



INNER WEST COUNCIL

18 December 2019

Jim Betts

Secretary

Department of Planning, Industry & Environment

GPO Box 39

Sydney NSW 2001

Attn: Lauren Rose

Dear Mr Betts

Re: White Bay Cruise Terminal Modification 6 (Events & Functions)

Council is opposed to the current modification to increase the White Bay Cruise Terminal's event facility's approved capacity by 400% (from 500 to 2,500 guests) and considers that there is inadequate justification for the proposed intensification of use, particularly noting its potential impacts on the adjacent community. Consequently, Council requests the Department of Planning, Infrastructure and Environment refuse the application.

When the Cruise Passenger Terminal (CPT) was originally proposed, the nature of its event facility was clearly ancillary to the Terminal; providing a combination of uses which included beginning and end of trip functions for cruises, as well as a small number of unrelated events hosting up to 500 guests. Concern has been expressed that the long-term viability of the existing cruise passenger terminal is largely contingent on the ability of cruise liners to be able to pass under the Sydney Harbour Bridge (also noting the current proposal to establish a new terminal in Botany Bay). In the medium to longer-term; as cruise liners increase in size, the potential exists that the White Bay site will be unable to accommodate the vast majority of cruise liners.

Should the proposed modification be approved it is considered that a future modification may see the site transition to a major exhibition and event facility; based on it hosting of 2500 person event. Council considers that the site's use as a major exhibition and event facility is inappropriate and that the current modification may establish precedent for such a use in the future. Currently quieter periods between cruise liner days provide respite for adjacent residents. Any disruption to this respite (eg large events on non-ship days) is considered unacceptable as it has potential to impact on the amenity of nearby residents.

The assessment provided, with the current request for modified conditions, does not address any long term goals for the site and may initiate incremental "creep" leading to a rebalancing of site uses and ultimately replacement of the terminal use with event uses. Further, it is considered premature to progress such a significant intensification of use without reference to an overall master plan for the Bays Precinct.



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While Council is opposed to the proposed intensification of use, should the project proceed it is essential that all of the following issues be addressed:

Consideration of cumulative impact of proposals

The proposed site is immediately adjacent to White Bay and Glebe Island, both of which have significant construction and operational activity, and are being subjected to increasing amounts of construction traffic. Existing and likely future activity in the area relates to concrete batching plant operations, motorway and metro line infrastructure projects. Additionally, the site is in proximity to the WestConnex Rozelle Interchange site, currently under construction.

While the area is within the remit of the Cumulative Traffic Working Group (CTWG), Council expresses concern that each application to add (or expand) activity in the area is generally being addressed as an individual component which contributes only small elements to the big picture. This is of particular concern given the proponent's statement that the CTWG's concerns mainly related to the provision of measures to manage traffic for functions starting and finishing during road network peak periods.

While Council recognises the importance of peak period road network operations, it also expresses concern regarding the overall intensification of use, operation and construction activity throughout the day, and its likely impacts on access (and amenity) for the local community.

Consequently, it is considered essential that a detailed cumulative traffic assessment be carried out including intersection analysis which takes into account;

- area-wide cumulative construction traffic during venue reconstruction; and
- a second analysis which considers total construction activity around the site during the operation of the venue.

Such analysis should particularly consider the possibility of multiple coach arrivals and their impact on the intersections of Robert Street with Mullens Street, and Robert Street with Victoria Road (particularly noting the limited right turn storage capacity at Robert/Mullens and the recent court approval of a Bunnings Outlet at 8a Parsons Street, Rozelle).

Noise Impacts

The proposed increase in permissible noise levels (an increase of 5 dBA) in combination with extended operating hours is considered inappropriate given the site's proximity to residential areas (both Balmain and Pyrmont) and potential future residents of the Bays Precinct. Further, it is noted that an increase of 5dBA (as proposed in the modification), is cited in numerous acoustic studies as representing a perceptible increase in noise. Consequently, it is considered inappropriate to increase either the permissible noise level or the hours of operation of the facility.

Specific issues relating to noise impacts associated with the proposal are detailed below:



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- A maximum low frequency (dB(C)) noise level has not been detailed. Similar to the 92dB(A) maximum noise limit, it is recommended that the measured dB(C) maximum noise level also be controlled via a noise limiter.
- It should be required that all windows and doors servicing the terminal building are to remain closed during operation.
- From 12 midnight to 7am, the operation of the premises must be inaudible at any residential premises as per the Liquor and Gaming NSW noise criteria.
- Allowing for patrons to exit the premises between 12:00 and 12:30am via buses/chartered coaches is not supported as it would generate vehicular noise and noise from patrons waiting and boarding these vehicles. It is unlikely that this can be achieved without being audible to neighbouring residents. Part 8 of the acoustic report also confirms Council's concerns, concluding that extending the permitted hours of operation for functions "are likely to generate an audible noise to sensitive receivers".
- A further noise assessment is required to assess the potential noise impacts associated with the operation of the external amusement rides, considering the noise generated by patrons yelling, machinery, independent ride music and announcements from amusement ride staff. This activity should not form part of the approval without this assessment being carried out and considered. The acoustic report (External background noise: Part 7) does not assess noise from amusement rides and the like, it only assess external background noise.

Transport management plan amendments

While the generic event Transport Management Plans (TMPs) provided in the application indicate a desire (on behalf of the proponent) to reduce car and coach dependency, it is considered that they lack sufficient detail to accurately determine their ability to achieve the targeted mode split. It is suggested that the proponent should provide improved active and public transport links to several locations including the future Bays Precinct Metro Station, Rozelle Linear Park and Anzac Bridge/Pymont, as well as enforceable, detailed (event size based) TMPs prior to approval.

These plans should be agreed to by all stakeholders and operators prior to approval being granted for the modification. As part of the event TMPs, on-site parking for events should only be available via advance purchase as part of event ticketing; Should overflow parking occur in adjacent streets during events, any necessary management measures should be provided at the proponent's expense.

Other considerations

- Lighting impacts: Intensified use of the site (particularly in relation to increased patronage) is likely to require a change in the lighting state for the site. This, in combination with increased hours of operation, is likely to reduce local amenity for nearby residents (including Balmain and Pymont).
- Variation to hard stand areas: Any variation to hard stand areas (eg expanded car parking, roadways and set down facilities) should be accompanied by analysis of increased heat



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island impacts and surface water flow, with appropriate mitigation measures being implemented as part of the project;

- Special events: Specific consideration should be given to management of Super Peaks created by days such as New Year's Eve and Australia Day; when the facility could host major events including fireworks viewings and harbour cruises. Other semi-regular activity peaks could also include Sydney's Vivid Festival (with harbour cruises and the possibility of vivid installations in the Bays Precinct and the terminal itself);
- Proportion of events greater than 1500 guests: While the proponent states that the likelihood of an event for more than 1,500 guests would be extremely infrequent, it is considered that this may be correct under existing circumstances however as cruise liner sizes continue to increase (and the number of ship docking days at the CPT potentially decreases due to height limitation imposed by the Harbour Bridge) CPT operators may consider increasing the frequency of larger events. The possibility would also be presented (as the number of consecutive docking days reduces) for longer duration events, such as exhibitions, to be held at the CPT. This would, in turn, alter travel behaviour, including bump-in and bump-out activity, duration of stay and reduced respite for nearby residents.
- Reduction of notification time for events: There appears no clear justification for the proposal halving of the minimum notification time for events (from 14 to 7 days). This reduction is strongly opposed as it is considered counter to good communication practice;

Should you have any questions regarding this submission please contact Council's Strategic Transport Planner, Ken Welsh, on 9392 5731.

Yours sincerely,

Manod Wickramasinghe

Traffic & Transport Planning Manager