



MLC School Rowing Program  
Rowley Street  
Burwood NSW 2134

14 November 2019

Major Projects  
NSW Department of Planning, Industry and Environment  
<https://www.planningportal.nsw.gov.au/major-projects/project/10011>

Dear Sir/Madam

**Re SSD 8924 - New Sydney Fish Market Concept and Stage 1 Early Works**

We write on behalf of the MLC School Rowing program which operates out of the Sydney University Sheds on Blackwattle Bay.

We currently coach 35 - 50 girls aged between 10 to 18 years in a variety of rowing boats, from singles to eights. Together with our coaches, we have 5-15 boats on the water at a time. Training is held from 5.15-7.30am six mornings a week, and 3.30 – 6.00pm four afternoons a week. We conduct our program from February to December each year.

MLC Rowing supports the overall Fish Markets development. It will be a positive outcome for the local area and redevelop a site which has been in much needed TLC for some time. We also acknowledge the consultation process with the Fish Markets and Infrastructure NSW has been positive and inclusive.

We do however have some concerns about the development and the construction process. Our primary concern is the safety of our students and coaches, and ensuring that the rowing program can be maintained during construction and once development is completed.

We are concerned about some important aspects of the proposed development and request:

- Improved analysis of the impact on water traffic is undertaken and considered in the design of the master plan;
- Modifications be made to the design of the Eastern Wharf to ensure safety of all rowers, and small boat users (dragon boats/kayakers);
- The implementation of necessary safety provisions during the early demolition and construction contracts to ensure safety of all water users during the lengthy building process; and
- A process by which all recreation clubs can be notified of increased construction traffic (water traffic) during development so that programs can accommodate changes and maintain safety .

## **Objections**

We object to a number of important aspects of the proposed development:

### **1. Shortening of rowing course**

We acknowledge that there has been considerable and constructive consultation between Sydney Fish Markets, Infrastructure NSW and recreational water users concerning the proposed western trawler wharves, and that the resulting proposed trawler wharf layout is a significantly better outcome for us than the indicative design of 2018.

The current design includes an Eastern public wharf designed to accommodate motorised recreational vessels and a ferry stop. The proposed wharf structure extends an additional 65m into Blackwattle Bay and it is proposed that the current agreed rowing course be shortened by 45m to accommodate for the new wharf.

We recognise compromise in a complex project like this is required, but the correct impact on the rowing course of the current design of the East wharf plan is much greater than currently noted and creates an unnecessary safety risk. This is not helped by the omission of Glebe Rowing Club and its pontoon from most of the major relevant diagrams including those in A3 Vol Appendix 1 Concept Drawings and A3 Vol Appendix 2 Concept Design Report Part 3.

The current rowing course is designed to ensure rowers travel 'with traffic' to take a safe position on the opposite side of the Bay and in accordance with Roads and Maritime Boating Handbook. From that position they safely turn before heading down the east side of the Bay closer to the shore thus avoiding any traffic in the opposite direction that has drifted to the middle of the Bay.

We currently muster and turn where the Eastern Wharf is planned to end. Even with a reduced rowing route, we estimate that our turning circle would put us directly in front of the new wharf. When including ferry services likely to be placed at the front of the wharf, rowing boats would be mustering around 20m from the wharf.

We request that the wharf be shortened by at least 25m to restore the safe distance from the actual turning circle of boats and the wharf.

### **Water traffic assessment**

The current DA has no adequate assessment of future volume of water traffic. With a proper assessment, we feel that the development proposal could be improved, and the risks to safety posed by plans such as the east wharf could be improved.

The submitted EIS (p.18) and the NIA (p.20) both fail to grasp the full extent of recreational use of the Bay. Data was gathered from websites, but without consultation with recreational users of the Bay. Examples of missing information include:

- Reference to the rowing course as voluntary (p. 19 NIA). In fact, the course navigation plan was negotiated and agreed by RMS and Rowing NSW.
- Lack of data of the frequency of use of the rowing course. The NIA reports the course is used most weekday mornings and weekends but appears to have no quantification of the recreational use. The comment does not pick up, for example, on our schoolgirl rowers or those of other clubs such as Glebe Rowing Club, on weekday afternoons.

- There appear to be no estimates of day-tripper arrivals to the Fish Markets by small powered vessels – either currently or into the future – to justify the size and positioning of the Eastern wharf.
- There appear to be no estimates of either the current use of the public ferry or of the size of increases in its use in the future. We have recently seen the introduction of the on-demand ferry service, which we expect will grow once the Fish Market development is complete.

The current water traffic volume assessment means that the analysis of potential collision risks is inadequate, and neither the government nor water users can be assured the risks have been properly addressed. This is of high concern to our program, as safety of our schoolgirl rowers and our coaches, is paramount.

#### **Safety provisions during construction**

It is expected that the construction phase will create some 4-5 years of disruption for water activity by recreational users. We note the DA makes provision to minimize the disruption and safety risk during this phase.

We agree with the need for these safety measures and believe that these should be reflected in the tender and terms for the construction contract, including:

- Transit of any floating plant should account for navigation restrictions and general safety requirements including keeping a good lookout for recreational vessels
- Clearly marked floating boom and silt curtain to assist in defining no-go areas for non-powered craft during construction, and clarification of any potential closure of the bay if silt becomes an issue
- An appropriate program of consultation and information to ensure that stakeholders including recreational water users are fully notified of proposed construction activities. An alert service would allow our coaches to best plan for disruptions/high water traffic and ensure safety of our schoolgirl rowers.

Thank you for this opportunity to comment on the proposal. We look forward to continuing to be part of the consultation process.

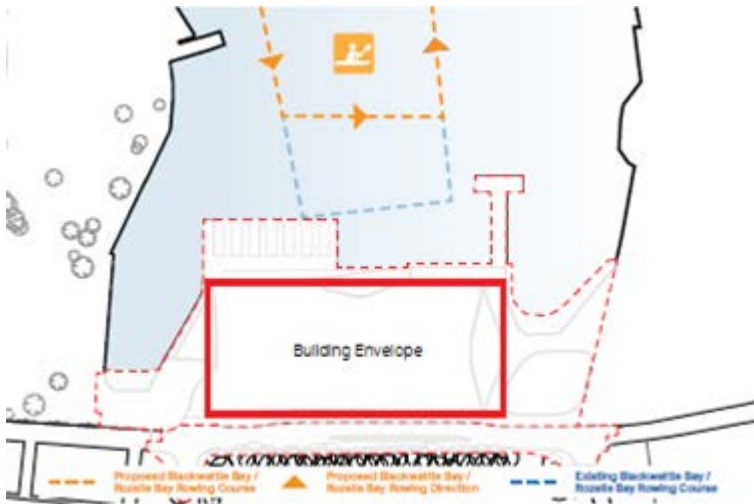
Yours sincerely



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**Appendix 1:** Incorrect diagram of the rowing course as drawn in the EIS



**Reference:** Navigational Impact Plan, page 129

**Appendix 2:** Correct diagram of rowing course (quoted but not referred to in the Navigational Impact Assessment)

To demonstrate the safety concerns, the diagram below includes what has been omitted from the diagram in the NIP such as:

1. the Glebe Rowing Club boat wharf;
2. the actual current path and direction of boats heading from the pontoon and travelling West to East along the Bay along the current agreed Rowing course (the blue line);
3. the proposed shortened new rowing course (that reflects more accurately the safe West and East travel lanes and avoiding leaving the pontoon at right angles to oncoming traffic) (the gold line); and
4. the likely presence of a ferry stationed on the wharf (turning circle not included)

