GLEBE ROWING CLUB INC.

Established 1879

ABN: 25 645 535 237

13 November 2019

Your reference: **SSD-8924**

Department of Planning, Industry and Environment
GPO Box 39,
SYDNEY, NSW 2001

Attn: Director – Key Sites Assessment

Concept development application for the New Fish Market & Stage 1

Dear Sir/Madam,

We represent Glebe Rowing Club, an amateur, volunteer based rowing club that has operated on the water of Blackwattle Bay since 1879. The Bay is our home and we rely on safe water conditions for our 150 members to continue to use the water.

We support the overall Fish Markets development as a positive for the local community and Sydney residents and visitors. It is an amazing opportunity to open up the land around Blackwattle Bay for use by the community.

We object to some important aspects of the proposed development and request:

- improved analysis of the impact on water traffic be undertaken and factored into the design and Master Plan;
- modifications be made to the design of the Eastern Wharf to ensure the safety of rowers; and
- the implementation of necessary safety provisions during the early works project into the construction contract to ensure the safety of water users during the long construction phase.

The consultation process The Fish Markets and Infrastructure NSW have conducted with us, has to date, been accommodating, and resulted in amendments to the Western fishing trawler wharf and ensured a better wharf design for everyone. We trust the same outcome can be achieved for minor changes to the East Wharf design.

We note the development of the Bay Master Plan during 2020 will involve further consultation and involvement from the recreational water users, and we are keen to ensure that there is no unintended cumulative impact of the safety of recreational water users. It is vital that the Master Plan includes a more detailed assessment of existing recreational water traffic, and proposed water traffic in order to fully address safety considerations.

About Glebe Rowing Club

Active members	Over 150
Community participation programs	Our novice and beginner programs introduce over 60 school age children (including those from Sydney Secondary College) and 50 new adult rowers to the sport every year.
Member diversity	● active members range from 14 to 75 y.o ● novice to elite level rowers ● an active LGBTI membership ● a growing number of Para rowers
Use of the Bay	Week days, year round (members) ● 5:15am to 8:00am (avge. 8 boats at one time) ● 4:00pm to 6:00pm (avge. 4 boats at one time) Weekends, year round (members) ● 6:30am to 10:30am (avge. 15 boats at one time) Weekends, 16 weeks a year (Learn-to-Row program) ● 8:00am - 11:00am (avge. 6 boats at one time) JB Sharp regatta in July every year (over 100 rowers using an 8 lane course).
Bay recreational community	GRC is part of the broader passive recreational craft clubs of the Bay which numbers over 1,000 regular rowers canoeists and Dragon Boaters.

Reasons why we object

Safe rowing lanes and adequate planning for the volume of water traffic, and in particular the placement of wharves or vessel docking, is vital to the continuation of recreational craft use of the Bay.

It is our view that the DA plans fail to factor in the needs for recreational water users on the Bay. While a navigational impact assessment plan is submitted it is inadequate in a number of ways. As a result, the information used to assess the impact on safety of the East wharf on recreational water development is flawed.

1. **The current assessment of water traffic within the NIA is inadequate because it fails to accurately reflect the current and predicted water traffic volume. This inadequacy leads to an inadequate analysis of potential collision risks.**

The proposals do not assess existing or future volume of powered and unpowered 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 (objection 2 below) could be ameliorated.

The submitted Environmental Impact Statement (specifically page 18), and the Marine Navigation Assessment (page 20), both fail to grasp the full extent of recreational use of the Bay. These documents were developed without consultation with recreational boat users but form the basis of assumptions as to water access and safety in relation to the development that are incorrect. Examples of critical missing or incorrect information include:

- *Reference to the rowing course as 'voluntary' (page 19).* In fact, the current navigation plan for the rowing course was agreed to in consultation with Roads and Maritime Services and Rowing NSW. The rowing course and training maps are compiled by NSW Government Transport Road and Maritime Services department, in consultation with key stakeholders including Sydney Ferries, Captain Cook Cruises, local Rowing Clubs, Rowing NSW, Paddle NSW and Dragon Boats NSW.
- *Lack of data on the frequency of use of the rowing course.* No visits or meetings were held with recreational boat users and data was collected from our web-site without checking with the club. The NIA refers to use of the course as 'most weekday mornings and weekends'. Page 19 of the NIA refers to a Saturday site visit, however although a schedule of surveys does not seem to have been provided to quantify the recreational use.
- *Lack of justification for the number of pleasure craft docking berths, size and positioning of the East wharf.* The EIS cites 'day trippers' to the fish market would arrive by boat. Currently, small powered vessels only occasionally arrive for a few minutes to pick up food orders before departing. Whilst it is acknowledged that this is projected to increase with the redevelopment, the submission lacks data on projected numbers that would justify the number of pleasure craft docking berths planned. Similarly, the Eastern wharf includes ferry docking, however, there seems to be no analysis undertaken to indicate the extent of any ferry services.

Recreational use of Blackwattle Bay should be strategically accounted for in the master plan for the area. This would address the cumulative impacts on water safety for non powered vessels posed by the Fish Market and other developments:

- the location of the current fast ferry fleet based on the current timber wharf to be demolished as part of the development;
- The impact of the Banks Street marina development to the rowing course;and
- Glebe Island Bridge, and the impact its potential removal might have to the maintenance of the no splash zone within the Bay.

2. **The length of the public wharf on the eastern side needs to be shortened by 32m to ensure it does not create an unsafe turning circle for recreational water traffic.**

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 65 metres into Blackwattle Bay and it is proposed that the current agreed rowing course be shortened by 45 metres to accomodate 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.

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. By the NIP's own account, this is an unsafe distance from the Eastern Wharf.

We request that the wharf be shortened by at least 32m to restore the safe distance from the actual turning circle of boats and the wharf.

Incorrect assessment of the safety of the Eastern Wharf

The current analysis of the safety of the planned Eastern Wharf does not reflect: a) correct rowing route and lanes; b) the turning circle of rowing boats at the head of the Bay; orc) the turning circle of the proposed ferry at the end of the pontoon.

To accomodate for the Eastern Wharf's encroachment onto the Bay, the EIS, and the supporting Navigational Impact Plan propose a solution to modify the rowing route by 45 metres to maintain a safe distance between turning boats and vessels docking at the wharf.

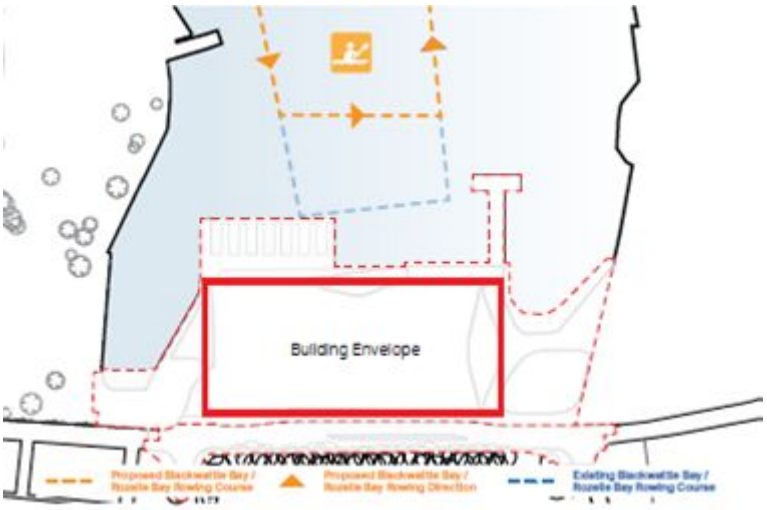
> "to provide a minimum distance of 45m to the proposed wharf structures as per the current offsets applied in the existing rowing route from the Blackwattle Bay Marina and Sydney Fish Market main concrete jetty. This would improve waterway safety by reducing interaction between powered and non-powered craft in the vicinity of the proposed wharves and relocate the end of the rowing route to a convenient position opposite the Glebe Rowing Club pontoon. It is not considered that this rowing route modification would have any adverse impact on the safety of non-powered craft as the existing available waterway width across Blackwattle Bay would be maintained and only the length of the Blackwattle Bay leg of the rowing route would be reduced by 45-50 metres."

In fact, with the Eastern wharf situated as per the design, to maintain a safe distance would require a 70 metre reduction in the rowing course that would be inconvenient and unsafe. This because the NIP:

- incorrectly identifies the correct rowing course length and direction (see Diagrams A and B); and
- fails to factor in the turning circle considerations of rowing and ferry vessels.

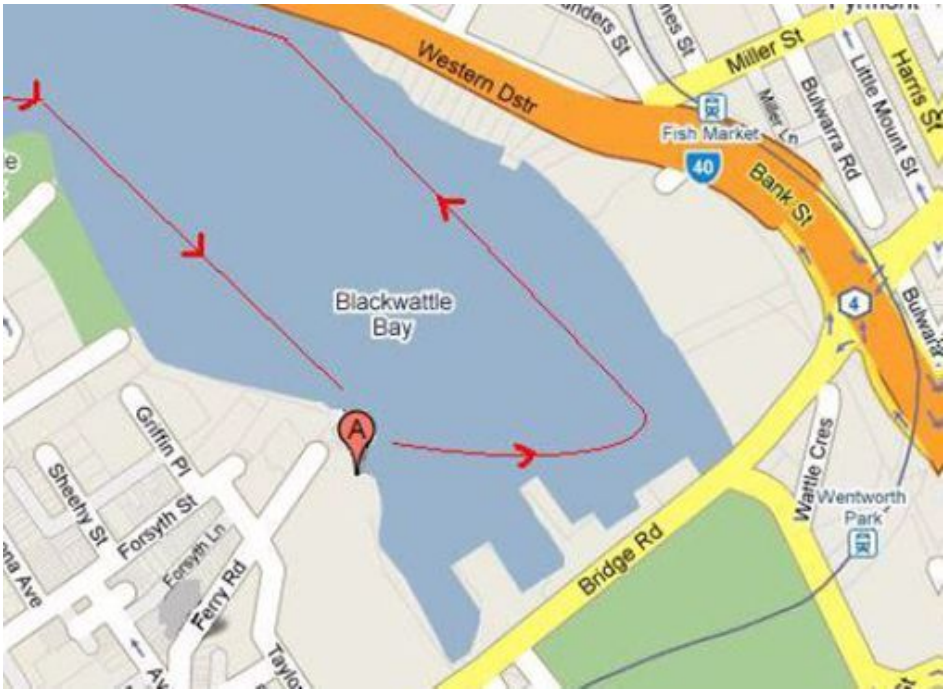
This inaccuracy is particularly problematic when it is continually referred to in demolition and construction maps (Appendix 16).

Diagram A: Incorrect diagram of the rowing course as drawn in the EIS



Reference: Navigational Impact Plan, page 129

Diagram B: Correct diagram of rowing course (quoted but not referred to in the Navigational Impact Assessment)



Glebe Rowing Club Handbook Rowing Map (referenced by Royal Haskoning report in the Navigational Impact Plan on page 20)

Safety issues with the new proposed rowing course

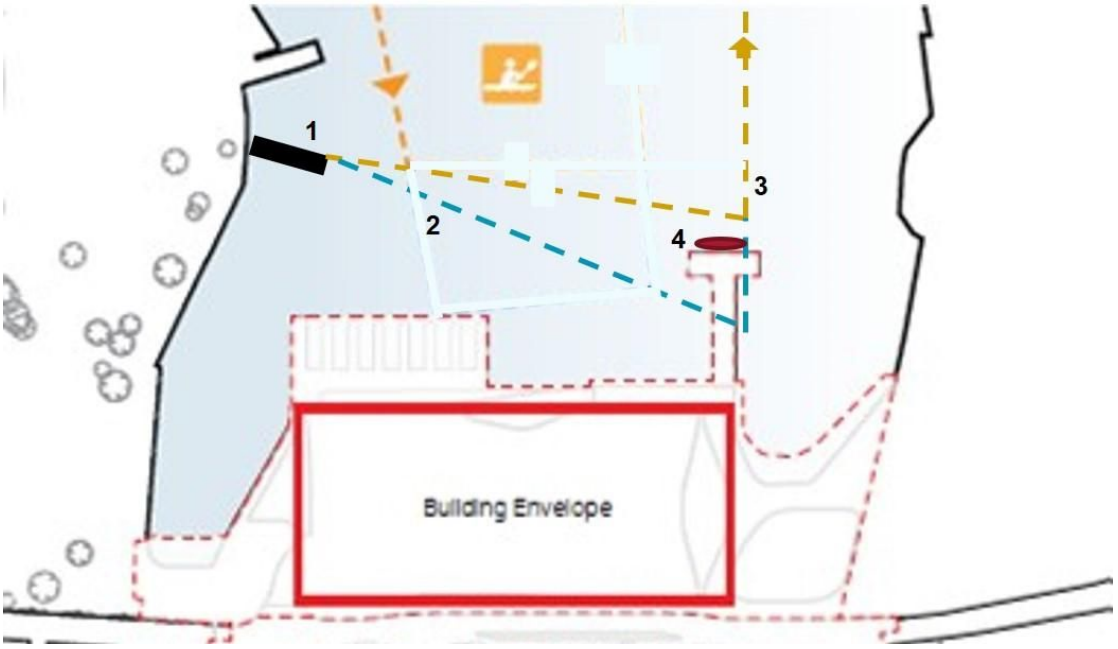
The proposed rowing course identified in the NIP is unsafe as it would put rowing boats on course for collision with on-coming traffic as it places:

- rowing boats travelling on the Eastern side, essentially down the middle of the Bay, typically in the same lane as an increased number of motorised craft that typically travel down the middle of the Bay; and
- would have rowing boats leaving the pontoon at right angles to rowing craft coming down the West side of the Bay.

To demonstrate the safety concerns, the Diagram C 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)

Diagram C: Changes to the rowing course (noting 1- rowing wharf, 2 - correct current rowing course, 3 - likely mustering point and 4 - ferry)



To maintain the safety considerations accounted for within the design of the current rowing course, the length of the proposed East Side wharf needs to be reduced by approximately 32 metres. This is required to maintain a safe distance from turning rowing boats from the ferry wharf.

3. **Safety considerations during the construction phase: The DA and Navigational Impact Plan provide assumptions as to the construction process that mitigate safety risks for water users during the demolition and construction works. These assumptions need to be implemented into the Contractor work method plan.**

It is expected that the construction phase of the project will likely create a 4 year disruption to use of the water by recreational vessels.

The Navigational Impact Plan outlines the need for detailed consultation between relevant parties to determine the required work area and work method plan that will also form the basis of the Marine Noticesused to maintain on water safety. The Navigational Impact Plan lists the following parties as those that need to be part of the consultation process: "Infrastructure NSW, Roads and Maritime Services, Port Authority of NSW, Harbour Master and other appropriate Authorities." We call for a body representing recreational boat users in the Bay to be included as one of these other "appropriate Authorities."

We note in the DA the Navigational Impact Plan makes a number of assumptions as to the construction process that they deem important to its claim that the risk mitigation steps they highlight will be sufficient to ensure that the construction process does not create unacceptable safety risks for marine craft.

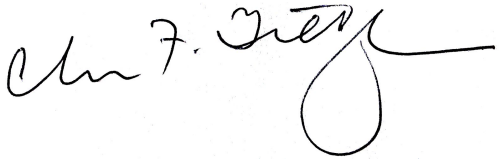
We ask that the following assumptions outlined in the DA be implemented into the Contractors detailed work method plant:

- It is not proposed that barges would transport any demolition material off the site via Sydney Harbour;
- Demolition materials would be transferred onshore;
- Mobilisation and demobilisation of floating plant to the site would...be a 'one-off' activity completed at the start and end of the works; and
- An appropriate program of consultation and information should be developed to ensure that stakeholders (e.g. rowing clubs, dragon boating clubs, marina facilities, marine contractors) and the general public are fully notified of proposed construction activities and associated exclusion zones.

(page 37 - 38 Navigational Impact Plan)

This will be the only way to ensure the project is able to deliver on the intention to continue to enable safe recreational craft use of the Bay during the construction period.

With kind regards,



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