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November 10, 2019

Planning and Assessment,  
Department of Planning, Industry and Environment,  
GPO Box 39,  
Sydney, NSW 2001  
Attention: Director – Key Sites Assessments

**Re SSD – 8924 The new Sydney Fish Market Concept and Stage 1.  
SSD – 8925 The new Sydney Fish Market Stage 2**

### **LETTER OF OBJECTION**

Dear Sir/Madam,

**I object** to the above DAs, and instead support redevelopment of the Sydney Fish Market (SFM) on its current site at Banks Street.

**I oppose** the development of the proposed Sydney Fish Markets on Bridge Road, a building that would jut into the Bay, because of:

- the potential serious risk of contamination of the waters of Blackwattle Bay from a range of toxic chemicals in the sediment;
- the alienation of Wentworth Park from the Bay;
- the extension of the waterfront walk, with steps or a lift inside the building, over the proposed SFM;
- the loss of opportunity to restore the waterfront along Bridge Road;
- the building of what is essentially a food mall at taxpayer expense,
- and the extraordinary cost to taxpayers of at least \$750, a cost that would be much lower if the SFM were built on the current site.

I have lived at 2 Garran Lane, Glebe, 100 metres from Blackwattle Bay for nearly 38 years. I hold a deep affection for the Bay and for its waters.

I have lived by Sydney Harbour, west of the Bridge, for most of my life, growing up in Drummoyne and Balmain, and living in Glebe for over 40 years. I am also a keen sailor, I sail at Drummoyne Sailing Club and I have written a history of the sailing club I belonged to in Balmain (Snails Bay Sabot Sailing Club 1962 – 1973, a sailing club for children in Balmain, 2015).

I have walked by Blackwattle Bay nearly every day since I have lived here.

Over the last 50 years the waterfront has changed from industrial to parkland, in large part due to the efforts of The Glebe Society (TGS) of which I am a member.

For our 50th anniversary this year I documented the activism of TGS and the development of the Glebe Foreshore walk, which now extends for 2.2 metres.

(<http://asawahlquist.com/?p=341>)

My great wish is that the Foreshore Walk continue around Blackwattle Bay, along Bridge Road and Banks Street. I would like to see a continuation in the same style as

the existing walk, with native trees and plantings, with seats and sandstone rocks and even a small beach. I would like to see a serious effort at restoration, with mangroves and saltmarsh, similar to that being made in Rozelle Bay.

I think the history of Blackwattle Bay is being disregarded and literally built over. The original contours of Blackwattle Bay extended back past William Henry Drive. It consisted of a mangrove forest, saltmarsh, rocks and beaches. The area was an important source of food, of shellfish and fin fish, for the Gadigal and Wangal people. Early European settlement grew along Blackwattle Creek, which was essentially used as a sewer for industries, including tanneries, brick manufacturing, foundries and breweries, and as a sewer for housing (Glebe was unsewered until the 1890s). A bridge was built where Bridge Road now runs, and between 1876 and 1880 the Bay was slowly reclaimed, the mangrove forest filled in with rocks and detritus. One consequence of that industry and the reclamation is the toxic sediments that lie in Blackwattle Bay.

Blackwattle Bay is a blind-ending bay; the toxic chemicals from early industry, from sewage, from leachate from contaminated land, and from stormwater, all end up in the sediment in a Bay that is never flushed.

In the past, proposals ranging from marinas to restoration of Blackwattle Creek have been refused on the grounds that they would disturb the sediments, and contaminate the waters of the Bay.

Longer term efforts to clean the Harbour have resulted in the biodiversity in the Bay increasing. Eco Logical Australia (ELA) might think that the aquatic environment surrounding the site has limited biodiversity (Stage 1 E.I.S. 7.7.1 p. 132), but every sign of life is precious to those of us who love the Bay. I note that ELA conducted their field survey in mid winter, July 24-25 1917. (Stage 1 Appendix 8, 3.2 p. 13) Anyone who knows the Bay could have told them there are fewer fish there in winter. I suggest they come for a walk along the foreshore, and stop at the beaches and marvel at the number of bream swimming close to shore now it is nearly summer. They are never there in winter.

Becky Morris, in her 2016 PhD Thesis, *Retrofitting Biodiversity*, (unpublished PhD, available at the University of Sydney library) identified 26 fish species and over 50 other organisms, including oysters, shrimp, limpets, sponges and algae. The 'flower pots' that were the subject of her experiment demonstrably increased the biodiversity. Imagine what could result if the results of her research were applied along the Bridge Road shore instead.

I fear the proposed SFM would threaten this biodiversity by stirring up the toxic chemicals lying in the sediment.

The DA reports: "Heavy metal, PAH (polycyclic aromatic hydrocarbons) and TRH (total petroleum hydrocarbon) contaminated sediments have been identified within the extent of the development site that were reported to exceed both low and high trigger value sediment quality guidelines protective of ecological communities." (Stage 1 E.I.S. 7.10.3 p. 156).

The heavy metals that exceed the high trigger values include Mercury, Lead, Zinc, Copper and Nickel, while Arsenic was also found (Stage 1 Appendix 4, Figure 4B). High levels of mercury under a Fish Market sounds like a marketing disaster. The site also has "a high probability of acid sulphate soils within the benthic sediment. These soils can cause harm to marine flora and fauna if disturbed, exposed to oxygen, and then resubmerged." (Stage 1 E.I.S. 7.7.1 p. 132).

And that's what they know about. The DA states "it is recommended that further site investigation activities be undertaken prior to the commencement of any works that will result in disturbance of the sediments" (Stage 1 E.I.S. 7.10.3 p.157). It is clear that the extent of the contamination, and the threat it poses, are not fully understood.

Although there are plans to contain any contamination, any escape would threaten the biodiversity of the Bay and incur significant expense to remediate it. I think this a strong enough reason to abandon the proposed SFM and to rebuild on the current site.

I note the DA expects the number of visitors to the SFM will double to six million, in ten years time. I think the assumptions about traffic and parking are wrong. It assumes people will use more public transport. But across the Bay from the proposed SFM is the huge Westconnex site. Its aim is to bring more cars into the area. Sydney is a city for cars. The ferry is a great idea, but tiny, and the Light Rail is already at capacity in peak hours.

The proposed Metro Station at White Bay would necessitate passengers walking over Anzac Bridge, which is quite a hike, though I note one illustration has people walking over a restored Glebe Island Bridge. I wish.

The reality is most people will drive, creating bottlenecks at the Wattle Street and Wentworth Park Road intersections with Bridge Road. And with no more parking spaces in the new FM compared with the current one, and twice the number of visitors and market rate parking fees to boot, drivers will try to park on the streets of Glebe, where parking is free, if restricted to two hours in weekday work hours.

There are considerable risks to the future of SFM, which appear to be reliant on two factors: the continued supply of fresh fish, and the growth in tourism from China.

According to the SFM 2018 Annual Report

(<https://www.sydneyfishmarket.com.au/Portals/0/adam/Content/eaTuDOLO5Ee7JrTucVGbKw/ButtonLink/SFM%20Annual%20Report%202018.pdf>), the auction volume of fish in 2017/18 fell by 1,013 tonnes to 11,443 tonnes compared to the previous year. The report stated almost all the fall was attributable to NSW, which was down 21%. This fall was due to the downturn in catches in the north of the state due to the drought. NSW supplied 52.8% of product volume in 2017/18. Supplies from Queensland and New Zealand fell in the fourth quarter. (p. 26)

The continuation/recurrence of drought and climate change and increased fishing pressure in international waters, will all place pressure on fish stocks and availability to the future.

The increase in the size of the area of the SFM from 18,000 sqm to 30,000 sqm, is based on the assumption that tourism from China will increase. What if it doesn't? Why is the State Government prepared to bear what should be a commercial risk?

None of this would be a problem if the SFM were rebuilt on its current site. It is the logical solution, the least risk solution financially and the least disruptive to the community.

Yours faithfully,

Åsa Wahlquist