

The General Manager  
Northern Beaches Council

Our ref: IDAS1161660  
Your ref: DA2024/1303

Email: [daplanningportal@northernbeaches.nsw.gov.au](mailto:daplanningportal@northernbeaches.nsw.gov.au)

18 June 2025

Dear Applicant,

**Integrated Development Referral – General Terms of Approval  
Proposed Development DA2024/1303  
Lot 31 DP 366454, Lot 2590 DP 752038 and Lot 11 DP 626916, 20-24 Melwood Avenue, Forestville  
NSW 2087**

I refer to your recent request regarding an integrated Development Application (DA) proposed for the above location. Please find attached the WaterNSW General Terms of Approval (GTA) for part of the proposed development requiring a Water Supply Work approval under the *Water Management Act 2000* (WM Act), as detailed in the subject DA.

Please note Council's statutory obligations under section 4.47(3) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) which requires a consent, granted by a consent authority, to be consistent with the general terms of any approval proposed to be granted by the approval body.

If the proposed development is approved by Council, WaterNSW requests these GTA be included (in their entirety) in Council's development consent. Please also note WaterNSW requests notification:

- if any plans or documents are amended and these amendments significantly change the proposed development or result in additional works or activities that relate to any excavation which interferes with an aquifer. WaterNSW will ascertain from the notification if the amended plans require review of the GTA. This requirement applies even if the amendment is part of Council's proposed consent conditions and do not appear in the original documentation.
- if Council receives an application under s4.55 of the EP&A Act to modify the development consent and the modifications change the proposed work or activities described in the original DA.
- of any legal challenge to the consent.

Dewatering activity cannot commence before the applicant applies for and obtains an approval, WaterNSW recommends the following condition be included in the development consent:

**The attached GTA issued by WaterNSW do not constitute an approval under the *Water Management Act 2000*.** The development consent holder must apply to WaterNSW for a Water Supply Work approval **after consent** has been issued by Council **and before** the commencement of any dewatering activity.

A completed application form must be submitted to WaterNSW together with any required plans, documents, application fee, and proof of Council's development consent.

Application forms are available from the WaterNSW website which can be found [here](#).

WaterNSW requests that Council provides a copy of this letter to the development consent holder.

WaterNSW also requests a copy of the determination for this development application be provided by Council as required under section 4.47(6) of the EP&A Act.

#### **Information to the proponent:**

- Site-specific data gathering to meet the information required by the '[Minimum Requirements for Building Site Groundwater Investigations and Report](#)' must be continued.

The Dewatering Management Plan must be informed by in-situ data, site conceptualisation, an assessment of impact, estimated volumes of take, metering, monitoring and mitigation arrangements.

- GTAs are issued, assuming no more than 2.9 ML/Year take during construction.

At the time of water supply work approval and licence application, should the take volume or the impact exceed what was estimated at the time of consent, or should it be poorly informed, then signification delay could occur in the approval and modification of consent could be required.

- Any GTAs issued are based on the predicted take volume identified in the application information. Should at the time of water supply work approval/licence application, the take volume or the impacts exceed what was estimated at the time of consent, or it is shown that the development application was poorly informed, then significant delay could occur in obtaining an approval and modification of consent could be required.
- Site-specific data gathering to meet or exceed the '[Minimum Requirements for Building Site Groundwater Investigations and Reporting](#)' must be continued for the period between the determination of the development application by council and the lodgement of a water supply works approval application with WaterNSW (should a consent be granted), this data must be provided with any water supply work approval or licence applications submitted.
- A minimal harm assessment to satisfy the requirements of the NSW [Aquifer Interference Policy](#) is to be included in the Dewatering Management Plan to support any water supply work approval or licence applications.

- The applicant must demonstrate in the Dewatering Management Plan that take during construction does not cause drawdown greater than 2m at any receptor within a minimum of 500m of the site and detail the make good arrangements that will be implemented should impact to receptors exceed 2m.

Note: receptors could include but are not limited to third party water supply works (bore, well, spearpoint), groundwater dependent ecosystems, wetlands and National Parks, surface water sources, water dependent culturally significant sites.

- A work approval application must be lodged to authorise pumping during construction and the approval must be obtained prior to the commencement of any dewatering activity.
- A separate work approval application must be lodged to authorise the ongoing take of groundwater, the approval must be obtained prior to the determination of an Occupation Certificate.
- An extraction limit will be determined by the Department of Climate Change, Energy, the Environment and Water based on the information provided at the time of consent and further information such as the Dewatering Management Plan provided with the water supply work approval application. The extraction limit will be included as a condition on the water supply work approval.
- Any impact because of construction and/or pumping from or near any areas identified with potential for acid sulfate soils and/or contaminated or poor-quality groundwater, must be characterised and management actions documented in the Dewatering Management Plan.

Note: A water supply work approval must not be granted without the applicant demonstrating that extraction will not induce migration of contamination in the aquifer or connected water sources.

- The authorisation will be issued for the purpose of temporary construction dewatering only and it does not constitute any form of approval for ongoing pumping of groundwater from basement levels after the building is issued an occupation certificate.

Yours sincerely

*Tracy White*

Tracy White  
Water Regulation Specialist

## General Terms of Approval

for proposed development requiring approval  
under s89, 90 or 91 of the Water Management Act 2000

**Reference Number:** IDAS1161660

**Issue date of GTA:** 18 June 2025

**Type of Approval:** Water Supply Work

**Description:** 80mm submersible pump

**Location of work/activity:** 20-24 Melwood Avenue Forestville NSW 2087

**DA Number:** DA2024/1303

**LGA:** Northern Beaches Council

**Water Sharing Plan Area:** Greater Metropolitan Region Groundwater Sources 2023

**The GTA issued by WaterNSW do not constitute an approval under the *Water Management Act 2000*.** The development consent holder must apply to WaterNSW for the relevant approval **after development consent** has been issued by Council **and before** the commencement of any work or activity.

Condition Number	Details
	<b>Dewatering</b>
GT0119-00001	All extracted groundwater must be discharged from the site in accordance with Council requirements for stormwater drainage or in accordance with any applicable trade waste agreement.
GT0122-00001	Construction Phase Monitoring programme and content: a) A monitoring programme must be submitted, for approval, to WaterNSW with the water supply work application. The monitoring programme must, unless agreed otherwise in writing by WaterNSW, include matters set out in any Guide published by the NSW Department of Planning Industry and Environment in relation to groundwater investigations and monitoring. Where no Guide is current or published, the monitoring programme must include the following (unless otherwise agreed in writing by WaterNSW): i. Pre-application measurement requirements: The results of groundwater measurements on or around the site, with a minimum of 3 bore locations, over a minimum period of 3 months in the six months prior to the submission of the approval to WaterNSW. ii. Field measurements: Include provision for testing electrical conductivity; temperature; pH; redox potential and standing water level of the groundwater; iii. Water quality: Include a programme for water quality testing which includes testing for those analytes as required by WaterNSW; iv. QA: Include details of quality assurance and control v. Lab assurance: Include a requirement for the testing by National Association of Testing Authorities accredited laboratories. b) The applicant must comply with the monitoring programme as approved by WaterNSW for the duration of the water supply work approval (Approved Monitoring Programme)
GT0123-00001	(a) Prior to the issuing of the occupation certificate, and following the completion of the dewatering activity, and any monitoring required under the Approved Monitoring Programme, the applicant must submit a completion report to WaterNSW. (b) The completion report must, unless agreed otherwise in writing by WaterNSW, include matters set out in any guideline published by the NSW Department of Planning Industry and Environment in relation to groundwater investigations and monitoring. Where no guideline is current or published, the completion report must include the following (unless otherwise agreed in writing by WaterNSW): 1) All results from the Approved Monitoring Programme; and 2) Any other information required on the WaterNSW completion report form as updated from time to time on the WaterNSW website. c) The completion report must be submitted using "Completion Report for Dewatering work form" located on WaterNSW website <a href="http://www.watarnsw.com.au/customer-service/water-licensing/dewatering">www.watarnsw.com.au/customer-service/water-licensing/dewatering</a>

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<b>Description:</b>	80mm submersible pump
<b>Location of work/activity:</b>	20-24 Melwood Avenue Forestville NSW 2087
<b>DA Number:</b>	DA2024/1303
<b>LGA:</b>	Northern Beaches Council
<b>Water Sharing Plan Area:</b>	Greater Metropolitan Region Groundwater Sources 2023
GT0150-00001	The extraction limit shall be set at a total of 3ML per water year (being from 1 July to 30 June). The applicant may apply to WaterNSW to increase the extraction limit under this condition. Any application to increase the extraction limit must be in writing and provide all information required for a hydrogeological assessment. Advisory note: Any application to increase the extraction limit should include the following: - Groundwater investigation report describing the groundwater conditions beneath and around the site and subsurface conceptualisation - Survey plan showing ground surface elevation across the site - Architectural drawings showing basement dimensions - Environmental site assessment report for any sites containing contaminated soil or groundwater (apart from acid sulphate soils (ASS)) - Laboratory test results for soil sampling testing for ASS - If ASS, details of proposed management and treatment of soil and groundwater. Testing and management should align with the NSW Acid Sulphate Soil Manual
GT0151-00001	Any dewatering activity approved under this approval shall cease after a period of two (2) years from the date of this approval, unless otherwise agreed in writing by WaterNSW (Term of the dewatering approval). Advisory note: an extension of this approval may be applied for within 6 months of the expiry of Term.
GT0152-00001	This approval must be surrendered after compliance with all conditions of this approval, and prior to the expiry of the Term of the dewatering approval, in condition GT0151-00001. Advisory note: an extension of this approval may be applied for within 6 months of the expiry of Term.
GT0155-00001	The following construction phase monitoring requirements apply (Works Approval): a. The monitoring bores must be installed in accordance with the number and location shown, as modified by this approval, unless otherwise agreed in writing with WaterNSW. b. The applicant must comply with the monitoring programme as amended by this approval (Approved Monitoring Programme). c. The applicant must submit all results from the Approved Monitoring Programme, to WaterNSW, as part of the Completion Report
GT0174-00001	Construction phase monitoring bore requirements GTA: a) Monitoring bores are required to be installed and collecting data prior for at least 3 months prior to submitting a water supply work approval b) A minimum of three monitoring bore locations are required at or around the subject property, unless otherwise agreed by WaterNSW. c) The location and number of proposed monitoring bores must be submitted for approval, to WaterNSW and should be submitted prior to the application for a water supply work approval. d) The monitoring bores should be used to develop a water table map for the site and its near environs. e) The monitoring bores must be protected from construction damage. Advisory note: no approval under the Water Management Act 2000 is required for these monitoring bores provided that they extract less than 3ML/water year.
GT0279-00001	A construction certificate can be issued for excavation work in accordance with a valid development consent, however dewatering cannot take place without an Approval being granted by Water NSW for any water supply works required by the development. If the excavation work will or is likely to require dewatering, the applicant must apply and obtain, an approval under the Water Management Act

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2000 prior to any dewatering taking place and notify WaterNSW of the programme for the dewatering activity including the commencement and proposed completion dates of the dewatering activity. Advisory Note: An approval under the Water Management Act 2000 is required to construct and/or install the water supply works. For the avoidance of doubt, these General Terms of Approval do not represent any authorisation for the take of groundwater, nor do they constitute the grant or the indication of an intention to grant. A water use approval may also be required, unless the use of the water is for a purpose for which a development consent is in force.

GT0280-00001 A water access licence, for the relevant water source, must be obtained and nominate an occupational phase water supply work approval, to account for ongoing dewatering, unless an exemption applies.

GT0281-00001 A water access licence, for the relevant water source, must be obtained prior to extracting groundwater, unless an exemption applies. Advisory Note: See Schedule 4 of the Water Management (General) Regulation 2025.

## **SCHEDULE 1**

The plans and associated documentation listed in this schedule are referred to in general terms of approval (GTA) issued by WaterNSW for integrated development associated with DA2024/1303 as provided by Council:

- Groundwater Assessment - 22 Melwood Ave, Forestville NSW, report prepared by Forestville RSL Club KD2025/10, Revision D, 13/02/2025, prepared by Katarina David.
- Geotechnical Investigation Report, proposed RSL Club Redevelopment, 20-22 Melwood Avenue, Forestville, prepared for the Forestville RSL Club Ltd, Report ID: E24016FOR-R01F (REV 1), dated 13 May 2025, Revision No.: 1, prepared by geo-environmental Engineering.

## Attachment A Minimum requirements assessment

Section	Minimum information	Comment
Introduction (General description of the site)	<ul style="list-style-type: none"> <li>Property address and lot and deposited plan (DP) numbers</li> <li>Description of the proposed building development</li> <li>Timing details of the building dewatering schedule and the broader construction schedule</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>Property address provided</li> <li>Description of the proposed building development provided</li> <li>Timing details of the building dewatering schedule provided</li> </ul> <p><u>Unsatisfactory</u></p> <ul style="list-style-type: none"> <li>Property lot and DP numbers not provided</li> </ul>
Site geology (Conceptualisation based on results of comprehensive intrusive investigations at the site)	<ul style="list-style-type: none"> <li>General discussion of ground surface elevation across the site</li> <li>Tabulation of the subsurface layers identified from intrusive investigations at the site, including depths and thicknesses</li> <li>Detailed material descriptions of each layer encountered during intrusive investigations</li> <li>Determinations of potential acid sulphate soils (PASS) and actual acid sulphate soils (ASS) from multiple site-specific samples and laboratory analysis</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>General discussion of site surface elevation provided</li> <li>Tabulation of subsurface layers and detailed material descriptions provided in the geotechnical report (GEE, 2025)</li> <li>Acid sulfate soil risk discussed in the geotechnical report (GEE, 2025)</li> </ul> <p><u>Unsatisfactory</u></p> <ul style="list-style-type: none"> <li>The groundwater assessment report (K. David, 2025) should be a standalone document and include a summary of the site geology information</li> </ul>
Site hydrogeology (Conceptualisation and aquifer conceptualisation based on results of comprehensive intrusive)	<ul style="list-style-type: none"> <li>Depth to groundwater based on at least daily measurements from within a six-month period before lodgement of the application</li> <li>Basic statistics (minimum, average, median, maximum) of groundwater measurements in metres depth</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>Continuous groundwater level monitoring over a 3-month period provided</li> <li>Hydraulic conductivity test results provided</li> </ul>



<p>investigations at the site)</p>	<p>below ground level and metres elevation referenced to AHD</p> <ul style="list-style-type: none"> <li>• Prediction of the highest groundwater level in metres depth below ground level and metres elevation referenced to AHD under wet weather conditions (where the predevelopment monitoring does not, or is unlikely to, extend beyond two years)</li> <li>• Hydraulic conductivity test results for every substantial lithological layer to be intersected by the excavation (tested at least three times each to demonstrate repeatability)</li> <li>• Tabulated details and included to-scale plan diagram of at least three groundwater monitoring locations distributed across the site positioned to allow triangulation of groundwater flow directions</li> <li>• Like-for-like replacement protocols for monitoring bores that may be damaged or destroyed by the proposed construction activity</li> </ul>	<ul style="list-style-type: none"> <li>• Tabulated details of the monitoring bores and plan diagram included interpreted groundwater flow direction provided</li> <li>• Baseline groundwater quality data provided</li> </ul> <p><b><u>Unsatisfactory</u></b></p> <ul style="list-style-type: none"> <li>• The basic groundwater level statistics provided and discussion of groundwater level fluctuations are not consistent with the information presented in the hydrographs. I.e., Figure 4 shows that the groundwater levels in all three monitoring bores during the 3-month period did not drop below 124 mAHD, but Table 2 (groundwater level fluctuation) details minimum groundwater levels from 117.9 to 122.3 mAHD for all three bores. Groundwater levels appear to have fluctuated or declined by about 0.5 m in all three monitoring wells rather than by 4.8 to 3 m as discussed in the groundwater assessment report.</li> <li>• The maximum bore depth drilled for site investigation is 10.23 m (BH101) which is less than the required investigation depth for a 3-level basement as per the minimum requirements.</li> <li>• Prediction of highest groundwater level under wet weather conditions not explicitly started in the report</li> <li>• Like-for-like replacement protocol not provided</li> </ul>
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<p>Analytical or numerical groundwater flow modelling (Groundwater take and impact predictions based on appropriate modelling)</p>	<ul style="list-style-type: none"> <li>• Description of the groundwater flow model used (cannot be a geotechnical pore pressure or seepage inflow model)</li> <li>• Demonstration that conceptualisation represents site conditions</li> <li>• Details of the site-specific information used to conceptualise, construct, calibrate and validate the model</li> <li>• All assumptions made and those inherent in the modelling approach</li> <li>• Details of the adopted model parameters</li> <li>• Predictions of the maximum extent of the cone of depression resulting from the full duration of the proposed dewatering pumping</li> <li>• Comprehensive impact assessment in accordance with the NSW Aquifer Interference Policy requirements and criteria</li> <li>• Nomination of groundwater trigger levels to activate contingency measures should unforeseen impacts occur</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>• Description of analytical groundwater flow model used</li> <li>• The subsurface appears to have been appropriately conceptualised</li> <li>• Details of the site-specific information used and adopted model parameters provided</li> <li>• Model specific assumptions provided</li> <li>• Prediction of the maximum extent of the cone of depression provided</li> <li>• Impact assessment in accordance with the NSW Aquifer Interference Policy provided</li> </ul> <p><u>Unsatisfactory</u></p> <ul style="list-style-type: none"> <li>• Stated groundwater level fluctuations which are inconsistent with the hydrographs provided have been used incorrectly to justify potential off-site drawdown impacts</li> <li>• Nomination of groundwater triggers levels not provided</li> </ul>
<p>Building design (Accurate dimensions for the basement footprint in three dimensions and extent of the required drawdown)</p>	<ul style="list-style-type: none"> <li>• Clearly documented basement dimensions on all subsurface floor plans (to outside the design walls for the entire basement footprint)</li> <li>• Clearly documented excavation design on two section diagrams (oriented approximately perpendicular to each other and extending across the site)</li> <li>• Identification of critical levels associated with the excavation and</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>• Basement footprint plans provided</li> <li>• Basement cross-sections provided</li> <li>• Proposed excavation support method discussed</li> <li>• Drainage system discussed</li> </ul> <p><u>Unsatisfactory</u></p>

	<p>building design in metres elevation referenced to AHD on the sections as follows:</p> <ul style="list-style-type: none"> <li>– ground surface level</li> <li>– highest predicted groundwater level</li> <li>– lowermost basement finished floor level</li> <li>– substructure floor level for lift pits or stormwater tanks extending beneath lowermost basement</li> <li>– bulk excavation level</li> <li>– required pumping water level</li> <li>– base of aquifer</li> </ul> <ul style="list-style-type: none"> <li>• Proposed excavation support method and the degree of watertightness expected from the completed wall system</li> <li>• Waterproofing methodology to be used to reduce the permeability of the wall and floor system to complete a watertight basement</li> <li>• Drainage system to be installed around and beneath the watertight basement to prevent obstruction of groundwater flow and consequent adverse effects (for example, waterlogging or increased discharge on neighbouring properties)</li> </ul>	<ul style="list-style-type: none"> <li>• Critical levels associated with the excavation and building design not all provided</li> </ul>
<p><b>Water take</b> (Calculation of take volume and identification of any licensing requirements)</p>	<ul style="list-style-type: none"> <li>• Weekly and total water take requirements based on the groundwater flow modelling</li> <li>• Discussion of the licensing requirements, including availability of shares in the groundwater source</li> </ul>	<p><u><b>Satisfactory</b></u></p> <ul style="list-style-type: none"> <li>• Daily and total water take during construction provided (2.9 ML/year)</li> <li>• Daily and annual water take ongoing provided (2.5 ML/year)</li> <li>• Licensing requirements discussed</li> </ul>

	<ul style="list-style-type: none"> <li>• Need for a water access licence to authorise the volume of groundwater predicted to be taken during dewatering pumping</li> <li>• Need for an approval to authorise the bores or structure used to take groundwater</li> </ul>	
<b>Monitoring and reporting</b> <b>(Details of the groundwater management actions for the project)</b>	<ul style="list-style-type: none"> <li>• Establishment of trigger levels (based on monitoring data gathered since project commencement and supplemented by measurements following development consent, as well as trends analysis if necessary) that are to be applied once construction commences to identify whether adverse impacts are occurring</li> <li>• Description of the response actions if groundwater reaches or exceeds the trigger levels or points</li> <li>• Scheduling and content of the frequent regular recording of the monitoring measurements, data-handling protocols and reporting processes</li> <li>• Notification plan to the relevant agency should unforeseen impacts occur or if groundwater exceeds triggers</li> <li>• Nomination of the due date for submitting the dewatering completion report</li> </ul>	<p><b><u>Satisfactory</u></b></p> <ul style="list-style-type: none"> <li>• Frequency of monitoring requirements provided</li> </ul> <p><b><u>Unsatisfactory</u></b></p> <ul style="list-style-type: none"> <li>• Trigger levels and response actions not provided</li> <li>• Notification plan not provided</li> <li>• Due date for submitting the dewatering completion report not provided</li> </ul>
<b>Figures</b> <b>(Illustrations and diagrams showing relevant information)</b>	<ul style="list-style-type: none"> <li>• Diagram illustrating location of property</li> <li>• Site survey illustrating spot elevations and contours</li> <li>• Detailed design plan for each basement level footprint with major</li> </ul>	<p><b><u>Satisfactory</u></b></p> <ul style="list-style-type: none"> <li>• Diagram of property location provided</li> <li>• Site survey provided in the geotechnical report (GEE, 2025)</li> </ul>

	<p>axis dimensions (to outside each basement wall) clearly documented</p> <ul style="list-style-type: none"> <li>Revised hydrogeological section diagrams based on detailed design plans (to scale and with critical levels clearly identified) oriented approximately perpendicular to each other</li> <li>Plan diagram of the three monitoring locations used for groundwater measurements and sampling relative to basement footprint</li> <li>A plan illustration of the extent of the cone of depression and capture zone that will be developed from the pumping required to dewater the site using the predicted highest groundwater level elevation</li> </ul>	<ul style="list-style-type: none"> <li>Details design plans provided in the geotechnical report (GEE, 2025)</li> <li>Hydrogeological cross-sections provided</li> <li>Plan diagram of monitoring locations included the basement footprint provided</li> </ul> <p><u>Unsatisfactory</u></p> <ul style="list-style-type: none"> <li>Plan diagram of the cone of depression and capture zone not provided</li> <li>Limited detailed design plans provided in the groundwater assessment report (K. David, 2025)</li> </ul>
<p><b>Attachments (Supporting documentation)</b></p>	<ul style="list-style-type: none"> <li>Site borehole logs</li> <li>All raw measurement data in electronic format</li> <li>All field and laboratory test result data in electronic format</li> <li>Copies of written agreements for variations</li> <li>Signed statement of compliance with these requirements by the author (a suitably qualified person)</li> </ul>	<p><u>Satisfactory</u></p> <ul style="list-style-type: none"> <li>Site borehole logs provided</li> </ul> <p><u>Unsatisfactory</u></p> <ul style="list-style-type: none"> <li>Electronic data not provided</li> <li>Signed statement of compliance not provided</li> </ul>