

17 April 2025

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Our Ref: IDAS1160300

The General Manager
Northern Beaches Council

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DRAINED BASEMENT NOT RECOMMENDED

Dear Sir/Madam

Proposed Development DA2025/0077

**Lot 1 DP 595422, Lot 45 DP974653, Lot 1 DP 578401, Lot 1 DP 100563 and Lot 1 DP 900061
No. 10, 16, 20, 22 and 28 Lawrence Street, Freshwater NSW 2096**

Reference is made to (Planning Portal No.CNR-78700 / A-97012).

WaterNSW and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) have assessed the application and DCCEEW have advised a drained basement is not recommended.

The following is provided:

'The issue of General Terms of Approval permitting a drained basement is NOT RECOMMENDED. The applicant has not demonstrated that a drained basement will cause no more than minimal harm.'

DCCEEW have provided the following:

'The proposed drained basement design as it has been presented cannot be supported as insufficient hydrogeological information of the required standard has been supplied.'

Note: The department have concerns regarding the absence of groundwater quality data, the model assumptions and the lack of detail in the supplied documentation that currently does not meet the [Minimum Requirements for Building Site Groundwater Investigations and Reporting \(DPIE, 2022\)](#).

The Preliminary Site Investigation report provided (EI, 2024c) identified the current and historical use of the site included dry-cleaning businesses and that there is a potential for contamination to exist at the site. No groundwater quality data has been provided to confirm the risk of a drained basement is low and acceptable. The effects of the proposed drained basement design during both construction and the long-term have not been adequately determined and demonstrated to be of minimal impact.'

The issue of General Terms of Approval permitting a tanked basement is recommended.

Please advise WaterNSW within the next 21 days, being **Friday 9 May 2025** of the applicant's acceptance of tanked GTA. If the applicant does not accept tanked GTA or if no response is received, WaterNSW will refuse to issue GTAs under the Water Management Act 2000.

Yours sincerely,

Tracy White

Tracy White
Water Regulation Specialist