DPIE Water notes that dewatering is defined as an aquifer interference activity. Therefore, an assessment undertaken in accordance with the AIP should be undertaken. Should the development require dewatering during construction and/or operational phases, the proponent needs to determine the volume of groundwater take to be intercepted and, unless an exemption applies, a WAL should be obtained for the determined take (please see **Recommendations 1.1 and 1.2**).

Users within 500m of the site have been identified, however there has been no assessment of the impacts on these users. Additionally, here has been no assessment or comment in relation to groundwater dependent ecosystems.

DPIE Water's guidelines - '*Minimum requirements for building site groundwater investigations and reporting*' (2021) provides useful guidance information regarding requirements for developers and consultants. This document sets out the requirements applying to commercial, residential and mixed-use building developments that incorporate basement levels and that require excavation. They are available at:

https://www.industry.nsw.gov.au/_data/assets/pdf_file/0004/343291/minimum-requirements.pdf

Recommendation – Post Approval

2.2 Consider re-designing the basement to be a fully tanked system.

Explanation

It should be noted that the permanent dewatering of basement car parks is not considered ecologically sustainable and should be avoided if possible.

2.3 The proponent should update the Acid Sulfate Soil Management Plan presented in Appendix Y to include:

- a. tabulated results from field and laboratory testing
- b. Appendix A Figures
- c. In lieu of undertaking further testing, justification should be provided as to why ASS testing was undertaken to a depth of 5m rather than that required for an excavation depth of 8.5m as detailed in Appendix X.

Explanation

- a. Field or laboratory results have not been provided for review. The assessment includes potential acid sulfate soil depths for the site, without justifying these depths with actual results.
- b. Figures are referenced in the document but no figures are provided.
- c. The ASSMAC 1998 manual requires that testing be undertaken to 1m below the lowest point in the excavation. Testing in the ASSMP (Appendix Y) is reported to have been undertaken to 5m depth however the Geotechnical report (Appendix X) states that the excavation depth will be to 8.5m. This would suggest an ASS testing depth of 9m.

End Attachment A