Comment on SSD6013, Haymarket precinct and SICEEP 18 July 2013

Replacement of Darling Harbour convention, exhibition and entertainment facilities is long overdue. The competitive inadequacy of existing facilities is generally accepted as contributing to a relative decline in this State's share of the growing and lucrative regional events tourism market. Fewer professional and technological events also means that Sydney misses out on the kinds of exchanges that stimulate innovation, causing Sydney's high-value competitive regional advantage to diminish further. It is therefore vital that new world-class event facilities are developed close to Sydney's heart and that every effort is made to knit these new facilities into the economic, physical, cultural and social fabric of Sydney; a failure to do so is a persistent criticism of the existing facilities and their location.

The NSW government selected a consortium lead by Lend Lease to build new facilities in the same Darling Harbour precinct. Conforming to an overall Precinct Plan, development applications are being lodged for separate elements within the northern "SICEEP precinct", within which new event facilities will be developed, and the southern "Haymarket precinct", which will include a mix of commercial, residential and other related development. Delivery by 2016 will require commercial agreements soon, with site works commencing soon after.

Currently, three State Significant Development Applications are on public exhibition at the Department of Planning and Infrastructure (DoPI) – SSD6010, -6011 and -6013. Environmental Impact Statements (EIS's) for each of the three current applications include at "1.4.2" a discussion of alternative options for the entire project. Though the serious prospect of alternatives has, to some degree, been overtaken by the State government's decision, persistence of this discussion in individual EIS's invites fresh analysis of options against contemporary events. Further, recent announcements concerning a new hotel and casino are evidence that government is encouragingly responsive to new opportunities not contemplated when projects as advanced as Barangaroo were first declared.

The following comment therefore responds to that invitation and this background. Though made with particular reference to application number SSD6013 for 'mixed-use commercial office building and public car park', the observations offered also apply to the precinct and SICEEP proposal more generally.

Firstly, the discussion of alternative options for new facilities at EIS "1.4.2" is not complete. Previous governments commissioned a number of reports that considered different options including locating replacement event facilities above Central Station rail yards. Though dismissed at the time as too difficult, no reports actually assessed this option in any detail. In its Sustainable Sydney 2030 vision, the City of Sydney raised the idea again. It is understood that the proposition, along with qualitative reasons to do so, was raised with the Sydney Harbour Foreshore Authority – the agency originally responsible for improving existing event facilities – and subsequently with Infrastructure New South Wales (INSW) – the current responsible agency. The reasoning is also summarised in the City's submission to a recently completed enquiry into Utilisation of Rail Corridors, conducted by the NSW Legislative Assembly Committee on Transport and Infrastructure (see: http://www.parliament.nsw.gov.au/prod/parlment/committee.nsf/0/9e777cf898659349ca2579 bb0016b959/\$FILE/Sub.53.pdf).

Essentially, the reasons are that:

- there are potential State benefits to new event facilities being located closer to significant transport infrastructure;
- land released in Darling Harbour would be more valuable and could cross-fund decking over Central – if it accommodated more intense and highly productive CBD uses, and;
- new event facilities above Central Station could augment adjoining high-value innovative land uses and deliver thereby further State-wide benefits;
- low-rise event structures are more compatible with longer spans required above stations than more intensive development, such as apartments and commercial offices;

• compared with State ownership of convention facilities, land use conflicts with private apartment and commercial development are likely to restrict unreasonably the adaptation and operation of the State's premier passenger rail asset.

Low-rise event facilities above and near rail stations of the type and scale suggested by the City are reasonably common; examples include:

- Event, open space and exhibition facilities at Federation Square, Melbourne;
- Adelaide Convention and Exhibition Centre, currently being expanded;
- · Event and open space, Millennium Park, Chicago;
- Proposed new sporting and convention facility above, and exhibition centre adjacent to, Hudson Yards, New York (see: http://www.nyc.gov/html/dcp/html/hyards/hymain.shtml#vision and http://www.nyc.gov/html/dcp/pdf/hyards/hy zoning 012005.pdf)
- Stockholm convention centre adjacent to rail yards, Sweden

Secondly, a number of recent events have altered the context against which the original State government commitment to SICEEP was made. These include:

- Release of the second phase of the High Speed Rail (HSR) study, which identifies
 Central Station as a terminus (see:
 http://www.infrastructure.gov.au/rail/trains/high_speed/files/HSR_Phase_2_Chapter_4.pd
 f);
- Press-reported availability of Harbourside Shopping Centre site and IMAX site in the north Darling Harbour precinct, not currently included in SICEEP precinct plans;
- "Utilisation of Rail Corridors" report, recommending better use of State land;
- Planning White Paper and attendant State commitments to better coordinate and integrate infrastructure investment and growth;
- Metro Strategy with jobs targets and Global Sydney "City Shaper" also emphasising a whole-of-city approach with better integration of infrastructure provision and growth;
- The Metropolitan Strategy target of 102,000 jobs within Central Sydney to be accommodated by 2031. Noting that when complete, Barangaroo, will accommodate up to 23,000 jobs (refer http://www.barangaroo.com/news-media/news-archive/2011/october/25-october-premier-kicks-off-major-constrution-at-barangaroo.aspx), the equivalent of an additional Barangaroo will need to be developed every 4-5 years over the next 18 years, and;
- State government announcement seeking expressions of interest in development above and near rail lines from Central Station to Redfern suggests up to 1,000,000 square metres of space might be delivered.

Thirdly, a number of circumstances are likely to shape Central Sydney during the 30-year business-case period of SICEEP in Darling Harbour:

- If HSR proceeds, the first sector between Sydney and Canberra could commence as early as 2022, with planning and 'enabling works' at Central Station beforehand, early within the operational time-frame of a new SICEEP (tables 1,2, http://www.infrastructure.gov.au/rail/trains/high_speed/files/HSR_Phase_2_Keyfindings_ES_Booklet.pdf);
- Construction of HSR terminal at Central would require significant disruption to country line platforms and approaches, the cost of which would be absorbed within the HSR station structure and, thereby, be removed as an impost weighing against construction of SICEEP above Central Station (see 5.5.3, http://www.infrastructure.gov.au/rail/trains/high_speed/files/HSR_Phase_2_Chapter_5.pd
- The development above rail lands announced by the State will only likely occur on the longer term after development opportunities closer to Central Sydney are exhausted. These opportunities include land currently affected by the Western Distributor road decks, the northern parts of which run through arguably the most expensive real estate in the nation. The relative simplicity and value of 'recovering' this land compared with

Central Station – and the benefits of expanding opportunities for high-value jobs within the financial centre of Sydney adjacent Barangaroo – will likely focus commercial interest well north of Central for some time. This focus will likely then move slowly south to the balance of the Western Distributor, yet the proposed SICEEP would occupy land below Darling Harbour road-decks, thereby preventing its recovery and growth of the CBD when it will likely be needed;

- Significant growth of Central Sydney and Sydney more broadly will be limited by current at-capacity public transport unless a second harbour rail crossing is built. This, in turn, will require new stations at Central, the accommodation and operation of which will likely be complicated by any private commercial and residential development – a circumstance less likely to arise with a low-scale, large-span, state-owned SICEEP on the same land, and planned accordingly;
- The Victorian government announcement on 29 October 2010 to expand the Melbourne Convention and Exhibition Centre (MCEC) from existing 30,000 to 42,000 square metres. If built, the expansion would make MCEC larger than the proposed SICEEP. MCEC is currently attractive to exhibitors, being column-free, easily subdivided, and on one level.

In summary – and uniquely for the city – the future of the entire western edge of Central Sydney down to Redfern is currently 'on the table'.

The identification of additional development areas – such as the recent State announcement for Central – is crucial, but should be informed by careful appraisal of the best use of State land. Early press commentary welcoming the State's Central Station announcement also alerted to the difficulty – and cost – of building high-rise development so close to rail tracks. The problem is well known to government; State Significant Development above Chatswood Station required significant and costly noise abatement and constructional measures. Further, land ownership expectations are not well matched to the operational requirements of the State's premier passenger rail asset that will be expected to adapt in response to Sydney's – and the nation's – growth.

Evidence that the State is optimising its own assets is important to attract national investment in nation-building assets within Sydney. Ill-considered or poorly integrated proposals were reported as reasons why national funding applications for Sydney Metro and North West Rail link were not successful.

The Planning White Paper and Metropolitan Strategy for Sydney to 2031 have raised expectations that the State has 'changed its ways' and will now plan its assets much more carefully. Failure to do so with SICEEP would signal little intention to deliver on this promise.

The State will reportedly invest \$1 billion in the SICEEP project, with additional unspecified annual service payments over the next 30 years; some 8 electoral cycles. Under its Act, INSW is required to:

- "review and evaluate proposed major infrastructure projects;
- exercise its functions with a view to achieving the objects of the (INSW) Act;
- (which are) to secure the efficient, effective, economic and timely planning, co-ordination, selection, funding, implementation, delivery and whole-of-lifecycle asset management of infrastructure that is required for the economic and social well-being of the community, and:
- to ensure that decisions about infrastructure projects are informed by expert professional analysis and advice."

Consequently, INSW will already have analysed and evaluated all the foregoing contemporary events and remains supportive of the current proposal in light of this work. This contemporary analysis should therefore be included within the 'alternative options' section of current and future applications so that assessment can then determine the extent to which SICEEP satisfies the objectives of the EP&A Act, particularly that it continues to represent "...orderly and economic use and development of land".