

26 July 2017

The Hon. Anthony Roberts MP
Minister for Planning
GPO Box 5341
Sydney NSW 2001

Dear Minister

MP 11_0001, Maritime facility (former Sydney Heritage Fleet) - Modification 3

I write to object to the proposed modification to the approved Sydney Heritage Fleet (SHF) facility at Bank Street Pyrmont and ask that the government honour its promise to transform the site into a public waterfront destination for passive recreation.

The Bank Street site is prime waterfront land and provides rare open space opportunities. It is part of the Bays Precinct which has been the subject of successive studies and reports including the Bays Precinct Taskforce, the Bays Precinct Strategic Framework, the Community Reference Group, the Bays Precinct Implementation Committee, the 2006 Bank Street Master Plan and the 2015 The Bays Precinct Sydney Transformation Plan. These produced a strong consensus that the site is a special place that should be transformed for public benefit with public open space and recreation opportunities. Detailed plans would be determined with genuine public and stakeholder input. The Roads and Maritime Services in 2013 promised to transfer the site to the City of Sydney for a park and Urban Growth has long promised that it would be a public recreation destination.

Pyrmont is one of the most densely populated areas in Australia and development at the Bays Precinct and on the existing Sydney Fish Market site will see populations further skyrocket. At the same time redevelopment of the Ultimo Public School will result in a net loss of open space in the region. These factors are contributing to rapid growth in demand for green open space. The Bank Street site must become public open space and unlike the approved SHF plans, the proposed modification would exclude any useful open space and would alienate prime waterfront land for private gain. It is ad hoc planning at its worst and should be refused.

The proposed marina would be unsightly and erode amenity, excluding it from ever becoming an inviting destination; this can only be considered a betrayal of past stakeholder and community engagement and successive government promises. The token timber foreshore walkway proposed for so-called "harbour access" will be unattractive. This is a less than average proposal on a site that should be part of Sydney's pride and splendour.

Application Process

It is of great concern that the proposal is being submitted as a modification when it represents a drastic change in purpose to the existing approval. The proposal would result in significantly more impacts yet the assessment of these has been inferior.



The number of vessels moored will increase from 12 to 22. The types of vessels will look different changing from heritage fleet to party and charter boats and the frequency of movements and hours of operation would increase substantially. Unlike the approved facility, which would have provided a public museum, community space and heritage ship restoration workshop, the proposed facility would provide a demountable building, stacked shipping containers up to the harbour edge, bins, tanks, gas bottles and a sewage pump out facility, plus some minor office activities.

The SHF plans followed community consultation including to ensure activities would not impact on onsite passive boating activities. The applicant of this proposal has not consulted with the community.

It is worth pointing out that the approval for SHF clearly states that “only the vessels of the Sydney Heritage Fleet or any other affiliated maritime heritage organisations may operate at and use the marina and its berths. Private vessels/boats must not be moored at the maritime facility at any time”.

The application should be subject to a new environmental impact application.

Proposed Public Open Space

The site’s role in contributing to Sydney’s passive recreation needs has been long recognised by the local community, governments and agencies. It is outrageous that despite rapid increased demand for open space, that this site could be locked up from public access as a boat storage facility.

The open space included in the application is small, paved and away from the waterfront and the timber walkway will have little appeal being adjacent to shipping containers, rubbish storage and an ugly and unpleasant sewage pump out facility. The existing Blackwattle Bay Marina is a mess and would make the Bank Street site an eyesore.

The proposed marina relocation will alienate this prime harbour location from any public purpose.

Water Activity Assessment

It is unacceptable to separate the impact assessment of moored vessels from the facility: they are part and parcel of each other and their impacts occur in unison. This disconnected process prevents proper assessment and the community understanding of the extent of likely impacts.

Modification 2 was approved on 15 March this year and Urban Growth’s application for this proposal, which was submitted only five days later, refers to a letter to the Department of Planning and Infrastructure dated 2 December 2016 advising of this proposal. It appears that the department knew when it assessed Modification 2 that the approved plan was earmarked to change as now proposed. It is very curious, if not suspicious that the department proceeded to approve separation of the wet land works from the dry land works. It reeks of decisions behind closed doors with some arguing that the purpose of Modification 2 was to improve the approval chances of Modification 3 by hiding the full extent of impacts.

Passive Boating

The Bank Street site has supported passive boating activities for over a century and the expected impacts on these activities are not clear; the development application merely provides a brief statement that there will be ‘no impacts’ possibly because the application does not include water activities associated with the facility.

I understand Dragon Boats NSW comments were incorporated in the final plans for the SHF facility. The SHF environment impact assessment stated that impacts would be minimal because dragon

boating activities generally occur outside the hours of operation of the SHF, which are standard business hours. The proposed marina would operate outside of business hours – seven days a week between 7am and 1am – and this would coincide with passive boating activities. I am concerned that the increased number of vessels moored at the harbour and the increased vessel movements will impact on the safety of passive boaters and their access to the waters.

There is no indication that the applicant has worked through any problems with passive boaters.

Public Water Views

The site is zoned passive recreation and part of its appeal is its access to and views of the water. Water views from this public harbour site must be protected and enhanced. The application does not show the visual impacts expected from the increase in the number of vessels in comparison to the approved SHF plans.

Without a visual assessment showing how public harbour views will change as a result of the increase in moored vessels, the community cannot understand the impacts of the proposed facility. At between 15 metres and 48 metres long, boats will be very large and capable of blocking large chunks of water.

The harbour risks looking cluttered with water views from Bank Street and harbour viewpoints from Rozelle diminished. This is unacceptable.

Vessel Activity

The application does not include any limits on vessel movements within the 7am to 1am hours of operation and no detail is provided on what movements are expected other than a short statement that “the number of movements is... anticipated to be greater” than the approved SHF, which is described as having a more “passive” use of the site, and that vessel movements would be “regular and frequent... unlike the approved SHF museum use”.

I am very concerned about expected noise and pollution impacts, and interference and safety risks with passive boating activities from frequent large vessel movements and there is inadequate information to determine impacts.

Vessel movements must be limited to protect the local community, passive boating activities, and foreshore amenity.

Marina Operations

The environmental impact statement clearly states that there will be “no embarkation or disembarkation” at the site by the general public or patrons, however the Plan of Management at Section 18.5 states that “signage will be permitted on the wharves and at the promenade level of the gangways to assist the public and patrons in embarking and disembarking from the vessels”.

This discrepancy further diminishes community confidence in the environmental impact assessment process: either the application has been ‘cut and paste’ from another or there are secret plans to expand the marina in the future to pick up and drop off patrons.

The department must investigate this matter.

Activity on the Blackwattle Bay Marina will focus on loading and unloading charter vessels. Empty bottles thrown into the large waste bins in the early morning and late at night will create significant noise impacts that will echo under the bridge and impact on a large number of surrounding residents. The existing Blackwattle Bay Marina is not located close to residential homes and its operations are not appropriately relocated within densely populated Pyrmont.

Sewage Pump-Out Facility

The SHF approved plans did not include sewage pump out activities. Concerns about the impact sewage pumping will have on the harbour and waterfront environment at Bank Street have not been adequately investigated and require further assessment.

The sewage pump-out facility will operate throughout the day and make the site unpleasant. The facility will look ugly and the potential for odours and noise to dominate the area will make the proposed parcel of open space and timber foreshore pathway unattractive. This is not an appropriate activity for a site on prime waterfront land dedicated for public recreation.

Traffic and Parking

There is widespread concern from the adjacent community about traffic and parking impacts. While the environmental impact statement asserts that the facility will generate few traffic movements and that staffers using the facility will be encouraged to walk, cycle or use public transport, local residents have inspected the existing Blackwattle Bay Marina facility and report more than 30 vehicles parked on regular occasions. They point out that staff will be arriving and leaving when public transport services are infrequent or not operating and when some people will consider it not safe to walk. They are concerned that staff will seek parking spaces on local streets, causing traffic and parking congestion.

Long Term Plans

Ten years is too long to alienate this important waterfront land from community recreational use and there is a widely held community view that at the end of the 10-year period, there will be a push to make the marina permanent, and I share their concern that this facility may not be temporary.

I am appalled that this proposal has been permitted to proceed this far when it completely disregards the government's vision for the site, developed over many years together with the local community and stakeholders.

The community engaged in discussions and sessions in good faith only to receive notification of this development out of the blue. I have received large amounts of correspondence from local residents who are outraged and now have no faith in the Bays Precinct process. This is a poor proposal for a beautiful site that has long been planned for public open space.

I urge you to ensure this ludicrous proposal does not go ahead.

Yours sincerely



Alex Greenwich
Member for Sydney