OUT18/13113

Emily Dickson
Senior Planning Officer
NSW Department of Planning and Environment

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Dear Ms Dickson

Mixed use development at 35 Honeysuckle Drive (8999)
EIS Exhibition

I refer to your email of 21 August 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries. Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The department provides the following comments and recommendations for consideration in assessment of the proposal.

DoI Water

Department of Industry – Water (DoI – Water) seeks clarification on the following points:

- Appendix AD (Groundwater Inflow Analysis) outlines Case A and B for groundwater rates (page 12). DoI – Water requests the Case B rate is verified to confirm the groundwater take per day equals 12900 to 23100 Kilolitres or Litres.
- Appendix AD (Groundwater Inflow Analysis) outlines a temporary groundwater extraction licence will need to be sought from WaterNSW. The temporary groundwater extraction licence is to be obtained by the Natural Resource Access Regulator (NRAR), within the Department of Industry – Lands and Water.

Notwithstanding the points of clarification above, DoI – Water recommends the following conditions of consent should the project be approved:

- An authorisation must be obtained for the take of groundwater as part of the activity. Groundwater must not be pumped or extracted for any purpose other than temporary construction dewatering at the site identified in the development application.
- The design and construction of the building must prevent any take of groundwater after the authorisation has lapsed by making any below-ground levels that may be impacted by any water table fully watertight for the anticipated life of the building. Waterproofing of below-ground levels must be sufficiently extensive to incorporate adequate provision for unforeseen high water table elevations to prevent potential future inundation.
- Sufficient permanent drainage must be provided beneath and around the outside of the watertight structure to ensure that natural groundwater flow is not impeded and:
    - any groundwater mounding at the edge of the structure must be at a level not greater than 10 % above the level to which the water table might naturally rise in the location immediately prior to the construction of the structure; and
    - elevated water table must be more than 1.0 m below the existing natural ground surface to prevent water penetrating surface areas; and

    - where the habitable part of the structure (not being footings or foundations) is founded in bedrock or impermeable natural soil then the requirement to maintain groundwater flows beneath the structure is not applicable.
- Construction methods and material used in construction must be designed to account for the likely range of salinity and pollutants which may be dissolved in groundwater, and must not themselves cause pollution of the groundwater.
- Groundwater quality testing of samples taken from outside the footprint of the proposed construction, with the intent of ensuring that as far as possible the natural and contaminant hydrochemistry of the potential dewatered groundwater is understood, must be conducted on a suitable number of samples and tested at a certified laboratory.
- Details of the sampling locations and the protocol used, together with the test results must be accompanied by laboratory test certificates. An assessment of results must be done by suitably qualified persons with the intent of identifying the presence of any contaminants and comparison of the data against accepted water quality objectives or criteria for the intended dewatering purpose. In the event of adverse quality findings, a plan must be developed to mitigate the impacts of the hydrochemistry on the dewatered groundwater.
- The method of disposal of pumped water must be nominated (i.e. reinjection, drainage to the stormwater system or discharge to sewer) and a copy of the written permission from the relevant controlling authority must be provided in a report to be provided to the Natural Resource Access Regulator with the application for the authorisation. The disposal of any contaminated pumped groundwater (sometimes called “tailwater”) must comply with the provisions of the Protection of the Environment Operations Act 1997 and any requirements of the relevant controlling authority.
- Contaminated groundwater (i.e. above appropriate NEPM 2013 thresholds) must not be reinjected into any aquifer. The reinjection system design and treatment methods to remove contaminants, if proposed, must be nominated and included in a report to be provided to the Natural Resource Access Regulator with the application for the authorisation. The quality of any pumped water that is to be reinjected must be demonstrated to be compatible with, or improve, the intrinsic or ambient groundwater in the vicinity of the reinjection site.
- Daily measurements of water levels from monitoring bores outside basement support walls, weekly measurements of groundwater and discharge water quality, and weekly measurements of pumped volumes must be recorded by the proponent throughout the construction phase of the development and provided to the Natural Resource Access Regulator in raw data form and in a completion report prior to building certification.

Yours sincerely

Alison Collaros
A/Manager, Assessment Advice
Lands and Water - Strategy and Policy
8 October 2018