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Department of Planning, Industry & Environment
320 Pitt Street
Sydney NSW 2000

Attention: Belinda Scott
By email: Belinda.Scott@planning.nsw.gov.au

Dear Belinda

City of Sydney submission on Sydney Metro West Concept and Stage 1 - EIS

Thank you for the opportunity to provide comments on the Environmental Impact Statement (EIS) for the Sydney Metro West Concept and Stage 1 State Significant Infrastructure project (the Metro West project).

The key points that the City of Sydney (the City) wishes to raise are provided in the following pages.

Should you wish to speak with a Council officer about the above, please contact Elise Webster, Manager Transport Major Projects on 9265 9333 or at ewebster@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director
City Planning | Development | Transport

1. Introduction

The development of a new Metro connection between Sydney and Parramatta and the expansion of the Metro system is a positive step forward for metropolitan Sydney. The City has supported the Metro West **concept** since first proposed.

The key to its success as a **project** is securing the right number of stations, in the right places.

The detailed geographic scope of the Metro West project, as currently committed, is outside the City's LGA. The City's submission therefore focusses on issues that need to be addressed in the Stage 3 assessment, which will include the Bays Precinct-City Centre section of Metro West. The key issue is the absolute need for a station at Pyrmont, and the submission addresses:

- the significant productivity benefits of linking media, communications, arts and recreation, tourism and education and innovation industries with a broader catchment of workers
- the growth in population and jobs in Pyrmont
- how the right number of Metro West connections (stations in the right places) maximises rather than reduces overall economic benefit
- the need to create redundancy in the system to mitigate the risk of operational failures
- the advanced stage of the NSW Government's Pyrmont Peninsula Place Strategy and recommends that decisions relating to a **preferred station location** be deferred or co-ordinated with the Strategy.

The submission also identifies the need for a new Metro line from the City Centre to Randwick and makes the case for the line to include a station at Zetland to address the significant congestion in Green Square. The new line should link the University of NSW, University of Sydney and University of Technology Sydney, Royal Prince Alfred Hospital and Prince of Wales Hospital. The line is needed by 2030.

2. Concept scope and staged assessment

Given the key decisions not yet resolved (Pyrmont station, and location of City Centre station), the City accepts that there are some benefits to breaking down the planning approvals and environmental impact assessment of Sydney Metro West into the following stages:

- Sydney Metro West at a Concept level (the current EIS)
- Stage 1 – All major civil construction works between Westmead and The Bays including station excavation and tunnelling (the current EIS)
- Stage 2 – All stations, depots and rail systems between Westmead and The Bays (future EIS to be prepared)
- Stage 3 – All major civil construction works including station excavation, tunnels, stations, depots and rail systems between The Bays and the Sydney CBD Station, and operation of the line (future EIS to be prepared).

However, the delay in the resolution of the Pyrmont station investigations limits the ability of stakeholders to critically review key elements of the current EIS, especially the Metro West **concept**. This is because the concept is primarily about the places that the Metro will connect to, with technology and product elements (the *Metro experience*) important in providing those connections.

Similarly, it is not possible to weigh the costs and benefits to the overall concept of other, committed stations against the costs and benefits of a Pyrmont Station.

The City provided a significant input to the Secretary's Statement of Environmental Assessment Requirements on 11 November 2019, copy attached as Appendix 1. In its submission the City set out key issues to be considered in the EIS. These included: consideration of the '30 minute city' concept; the overarching issue of travel time; broader consideration of the productivity and economic impacts of Sydney Metro West; and an assessment of integrated transport and landuse outcomes. These are key arguments supporting the case for a station at Pyrmont but not addressed in any detail in the EIS. They are also only partially reflected in the NSW Government's Pyrmont Peninsula Place Strategy (to some extent, they explain why there is a Strategy).

It is imperative that these matters be addressed in the investigations into the potential for a station at Pyrmont, being undertaken by Sydney Metro, and the subsequent consideration by the NSW Government.

3. Pyrmont Station

3.1. Critical need for station

The City has consistently set out the case for a station at Pyrmont to maximise the wider economic benefits of Metro West. The City acknowledges that the NSW Government is investigating whether to include a station at Pyrmont and is also potentially leading the Pyrmont Peninsula Place Strategy (see Section 3.6).

The City agrees with the statement in the EIS that the Greater Parramatta to Sydney CBD corridor is a city shaping corridor. It links health, education and research precincts at Westmead; the Parramatta CBD; the lifestyle and employment precinct at Sydney Olympic Park; the proposed innovation and technology hub at the Bays; and the Sydney City Centre.

Metro West will also need to perform a "city serving" function along the corridor, with very significant levels of existing activity, including at Pyrmont.

The City's Local Strategic Planning Strategy sets out the City's goal of working with NSW Government agencies and others to develop a land use framework for the Pyrmont-Ultimo peninsula that:

- promotes employment growth, visitor accommodation, affordable enterprise space, high technology industry, retail, community and cultural uses
- facilitates improved environments for walking and cycling
- maximises the interchange between public and active transport.

However, the map of "planned growth areas" at Figure 2.2 does not identify this – Pyrmont is not identified as a significant site, despite its existing high employment and

resident population and its potential employment growth under the Pyrmont Peninsula Place Strategy.

While the Pyrmont station resolution is outside the formal geographic scope of the EIS, other strategic opportunities well outside the scope of Metro West **are** included here (former Carlingford Line; Parramatta Road corridor through Inner West Council.)

The Greater Sydney Commission's Region and District plans, and the City's Local Strategic Planning Statement, all speak to the importance of getting the planning right for this corridor. Pyrmont in an expanding Harbour CBD is pivotal to that success.

Failure to identify the potential opportunity in this key graphic suggests a disconnect between the project and broader placed based processes.

3.2. Growth in population and jobs – opportunity for significant productivity gains

The strategic context notes that Sydney will experience significant population and employment growth in the coming decades.

In support of the City's argument that a station should be located at Pyrmont, the City notes that:

- Pyrmont is a pivotal location in the Eastern City District's Innovation Corridor which could accommodate up to 53,800 additional jobs by 2036. The media, communications, arts, recreation and tourism sectors are currently located in Pyrmont while the education and innovation industries are clustered in Ultimo to the south. This will occur across the myriad of existing employment nodes throughout the peninsula as well as at a small number of larger redevelopment locations.
- Growing business and enterprise throughout the Harbour CBD, which includes Pyrmont, is critical to Sydney's continued global competitiveness. A station at Pyrmont will be a catalyst for economic and employment growth in the area.
- Preliminary desktop modelling by the City based on available data suggests it is possible for Pyrmont to realise significant gains in labour productivity, GDP and GVA. This is in part due to new businesses establishing, existing local businesses scaling up and businesses relocating from other areas.
- A metro station at Pyrmont would establish a continuous employment corridor linking Central Sydney, Pyrmont and the future Bays Precinct, accelerate the growth of employment clusters and ensure The Bays and The Bays Market District are not isolated from the Harbour CBD.
- By 2036, Pyrmont–Ultimo will be home to more jobs and residents than the NSW Government's urban renewal precincts of Camellia and Rydalmere combined. Pyrmont is currently Australia's most densely populated suburb with more than 16,000 people per square kilometre – this alone warrants a rail station.

3.3. Travel time

The NSW Government's *Future Transport 2056* and *The Greater Sydney Region Plan – a metropolis of three cities* share a vision of a City where people can access jobs and services in their nearest metropolitan and strategic centre within 30 minutes by public transport, seven days a week.

To achieve this vision, the stations and their spacing would ensure that the maximum number of residents would be able to reach Parramatta and/or Sydney, and other strategic centres, within 30 minutes;

The City does not support the simplified interpretation of the 30-minute City concept to a desire for the shortest possible travel time between Parramatta and Sydney e.g. 20 minutes, especially at the expense of appropriate intermediate stations.

The City's view, outlined in its 2018 submission to the Sydney Metro West Project Overview, is that the right number of connections (stations in the right places) maximises rather than reduces overall economic benefit.

3.4. Lack of stations limit the catchment served

If the Pyrmont station does not proceed, there may be one metro station serving the future Harbour CBD (at around Hunter Street). The next closest metro stop would be at Bays Precinct, in Rozelle. This will limit connectivity both within the CBD and its catchment.

The City notes this proposed spacing is in stark contrast to spacing and location of stations on the Sydney Metro City & Southwest line. It is also in contrast to the station spacing on the Sydney Trains (non-metro) network in inner Sydney.

A station at Pyrmont provides an additional point of access to Sydney Metro West for the City Centre as it expands its innovation and visitor sectors.

3.5. System safety, resilience redundancy - reliance on CBD station

The City is concerned about the implications of a significant operations failure at a single CBD terminus station and is unclear what the contingency plan would be for commencing operations at The Bays metro station. More importantly, it is not known how city centre passengers would access The Bays if there is an access or service issue in the sole CBD station - it is too far to walk.

Pyrmont is sufficiently close and well connected to respond to this situation.

3.6. Pyrmont Peninsula Place Strategy will provide further justification for station.

It is the City's view that Metro now has sufficient information to prove the need for a station at Pyrmont. However, should the NSW Government not be convinced, the City stresses the need for a final decision to be reserved until the Pyrmont Peninsula Place Strategy is sufficiently advanced to outline the productivity/growth potential of Pyrmont with and without a Metro Station.

Work on the NSW Government's Pyrmont Peninsula Place Strategy (the Strategy) is well advanced following on from the adoption of the recommendations flowing from the Greater Sydney Commission's (GSC) Planning Framework Review of the Pyrmont Peninsula (the Review) in September 2019.

The GSC made it clear that planning for the area must align with the Greater Sydney Region Plan and the Eastern City District Plan, in particular the Innovation Corridor role

of the area set out in District Plan Planning Priority E7. This will realise cumulative benefits for the Harbour CBD.

The Strategy is intended to contain:

- a simplified planning framework that co-ordinates the delivery of the Place Strategy
- a place-based master plan that addresses the District Plan, including:
 - identification and characterisation of the sub-precincts, including Blackwattle Bay
 - development of principles to respond to the individual character and potential of the sub-precincts
 - the development of an economic strategy and industry attraction program that recognises the potential of the Pyrmont Peninsula in growing a stronger and more competitive Harbour CBD.

The Region and District Plans state that delivery of high-quality place-based outcomes requires integration of site-specific planning proposals with precinct-wide place and public domain outcomes through place-based planning.

If the proponent decides against the need for a station at Pyrmont, perhaps founded on a narrow project-based view before the Strategy has demonstrated the productivity and growth potential a station offers, it may undermine the NSW Government's wider Innovation Corridor vision for the Pyrmont Peninsula and the economic potential that Blackwattle Bay represents as majority owned government land at the heart of the Harbour CBD.

The NSW Government at this time has committed to adopting the Strategy before the end of 2020. Any final decision on a station at Pyrmont must wait until the Strategy is finalised.

RECOMMENDATIONS

- That the NSW Government commit to a station at Pyrmont now, for inclusion in the Stage 3 EIS.
- If the NSW Government cannot make that commitment now, that DPIE directs the proponent to set aside a decision about a station at Pyrmont until the Pyrmont Peninsula Place Strategy is complete and has been considered.

4. Metro Next

With the advent of Sydney Metro Northwest; Sydney Metro City & Southwest; Sydney Metro West; and Sydney Metro – Western Sydney Airport, the Metro network will link:

- Western Sydney and Macquarie Universities
- Westmead and North Shore Hospitals
- Greater Parramatta and the Olympic Peninsula
- the area covered by the 'Western Sydney City Deal' including the Aerotropolis

- the Macquarie Park to Sydney economic corridor.

Transport for NSW is considering extending the Metro network from the northern City Centre to Randwick and the City notes that *Future Transport* identifies this as a key corridor. A Metro serving the corridor will link:

- the University of NSW, University of Sydney and University of Technology Sydney
- Royal Prince Alfred Hospital and Prince of Wales Hospital
- Randwick with the Ultimo Camperdown innovation districts

The line would include a station at Central, providing a focal interchange to the metropolitan public transport networks. A Metro West station will also further support the significant redevelopment occurring in the Central precinct.

The addition of a Sydney Metro City (North) to Randwick line will supercharge the productivity gains of Sydney's metro through this century. The sooner it is built, the better.

A Sydney Metro City (North) line would allow the development of a station at Zetland in east Green Square. The City had strongly argued that Metro West should extend at least as far as Zetland. Now that Metro West ends at the City Centre, it is imperative that the next Metro line is planned and constructed as soon as possible, to address the need and opportunity for connections in the City's south and south-east.

Transport in and around Green Square is increasingly under pressure. Green Square is one of Australia's largest urban renewal areas, with currently more than 30,000 residents and plans for 60,000 to 70,000 residents and 21,000 workers by 2030. There is significant congestion on roads, buses and trains at peak times and there will be greater pressure on roads and public transport as the population and employment increases. Addressing the demand for additional transport services to serve both existing and future populations is critical.

Failure to deliver a rail solution for Green Square will mean the largest planned urban renewal area in NSW will be overcome with congestion. This represents a significant productivity loss for Greater Sydney.

RECOMMENDATION

That the NSW State Government outline a concept and funding plan to ensure the opening of a new Metro line from the northern City Centre to Zetland (and preferably Randwick) by 2030.

5. Construction impacts

The City reserves its comments on construction impacts until the key issues addressed in its submission are resolved.