

I object to the Kamay Ferry Wharves project

I like to swim & snorkel at Frenchmans beach as it has excellent visibility for swimming & snorkelling around the rocky headland & at Bare island. Lots of kayaks, small tinnies & windsurfers can safely use the area as no commercial vessels currently operate here. My response refers only to the wharf & impacts at La Perouse.

I believe the EIS fails to meet **General & Key Issue Desired Performance Outcome Requirements** under SEARs in multiple instances as detailed below. Text in bold shows SEARs that appear to have been met in a superficial or tokenistic way & **not** met in a meaningful way. Text in italics shows General (G) or Key Issue (K) & the related SEARs paragraph number which it applies.

Massive project size overdevelopment & inappropriate

The primary purpose is *'Reinstating'* the ferry service between La Perouse & Kurnell & *'Improving Visitor Numbers & Access'* to Kamay NP. The proposed wharf at La Perouse is over 7 times the size of previous wharf. It goes 180m out into the bay, has a huge 40mx10m wharf head at the end & will be 4m off the water. It is not clear why it needs to be built to this scale & why it would need ferries up to 40m long taking 522 people. The community has not had **G2.0 Sufficient Detail** for a **G2.0 Clear Understanding** of reasons for its size. Reasons provided are not elaborated on & do not support stated purpose. It is massively larger than wharves at Bundeena & Pittwater which provide a similar service to the one proposed.

The proposed wharf at La Perouse is not **K4.2(e) Fit for Purpose** as it is a huge overdevelopment for *'Reinstating'* previous ferry service; it does not **K4.2(a) Fit Contextually** as the immense structure dominates beach, bay & peninsular at La Perouse. Its urban design of concrete & steel is at odds with the natural environment, the historic buildings & **K7.0 Heritage Significance** of La Perouse headland; it does not **K4.2(f) Create & Add Value** to La Perouse, instead it will negatively impact and overcommercialise La Perouse; it does not **K4.0 Enhance the Environment** in terms of **K4.3(a) Public Space** or **K4.3(c) Views & Vistas** including those involving **K7.2(c) Heritage Significance landscapes & vistas**, instead it significantly detracts from the beach aspect & the historic & natural environment of La Perouse headland & does significant harm to views & vistas. Part of the charm of La Perouse is its open unobscured views over the bay. It is not therefore **K4.0 Well Designed**.

There is little attempt to provide a design to **G2.1(j) Minimise or Avoid Impacts** or to provide **G2.0 Least Adverse Environmental Impacts**. There was no analysis of **G2.1(e) Feasible Alternatives** such as a shorter wharf or **G2.1(h) Different Construction Methods** such as a more traditional wooden structure. The two designs presented were virtually the same. The **K4.5 Provision of Visual representations from Key Locations** was very limited & the representations that were presented were misleading. Photos were taken to misrepresent impact were taken when Council building works were taking place to suggest an extremely unattractive beach & were taken from extreme viewing angles to deemphasize size & unrealistically suggest minimal impact to Frenchmans beach aspect. There should have been multiple visual representations from different spots on the beach with those spots marked clearly on a map. There should have also been photos of Frenchmans beach during the summer months when the beach is packed (eg Feb 2nd when traffic study done) to truly represent usage & loss.

In the **G4.0 Consultation process** document feedback records that important aesthetics to the community were that a wharf should be *'small'*; *'sympathetic to the area'*; *'not modern'* & *'reflect Heritage of the area'*. The design did not appear in any way to be **G4.1 Informed by Consultation** or to be **G2.0 Iterative process** suggesting the Consultation process is neither **G4.0 Meaningful** nor **G4.0 Effective**.

Commercial wharf – Usage & Impacts not included in EIS

The implications & impacts of commercial wharf usage should be extensively analysed so the proposal meets SEARs as this aspect will have the largest & most significant future impact on La Perouse & directly results from the project. The commercial wharf is included under 'Purpose' & 'Objectives' & mentioned but not clearly **G3.2(c) Identified or Described** & future **K7.0 Operational Impacts** are not **G3.2(c) Identified or Quantified**. Mention of commercial usage has been avoided throughout the EIS to a level that it appears it is being deliberately hidden. This goes against SEARs to present all **G3.0 Key Issue Impacts** to ensure issues are **G3.0 Assessed Objectively** & to **G2.0 Provide Sufficient Detail** for **G2.0 Clear Understanding** of the Impacts **3.2(c) including Cumulative Impacts**. It is not **G1.0 Transparent** & **G1.0 Balanced**. Questions were avoided in **G4.0 Consultation** which doesn't meet **G2.0 Iterative Process** requirements.

In 2016 Transport NSW informed the media that the proposed wharves may become part of a wider commercial ferry network to include Hayes Dock in Port Botany which is the nominated interim solution for cruise ships to berth before a permanent solution is reached. When repeatedly asked at consultation about this possible future **cumulative impact** of commercialisation we were told that Hayes Dock may be where the ferries are serviced or kept at night. NSW Ports has denied both. In the EIS it said *'the project is independent of, & separate to, any other infrastructure or development proposals for Botany Bay or wider locality including the cruise terminal proposal'*. We knew this, but what we wanted confirmed or denied was whether it could later be used for this purpose. This does not appear to be a **G1.0 Transparent** response or **G3.0 Provide confidence** to the public that the project is considering Key Issues impacts **K10.2(a) By the operation** or future **G3.2(c) Cumulative impacts** to ensure that it will be **G3.0 Operated within acceptable levels of impact**.

It was repeatedly asked if the wharf would be used for Cruise ship tenders, this question was avoided with a pretence of misunderstanding *'The location & design of the wharves would not be able to accommodate cruise ships'*. This was not **G4.0 Meaningful & effective engagement** it was a disrespectful response dodging the question.

Effects on community including visitors & residents not appropriately considered.

The project design does not **K8.0 minimise adverse social impacts**. Impacts are substantial on all recreational usage. The project does not **K8.0 achieve appropriate integration with adjoining land uses** as it will dominate the beach & headland. It does not consider the **K8.3 & K8.5 potential disruption & restrictions on the recreational uses & users**. Thousands of Sydneysiders use Frenchmans beach every day in summer & they will be hugely negatively impacted. Instead of looking from the beach across the bay or at the headland they will now look at a massive urban wharf which will semi enclose the beach. Noise from vessels & PA systems, sediment disturbance, & possible rubbish/oil spillage pollution will make it like swimming in a closed harbour environment than swimming in a delightful open bay. Issues are superficially addressed.

Table5 AppendixD shows the consultation process is flawed & hasn't reached the largest of all community/stakeholder groups as 'beach users' are not represented as **recreational user respondents**. It would have been easy to at least inform beach users if noticeboards had been erected at the 3 access points to Frenchmans beach. Again this does not meet with requirements **G4.1 for the project to be informed by consultation with special interest groups & the community**.

There will be substantial rather than minimal **K8.0 displacement of existing water based activities** for beach users. There seems to have been little consideration given to **K8.2(a) how potential environmental changes in the locality may affect the community** or to recognize **K8.2(e) how different groups may be disproportionately affected** ie stakeholders like the kitesurfing/foilboarding as it will be impossible to get safely back to the launch beach in certain wind conditions. There is no acknowledgment of the impact or on-going safety of small watercraft, kayakers, windsurfers etc operating amidst large commercial boats. Kiteboarding, & kayaking communities do not appear to have been contacted or made aware of this project even though they are easily accessed via facebook sites/their associations.

Traffic & Parking impacts

K10.2.0 Efficiency of the transport system (inc parking) managed to minimise impacts. Parking & traffic concerns are being insufficiently addressed/managed. Feasability study said 86 new parking bays needed at La but EIS says only 13 which seems inadequate & no explanation has been provided why this has dropped. **K10.2 land-based & maritime-based assessments .. of traffic impacts, inc a)traffic generated by the operation of the project b)volume & type of vessels inc commercial expected to use infrastructure on weekdays, weekends & public holidays c)hours of operation d)car parking** Studies for traffic & parking at La Perouse were conducted on Sunday 2nd February, one of the busiest days of the year, a hot Sunday in summer. Inevitably, traffic & parking was at its peak usage resulting in parking & traffic issues being observed. The study then absolves the proponent of responsibility claiming legacy parking & traffic issues which the project would not resolve or add to. Clearly any additional need would create extra pressure on the system during these times & at other times so it is irresponsible & dishonest to avoid responsibility for traffic or parking issues & provide just 13 new bays. There is an admission that traffic may be frustrating for users but responsibility for any additional traffic is absolved by implying there will be no additional traffic and people will merely perceive residual impacts during operation of the project.