



**SYDNEY HARBOUR ASSOCIATION**  
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***Independent Review of Enhanced Cruise Ship Access to Garden Island, Sydney***

Sydney Harbour Association is an unincorporated body of individuals interested in Sydney Harbour, having as its primary Objects:

“[T]he promotion of the following principles in relation to development and change affecting Sydney Harbour:

- (a) protection and preservation of the natural heritage, assets and ecology of Sydney Harbour and its foreshores;
- (b) primacy of the public good over private benefit in development;
- (c) facilitation of public access to the waters and foreshores of Sydney Harbour;
- (d) protection and enhancement of the visual and recreational amenity of the waterways and foreshores of Sydney Harbour”.

Those purposes are very similar to those stated in the major NSW Government planning instruments that relate to Sydney Harbour. Their application to the present **Review** prompts these comments:

- The anticipated Panama Canal enhancements will, on completion, open up the trans-Pacific ocean traffic to much larger maritime vessels originating from the Atlantic coasts. Those vessels will be of defence, cargo, and passenger conformations. Access issues are and will be relevant to all of them, including defence vessels originating in other areas, such as Europe and USA, travelling to Sydney.
- The intermittent, highly seasonal, and ephemeral character of cruise ship travel to Sydney contrasts sharply with the more substantial and sustained nature of defence and (to a lesser extent in Port Jackson) cargo traffic.
- From that viewpoint, consideration of access issues flowing from the likely enlargement of vessels engaged in passenger cruise ship traffic to Sydney is not merely a local issue, but is a (relatively minor) component of the outcome of the major international maritime development at Panama.
- Whether undertaken occasionally or regularly, the provision of accommodation for cruise passenger vessels at Garden Island should not pre-empt or compromise the

public interest in the on-going efficiency and development of the primary defence role of that depot.

- The public interest in the heritage value of Garden Island's *hammerhead crane* is considerable. Our Association would not support the removal of the crane for the purpose of facilitating cruise passenger ship access to Garden Island facilities.
- The scarcity of large vessel accommodation east of Sydney Harbour Bridge reflects not only the fixed height of the bridge deck and the gradual enlargement of vessels, but also the outcome of past decisions relating to berth facilities at Woolloomooloo Bay. The latter may now be viewed as having been short-sighted. Woolloomooloo Bay provides an object lesson for the present: no alienation of the working harbour foreshore should be undertaken that cannot be reversed with reasonable alacrity and reasonable expenditure.
- Scarcity is often managed by rationing, preferably with transparent and appropriate pricing mechanisms. However, we understand that *per/passenger* charges are not levied by the port authority on cruise passenger operators in Sydney. Given that the present issues are directly related to the passenger numbers accommodated in the larger vessels, it seems to us that an efficient port management authority might sensibly engage such a pricing mechanism in its administration of berth allocation for cruise passenger vessels, or explain cogently why that approach should not be employed for the purpose of enabling fair and market-based allocation of available large-vessel berthing capacity.
- In the Sydney context, there is a notable degree of concentration of cruise operations in just two large groups. Berth capacity allocation efficiency for very large vessels may well be enhanced by co-operation among cruise operators in scheduling Sydney calls. While that may raise issues of competitive collusion, we think the Australian competition regulatory authorities could readily ensure fair play.
- It is conceivable that Garden Island lacks facilities that would be of significant benefit to its defence role, and that cruise operators might benefit from them too. While the Review's *Terms of Reference* and associated materials have not indicated to us any such potential, we accept that it may exist, and that co-operative funding could enhance the provision of needed enhancements. We emphasise that any such arrangement needs to ensure that there is no infringement of the primacy of the defence role of Garden Island, nor should (or could) any mutual investment be taken to constitute the establishment of a right-of-access by passenger cruise vessels to Garden Island.

On behalf of Sydney Harbour Association:  
Michael Rolfe, President



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