



PO Box M59 | Missenden Rd | Camperdown NSW 2050  
www.bikesydney.org | ABN 95939852367  
Tel +61 2 8213 2437

**BIKESydney's** submission to the Environmental Assessment of the

## **WHITE BAY CRUISE PASSENGER TERMINAL**

Application reference number: MP 10\_0069  
Attention: Rebecca Newman  
Submission by email: [rebecca.newman@planning.nsw.gov.au](mailto:rebecca.newman@planning.nsw.gov.au)

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### **1. Introduction**

This is a submission to the White Bay Cruise Passenger Terminal Environmental Assessment by BIKESydney.

### **2. Who we Are**

BIKESydney is an incorporated not-for-profit community organisation that advocates on behalf of people who ride bicycles living and working in the City of Sydney local government area. We are affiliated with Bicycle NSW.

We seek to develop a city:

- in which riding a bicycle is part of everyday life;
- that is vibrant, healthy, productive, creative and robust;
- that values community, mobility, health, wellbeing, social equity and sustainability, and
- where people of all ages can make easy choices to ride a bicycle, walk and take public transport.

### 3. Project Background

In December 2008 the NSW Government decided to permanently relocate the Darling Harbour No. 8 Cruise Passenger Terminal to facilitate and enhance the Barangaroo redevelopment project. In November 2009, its Passenger Cruise Terminal Steering Committee concluded that the preferred option was to construct a new purpose-built Cruise Passenger Terminal facility at White Bay Wharves 4 and 5.

### 4. Project Overview

The features of the proposed White Bay Cruise Passenger Terminal (hereafter referred to as "The Proposal") relevant to this submission include:

- use of wharves 4 and 5, and parts of wharves 3 and 6, as a permanent terminal for the berthing of cruise ships 24 hours per day, 7 days per week;
- a temporary terminal, to be erected as required, for days which require the berthing of more than one ship at White Bay;
- provision to use Wharf 5 as a function/event facility when not required for the berthing of ships;
- parking for up to 200 cars, 19 coaches, 8 minibuses and 30 taxis - but none for bicycles;
- construction of a new terminal and ancillary buildings, and
- construction of a new access road linking to James Craig Road

### 5. Statement of Position

BIKESydney opposes the *principle* of siting a Cruise Passenger Terminal at the White Bay wharves because:

- of the absence of a Masterplan for the Bays Precinct. Masterplan first; specific projects second;
- the scale of the infrastructure is inappropriate for the surrounding residential area;
- by virtue of displacing international passengers from their preferred destination (CBD), it will generate easily-avoidable impacts (eg, traffic, noise, loss of amenity);
- there are clearly more appropriate sites for a passenger terminal. White Bay is not even the preferred location for passenger terminal for the cruise industry itself;
- (as stated in the EA) "...growth in the number of cruise ships visiting ...White Bay is likely to be restricted in the long term by the height limitation of the Sydney Harbour Bridge".

Further, BIKESydney opposes the proposed scheme specifically because:

- its Environmental Assessment fails to address key elements of the Director General's Requirements;
- it is proposed in the absence of genuine analysis of possible alternatives (which is common practice for Environmental Assessments of large infrastructure projects);
- it fails to provide cycle paths and facilities as are required by current State Government initiatives;
- it fails to provide meaningful public access to the foreshore;
- it fails to provide much needed green space in the area.

The basis for each of these objections is presented below. BIKESydney has offered recommendations for cases where the Proposal's Environmental Assessment might be improved to address these deficiencies. Such recommendations do not represent support for the Proposal. A summary of the recommendations is presented in the Conclusion (Section 9) to this submission.

## **6. Shortcomings of the Environmental Assessment (EA) Process**

### **6.1 Lack of a Masterplan covering White Bay and Surrounds**

This project has been proposed in the absence of a Masterplan for the Bays Precinct (not just the Glebe Island and White Bay areas). An infrastructure project of the scale and importance of the proposed White Bay Cruise Passenger Terminal must necessarily consider how it interfaces with, and serves the needs and goals of nearby transport and land use developments. Development of plans for a Cruise Passenger Terminal at White Bay in isolation of broader land use and transport considerations risks ineffective or uncoordinated outcomes. Indeed, this submission identifies several oversights that would likely have been avoided had the Proposal been guided by a Masterplan.

#### **Recommendation:**

**6.1.1. The Director-General should defer consideration of this Proposal until AFTER a Bays Precinct Masterplan has been completed.**

### **6.2 Lack of Community Consultation**

BIKESydney contends that planning major public infrastructure projects such as the proposed White Bay Cruise Passenger Terminal under the discretionary Part 3A process is highly undesirable given the very restricted opportunity for public involvement. Restricting the public's involvement to the EA stage does much to render its input an after-thought. A proper engagement with the public would invite community input at the design ("project application") stage.

BIKESydney is a stakeholder of the White Bay Precinct which is situated on a major cycling and pedestrian corridor to the Sydney CBD. Indeed, this precinct is in easy walking and cycling distance from the CBD. Neither BIKESydney nor, as far as we are aware, any other cycling group, were consulted as part of the EA process.

Consultation with public authorities (EA, p31-33) resulted in both Transport NSW and Leichhardt Council expressing the need for cycling access to the site. The EA ignores this request.

Chapter 4.1 of the EA has the temerity to indicate that the Government values public consultation (for the Bays Precinct) and to indicate that none of that as-yet incomplete public consultation will have effect on this Proposal. Even leaving aside the facts that it is unspecific, open-ended, and irrelevant, the inclusion of Chapter 4.1 of the EA is insulting in that it infers that the public has been consulted on this Proposal.

## **Recommendations:**

**6.2.1. That should the Director-General deem the Proposal suitable to proceed, he require the proponent to provide a publicly-available Preferred Project Report which addresses the recommendations of this submission.**

**6.2.2. That the Director-General require the Proponent to consult with local cycling advocacy groups such as BIKESydney, Leichhardt Bicycle Users Group (LBUG) and Bicycle NSW.**

### **6.3 Lack of Discussion of Alternative Concepts**

The merit of any project can only be determined through a thorough assessment of robustly-developed alternatives. The EA fails to present an analysis of alternative options to the Cruise Passenger Terminal at White Bay. Similarly, there is only minimal discussion as to how White Bay was chosen as the preferred site for the Cruise Passenger Terminal. The EA has been framed without a sufficiently rigorous assessment of options or alternatives, and therefore that the project constitutes the best outcome for serving the community or the passenger cruise market.

## **7. Shortcomings of the Proposed Scheme ("The Proposal")**

BIKESydney's advocacy most fundamentally focuses on improving conditions for cycling. However, in such advocacy BIKESydney also has a focus on improving the city's "quality of living" which we see as a highly-connected cause.

This section briefly outlines BIKESydney's objection to the Proposal on the grounds of it compromising the "liveability" of the city. A critique of the Proposal based specifically on matters directly affecting cycling are presented later.

### **7.1 Limited Future Shipping Demand for White Bay**

The EA itself recognises (EA, p vi) that in light of the trend of the size of new ships increasing, "...the growth in numbers of cruise ships visiting the proposed [Cruise Passenger Terminal] at White Bay is likely to be restricted in the long term by the height limitation of the Sydney Harbour Bridge."

This flies directly in the face of the justification for the Proposal which is stated (EA, p3) being to "...ensure transport growth in the [Cruise Passenger Ship] industry...".

It rather appears that the Proposal is hamstrung on properly delivering on its goal.

### **7.2 Wrong Location. Inappropriate Scale**

Overseas passengers will arrive to Sydney with the intention to visit the city's CBD, not Balmain. The terminal is best placed at east Darling Harbour (Barangaroo) where disembarking passengers will have a 15 minute walk to their attractions in the Rocks and CBD areas, and significantly better access to Sydney's public transport systems. Siting the

terminal at White Bay will introduce significant and easily-avoidable environmental loads on the community relating to traffic, noise and loss of public amenity in particular. The trial arrival of a cruise ship at White Bay in early 2009 was widely condemned as a failure - particularly in relation to length of time required for disembarking passengers to arrive from the White Bay terminal to the City by bus (more than an hour). (Barangaroo to the Rocks is less than a 15 minute walk.)

The scale of the infrastructure is inappropriate for Balmain, a residential area. Clearly, its scale would be better accommodated by the commercial cityscape at east Darling Harbour.

### **7.3 Transport Impacts will Diminish Cycling Provision Rather than Improve it**

The impacts of the transport design of the Proposal will in many cases diminish the existing provision for cycling rather than improve it. It is necessarily the responsibility of large-scale infrastructure projects to achieve the latter.

Robert St (south-west of Buchanan St) forms part of the Leichhardt Council bicycle network. Even leaving aside the obligation of the Proposal to result in *improving* conditions, the combined effect of the proposed narrowing of Robert St (EA, p42, p61) and the additional traffic introduced onto Robert St by the Proposal would diminish the existing cycling provision.

Figure 4 of the EA (EA, p11) clearly indicates that the Project will not only intersect with, but sever the desire line of a future cycling and pedestrian connection to the Glebe Island Swing Bridge which is a bike route clearly identified in Leichhardt Municipal Council's Bike Plan. The transport design (EA Appendix F) does not in any way provide access for cycling.

The Transport Assessment (EA Appendix F, p12) indicates that the Proposal "... will use half the width of Robert Street south of Buchanan Street for a distance of about 200 metres..." and that "...under the new arrangement the public section of Robert Street would have a carriageway width of 10.3 metres which would allow for two way traffic and bicycle movement as well as the potential to provide approximately 25 car spaces parked parallel to the kerb". These strategies diminish the existing provision for cycling as Robert St is presently generously wide and thus better capable of allowing cyclists to share the road with heavy vehicles. The EA does not - and should - provide detail on how the Proposal intends to segregate the proposed available carriageway width of 10.3 to accommodate both cycling in both directions and heavy vehicles.

Increases in traffic caused by the development will affect four intersections of importance to cyclists (refer EA, p62). The increased motor traffic will further impinge on available crossing times for pedestrians and cyclists, and thereby, further reducing the attractiveness of cycling. In particular, the new right turn lane proposed for James Craig Dr will significantly diminish the provision for cycling if, as suggested (EA, p65), the James Craig/ Victoria Rd intersection was to have ascribed more (traffic signal) green time to motorists.

Figure 18 of the EA (EA, p43) does not include access paths for bicycles. Bicycles should be permitted the same access as all modes indicated in the figure other than service vehicles.

## 7.4 Lack of Public Access to Foreshore

The Proposal fails to adequately provide pedestrian or cycling facilities (eg. clearly marked cycle and pedestrian paths, sufficient bike parking, lockers, showers) as required by local and state planning instruments despite the proposal to construct a new access road across the Bays Precinct, which itself will effectively sever pedestrian and cycling access to the foreshore.

Whilst the EA refers to providing such access, public access to the site is not indicated in the Proposal's plans, and there is no mention of how families with prams, children and people using wheelchairs and other mobility aids are to access the waterfront. Further, access to the foreshore - possible only on non-ship and non-function centre days - will only be permitted in a restricted area for approximately one third of the year concentrated on weekdays and winter months (page vi, EA) when public interest in the foreshore is at its lowest. This will certainly have the effect of training the habit within the community to expect that access to the foreshore is forbidden rather than encouraged.

Finally, there is nothing in the EA as to what the Proposal will provide to actually *attract* people to the foreshore area. Critically, the Proposal requires land of very high value to the community to be given over to ...a building for transitory occupation and a large car park; land uses that at most times will be devoid of human activity.

On these grounds alone, it is disingenuous of the Proposal to claim that it will provide meaningful public access to the foreshore.

## 7.5 No Green Space

Simply, the Proposal has comprehensively ignored the opportunity to introduce much needed green space (parks and trees) to the region. Irrespective of the final use to which Wharves 3-5 will be put, any Proposal must include green space. Even the proposed Function Centre would be improved by the addition of parks, gardens and/or trees.

## 8. Failure to Address Key Director General Requirements

This section outlines how the Proposal fails to address critical components of the **Director-General's Requirements (DGR's)**. Where relevant, recommendations are made to redress these deficiencies.

### 8.1 Inadequate Integration with the NSW State Plan and the Metropolitan Transport Plan

DGR: "The Environmental Assessment must consider ...its consistency with the aims and objectives of the NSW State Plan [and the] Metropolitan Transport Plan: Connecting the City of Cities".

The NSW State Plan sets a target of five per cent travel by bike across Sydney by 2016 for all trips less than 10 kilometres (NSW State Plan, p64).

A targeted goal of the Metropolitan Transport Plan is the "...completion of the highest

priority missing links in the "Sydney Strategic Cycleway Network" (Transport Plan, p29).

We urge the Director-General to compel himself to the knowledge that one of the highest priority cycling links soon to be established will be the connection between the northern end (Iron Cove) of The State Government's Greenway project (due for completion in the first half of 2012) and the western approach to the CBD via either Anzac Bridge or the Glebe Island Swing Bridge. Once connected, this will serve as one of the most significant cycling trunk routes south of the Harbour, connecting suburban Sydney to the CBD less than 10km away. Currently, the city accommodates approximately 600,000 people per day, the vast majority of whom arrive to the city by motorised transport. This future trunk route will provide the potential for significant mode-shifting from motorised vehicle trips to active transport in volumes that will not be easily achieved by other routes.

Achieving the State Government's Bike Plan's target of 5% of all trips of less than 10km being taken by bicycle by 2016 will depend heavily on evolving such trunk routes. The White Bay precinct will undeniably serve as the western gateway to the city for this route. As presented in the EA, the Proposal not only doesn't recognise this potential but - by virtue of its security-cordoned areas and its cycling-unfriendly access road - obstructs the opportunity to establish this "high priority missing link" via the Glebe Island Swing Bridge.

### **Recommendations:**

**8.1.1. That the EA be amended to have the Proposal acknowledge and integrate with Leichhardt Council's and the City of Sydney's existing and future cycling networks.**

**8.1.2. The EA must explicitly present an assessment of the Proposal's role in facilitating a connection to the Greenway cycleway.**

### **8.2 Inadequate Integration with the Glebe Island and White Bay Masterplan**

DGR: "The Environmental Assessment must consider ...its consistency with the aims and objectives of the Glebe Island and White Bay Masterplan"

Section 2.8 of the Glebe Island and White Bay Master Plan deals with "Pedestrian and Cycle Links". The EA flatly ignores this component of Master Plan. Tellingly, the principles and actions of the Glebe Island and White Bay Master Plan reflect directly the issues raised in this submission.

One of the three key principles expressed in this Master Plan is that the (White Bay) port area should

**"...encourage use of cycles by making access to the regional cycleway system convenient to the port access points."**

Section 2.8 then proceeds to prescribe the "actions" that would most directly achieve its goals. Again, tellingly, these actions reflect the recommendations of this submission. The four "actions" expressed in Section 2.8 of the Glebe Island and White Bay Master Plan are:

- Investigate a pedestrian link between the proposed main gate on the New Port Road and the nearest bus stops to facilitate public transport and pedestrian access by employees (refer to Master Plan Figure 26);
- Consider linking [the] cycleway between the proposed main gate and the proposed

cycleway in Leichhardt Council's LEP (refer to Master Plan Figure 28);

- Additional bike links should be investigated with reference to the Bays Precinct Transport Study;
- Provide links where possible to **enable continuous public access along the edge of the Port** (refer to Master Plan Figure 27).

The EA does not reflect these actions, and should do so. That they don't is a contravention of the Director-General's Requirements.

Importantly, the aforementioned directives of the Glebe Island and White Bay Master Plan make very clear that it is the responsibility of the Proposal to provide connections to the existing cycling network even *external* to its site.

### **Recommendation:**

**8.2.1. The EA must be amended to explicitly account for the Principles and Actions outlined in Section 2.8 of the Glebe Island and White Bay Master Plan (SPC, 2000) as is required by the Director-General's Requirements. Specifically, the Proposal must be amended to provide cycleway connections to the Leichhardt Bicycle network and "continuous public access along the edge of the Port".**

### **8.3 Failure to Maximise the use of non-car Transport Modes**

DGR: [The EA must] "...demonstrate how the project will ... maximise the use of public transport and non-car transport modes".

On the presumption that international cruise passenger ships do not qualify, the EA has proffered little by way of consideration of opportunities for transport by non-car transport modes (bicycles, light rail, buses).

The EA suggests that few passengers would use public transport based upon distances and the potential need to carry luggage. It is considered that this constitutes an over-simplification of current and potential future travel characteristics associated with cruise passengers and that opportunities for improving public transport access to the Cruise Passenger Terminal have not been adequately explored or developed.

Improved public transport access for White Bay could be provided during periods when ships are berthed and/or to serve ambient demand from the surrounding area. Opportunities for improved public transport access include:

- a new wharf for ferry services and water taxis to link White Bay to the CBD;
- an extension to the existing light rail between Lilyfield stop and White Bay along the existing rail easements;
- modified / improved bus services.

Critically, there appears no restriction on the Proposal ability to include internal bicycle and pedestrian paths.

### **Recommendations:**

**8.3.1. That the EA be amended to explicitly indicate connections to cycling, pedestrian and public transport (including light rail) networks.**



**8.3.2. That the EA be amended to explicitly indicate internal bicycle and pedestrian paths within the site.**

**8.4 Inadequate Integration with Existing Transport (Cycling) Routes and Networks**

DGR: "The Transport and Accessibility Impact Assessment must address ...integration with transport routes and networks".

The Proposal's lack of integration with existing and future cycling routes and networks external to the site has been outlined several times above.

**Recommendation:**

**8.4.1. That the EA should explicitly identify an integrated internal cycling and pedestrian network and its connection to the existing routes nominated in the City of Sydney and Leichhardt Council Bicycle and City of Sydney Bicycle Plans. Such connections should include, but not be limited to, Robert St, Buchanan St, Victoria Rd, Lilyfield Rd, City West Link, The Crescent, Quirk St, Anzac Bridge and the Glebe Island Swing Bridge.**

**8.5 Inadequate Integration with Public Transport Projects**

DGR: "The Transport and Accessibility Impact Assessment must address ...connectivity and interactions with current and future public transport projects".

The EA offers no recognition of the potential benefits that would accrue from connecting to the State Government's Inner West Light Rail and Greenway projects - potentially the most important suburban/City trunk route for cycling.

**Recommendation:**

**8.5.1. The EA must explicitly present an assessment of the Proposal's role in facilitating a connection to the Greenway cycleway.**

## **9. Conclusion**

BIKESydney is a stakeholder of the White Bay Precinct which is situated on a major cycling and pedestrian corridor to the Sydney CBD, and itself only a short, walking and cycling distance from the CBD.

BIKESydney opposes both the principle of siting a Cruise Passenger Terminal at the White Bay wharves and, separately, the specific scheme proposed in the Environmental Assessment for doing so. The basis of the objection is presented in the body of this submission but relates largely to the fact that key components of the Director-General's Requirements for the Proposal have not been addressed.

This notwithstanding, in the event that the Director-General deems the Proposal suitable to proceed, BIKESydney has also offered recommendations to address the deficiencies of the

Environmental Assessment with a view to improving conditions for people who cycle.

In summary, these recommendations are that:

- The Director-General should defer consideration of this Proposal until AFTER a Bays Precinct Masterplan has been completed;
- The Director-General require the Proponent to provide a publicly-available Preferred Project Report which addresses the recommendations of this submission;
- In doing so, the Director-General requires the Proponent to consult with local cycling advocacy groups such as BIKESydney, Leichhardt Bicycle Users Group (LBUG) and Bicycle NSW;
- The EA should explicitly detail an integrated internal cycling and pedestrian network and its connection to the existing routes nominated in the City of Sydney and Leichhardt Council Bicycle Plans. Such connections should be made with, but not be limited to, Robert St, Buchanan St, Victoria Rd, Lilyfield Rd, City West Link, The Crescent, Quirk St, Anzac Bridge and the Glebe Island Swing Bridge;
- The EA must be amended to explicitly account for the Principles and Actions outlined in Section 2.8 of the Glebe Island and White Bay Master Plan (SPC, 2000) as is required by the Director-General's Requirements. Specifically, the Proposal must be amended to provide cycleway connections to the Leichhardt Bicycle network and "continuous public access along the edge of the Port";
- The EA be amended to explicitly indicate connections to public transport (including tram) networks;
- The EA must explicitly present an assessment of the Proposal's role in facilitating a connection to the Greenway cycleway.

Yours sincerely  
David Borella  
BIKESydney - Vice President

email: [cityride@bikesydney.org](mailto:cityride@bikesydney.org)  
web: [www.bikesydney.org](http://www.bikesydney.org)