

12 December 2022

The Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

*Electronic submission*

To whom it may concern

## **Re Sydney Olympic Park Metro Station – Over and Adjacent Station Development**

The Metro West project is a critical piece of infrastructure for Sydney. By linking the west with the Sydney CBD, it will advance aims to transform Sydney more into a 30-minute city.

The proposal for the Sydney Olympic Park metro station precinct is an important component of the Sydney Metro West. It is vital that the Government gets the planning framework right and maximises the return to the public on a significant investment of public money into transport infrastructure.

### **Proposed heights and densities**

The Sydney metro west project commits significant amounts of public money – with many estimates suggesting the project could cost up to \$30 billion. We need to ensure that we maximise the return on this public investment by promoting employment and housing to the maximum extent possible.

The NSW Productivity Commission's White Paper 2021 recommended that the Government deliver housing where there is transport capacity.<sup>1</sup> Sydney is amidst a housing supply crisis, and the opportunity to deliver housing stock immediately adjacent to or even on top of two strategically located metro stations should not be missed.

The proposed heights and densities for the Sydney Olympic Park metro precinct are conservative, reflecting the myopia of those that helped deliver the shortages in housing we currently face. The proposed heights are RL 119.00 for Building 1, RL 114.20 for building 2 and RL 171 for building 3. These

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<sup>1</sup> NSW Productivity Commission, White Paper, 2021, p.311

should be increased to provide for considerably more housing. The SSD only anticipates the construction of approximately 316 dwellings. Given that we are in the midst of a housing supply and affordability crisis, the Government should consider greater height and FSRs to accommodate more residential development in such a strategic site.

Combining with rezoning, this would allow the Government to deliver more housing, and possibly provide for a higher percentage of key worker/affordable housing.

**Recommendation 1 – given the strategic location on top of a metro station, the NSW Government maximise heights of the proposed buildings to deliver more residential housing in Sydney Olympic Park metro precincts. The current proposal represents a rare opportunity lost unless a re-think is applied**

### **Correlation between business case underpinning original budget commitment for large transport infrastructure and expected development outcomes**

The Sydney metro west project commits significant amounts of public money – with many estimates suggesting the project could cost up to \$30 billion.

The NSW Productivity Commission's White Paper also recommended that the Government needs to public justify infrastructure spending.<sup>2</sup> Besides public transport considerations, there needs to be consideration given much earlier in the decision-making process on large, expensive infrastructure projects like Sydney metro west.

A significant Government decision of a project such as the Sydney Metro West would be accompanied by a detailed business case, which would have included specific outcomes/benefits, including anticipated residential development adjacent to or on top of transport infrastructure. The anticipated benefits that underpinned the business case should be carried over into the subsequent developmental outcomes associated with any transport

Delays between allocating funds to infrastructure and development gives rise to community opposition at later stages of the project. This is currently evident in the proposed developments around the Marrickville and Dulwich Hill metro stations on the Sydenham to Bankstown corridor. This was compounded when the NSW Government handed back planning control to Council over the associated development around the new metro stations. Now opposition

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<sup>2</sup> NSW Productivity Commission, White Paper, 2021, p. 311

is so entrenched that Inner West council has postponed any decision on its LEP which proposed greater heights and densities around these transport projects. A similar tendency can be detected in the conservative residential proposals attached to the Government metro precinct proposals at the Bays Precinct and Cherrybrook.

To have public exhibitions on zoning, densities and heights well after the decision to allocate funding for large public infrastructure projects risks the under delivery of public goods such as new housing, commercial space as well as other social infrastructure that would help justify these projects in the first place. There needs to be much stronger correlation between the decision to fund a particular infrastructure project and the development that will ensue on completion of the project.

Besides creating greater certainty and transparency around Government decision making, it will also help ensure maximising outcomes from any such decision. The rivers of gold from the initial rounds of asset recycling cannot be assumed or expected to continue, and it is critical that the Government in the future maximise the public return on these mega projects.

Governments need to be transparent with the community in explaining the expectations around suburbs and localities that will benefit from the NSW taxpayers allocated significant amounts of funding towards such projects.

**Recommendation 2: in order to establish stronger correlation between decisions to fund infrastructure projects and the expected development outcomes which underpin the business case justification for the funding of the project, the NSW Government should lock in those development expectations, as per those included in the business case, at the time of the original funding decision**

### **Camelia metro station**

The Sydney Metro West is a critical transport infrastructure project for Greater Sydney. Urban Taskforce iterates its calls for the Government to include a metro station at Camelia.

We note that the distance between Sydney Olympic Park and Parramatta is approximately 7 kilometres. It is highly unusual for metro rail lines to have such long distances between stations and we believe it would be a significantly missed opportunity to deny the location of an additional metro station west of Sydney Olympic Park at Camellia.

The Government appears to have moved away from Andrew Constance's pre-occupation with travel time for the Metro rather than seeing it as every

planner and commentator now does, a chance to shape the housing and employment patterns for the future Greater Sydney.

The Camellia Landholders Alliance commissioned an analysis of an alternative route incorporating a metro station at Camellia which could be delivered through an additional 200 metres of tunnelling. Such a small amount of tunnelling should be prioritised and viewed as a city building project supporting the NSW Government's vision for Parramatta as Sydney's Central City.

We see clear strategic land use planning and transport alignment for Sydney Metro West at Camellia. The City of Parramatta's executive leadership and elected councillors express a strong preference for a station at Camellia, and the Council's Local Strategic Planning Statement, as endorsed by the then Greater Sydney Commission, highlights the critical importance of Camellia to Parramatta as a future centre which could provide 5,000 jobs and 10,000 dwellings. This is significantly greater than the benefits accrued to Camellia in the GSC's analysis.

Camellia holds long-term potential to strategically extend the land footprint of the Parramatta CBD by rezoning employment lands as exhibited by DPE in 2018 as a 'Planned Precinct'. This would broaden the Camellia peninsula's economic base and transition towards an integrated mixed-use employment and residential hub, including a high-density core of smart jobs in commercial office and other employment in Camellia. This option has the potential to support a large increase in employment in the Camellia/Rosehill SA2 in 2050 from 65,000 jobs without renewal to up to 131,000 jobs with renewal – catalysed by Sydney Metro West.

Retrofitting a new metro station would come ultimately at a greater cost and disruption. Given the significance of the Sydney Metro West to how Greater Sydney lives, works and operates well into the future, Urban Taskforce again implore the Government to reconsider a Camellia metro station as part of the Metro West project.

**Recommendation 3: given the significance of Sydney Metro West, that the NSW commit to delivering a metro station at Camellia**

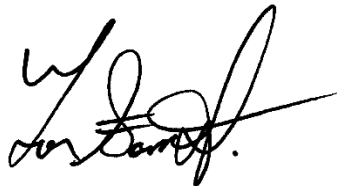
## **Conclusion**

The Sydney Metro West is a critical transport infrastructure project for Greater Sydney. It is important that the SSD pathway ensures flexibility and scale in order to achieve the economic and social objectives of this significant investment of public funding. The Government has one opportunity to get this

right, and the Urban Taskforce implores the Government to ensure the development can achieve maximum returns in meeting critical objectives of housing close to employment and transport.

Should you wish to discuss this matter further, please call our Head of Policy, Planning and Research, Stephen Fenn on 9238 3969 or via email [stephen@urbantaskforce.com.au](mailto:stephen@urbantaskforce.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

**Tom Forrest**  
Chief Executive Officer

## **Recommendations**

**Recommendation 1** – given the strategic location on top of a metro station, the NSW Government maximise heights of the proposed buildings to deliver more residential housing in Sydney Olympic Park metro precincts. The current proposal represents a rare opportunity lost unless a re-think is applied

**Recommendation 2:** in order to establish stronger correlation between decisions to fund infrastructure projects and the expected development outcomes which underpin the business case justification for the funding of the project, the NSW Government should lock in those development expectations, as per those included in the business case, at the time of the original funding decision

**Recommendation 3:** given the significance of Sydney Metro West, that the NSW commit to delivering a metro station at Camelia