

**Submission
No 15**

SYDNEY METRO WEST PROJECT

Organisation: City of Sydney

Date Received: 19 September 2023

Metro West

Submission to the Committee on Transport and Infrastructure



Contents

1. Introduction	3
1.1. Purpose of submission	3
1.2. Terms of reference	3
2. Response to Terms of Reference	4
2.1. Metro West Business Case	4
2.2. Route alignment and station selection	5
2.3. Cause of blowouts in project costs and timelines	6
2.4. Ministerial consideration of consequential benefits	7
2.5. Other matters	7
2.6. Attachments	9

1. Introduction

1.1. Purpose of submission

This document provides the City of Sydney (“the City”) submission to the Committee on Transport and Infrastructure Inquiry into Metro West (“the Inquiry”).

The Submission draws primarily on submissions the City has made to the NSW Government since 2017:

- Project Overview 2017
- Project Overview 2018
- Stage 1 Secretary’s Environmental Assessment Requirements (SEARS) 2019
- Concept and Stage 1 Environmental Impact Assessment 2020
- Amendment Report and Submissions Report 2020

These documents are **attached** for information. The City notes the overlap between this Inquiry and the NSW Government’s Sydney Metro Independent Review, led by Mr Mike Mrdak and Ms Amanda Yeates.

The City also notes the much larger scope of that Review, and the potential for confusion from two inquiries exploring the same material concurrently.

Key City of Sydney issues are outlined in Sections 2 – 6 of this submission.

1.2. Terms of reference

The City’s submission will respond directly to the Inquiry’s Terms of Reference:

That the Committee on Transport and Infrastructure inquire into and report on the Sydney Metro West project, with reference to:

- a) The original business case for the project*
- b) The establishment of the route and selection of station locations*
- c) The cause of blowouts in project cost and timelines*
- d) Whether the Minister at the time considered any other consequential benefits that could be achieved from the project*
- e) Other matters relevant to the Sydney Metro West project*

Sections 2.1 to 2.5 of this submission are structured to reflect the Inquiry’s Terms of Reference a) to e).

2. Response to Terms of Reference

The city has structured our response along the lines of the Terms of Reference for the Inquiry.

2.1. Metro West Business Case

The City supports the function of business case development to assess the full range of benefits and costs associated with projects.

The City notes that infrastructure proposals in NSW are assessed against central agency evaluation frameworks. The City's general position is that these need revision over time, to incorporate more fully issues such as agglomeration benefits, resilience and climate adaptation. This will help support the inclusion of more stations on future rail links.

The City's previous submissions have highlighted the range of benefits that contribute to the positive business case:

- Connecting Parramatta and the Sydney city centre, and numerous high value centres along the corridor, and then Zetland (Green Square) and Randwick and the southeast
- Assisting planning strategy implementation, by creating new opportunities for high quality commercial and residential growth, supported by a range of activities that would generate Metro patronage
- Boosting productivity in centres by creating agglomeration benefits and providing greater access to workers and markets for businesses within Metro precincts
- Significant time savings for end to end and intra-corridor movement, especially by public transport
- Capacity relief on Sydney Trains Main Western Line
- Avoided costs in amplifying or providing alternative public transport solutions

The City's previous submissions have highlighted key concerns about the Business Case development for Metro West:

- Lack of clarity about the scope being assessed
- The scope initially included Zetland, which was then removed, and then subsequently discussed as a possible extension
- No resolution (at the time) on stations such as Pyrmont, meaning that those locations effectively had standalone business case assessments (not applied to other potentially lower value stations, such as Five Dock)
- Use of "staging" nomenclature, even within the corridor between Westmead and the Sydney City Centre
- This nomenclature related to "stage in planning process", not proposals to build and operate consecutive stages of a larger Metro line (the approach undertaken for Metro NorthWest and City and SouthWest – being constructed at the time Metro West was being planned)
- Over-emphasis on achieving a 20-minute travel time from Parramatta to the northern Sydney city centre

- No evidence that this was the key benefit of the Metro, especially compared to options that connected additional, high value places such as Pyrmont, and were still 5-10 minutes faster than the current Sydney Trains travel times
- The City’s 2018 submission expressed the optimum relationship between end to travel and intermediate connections as such:

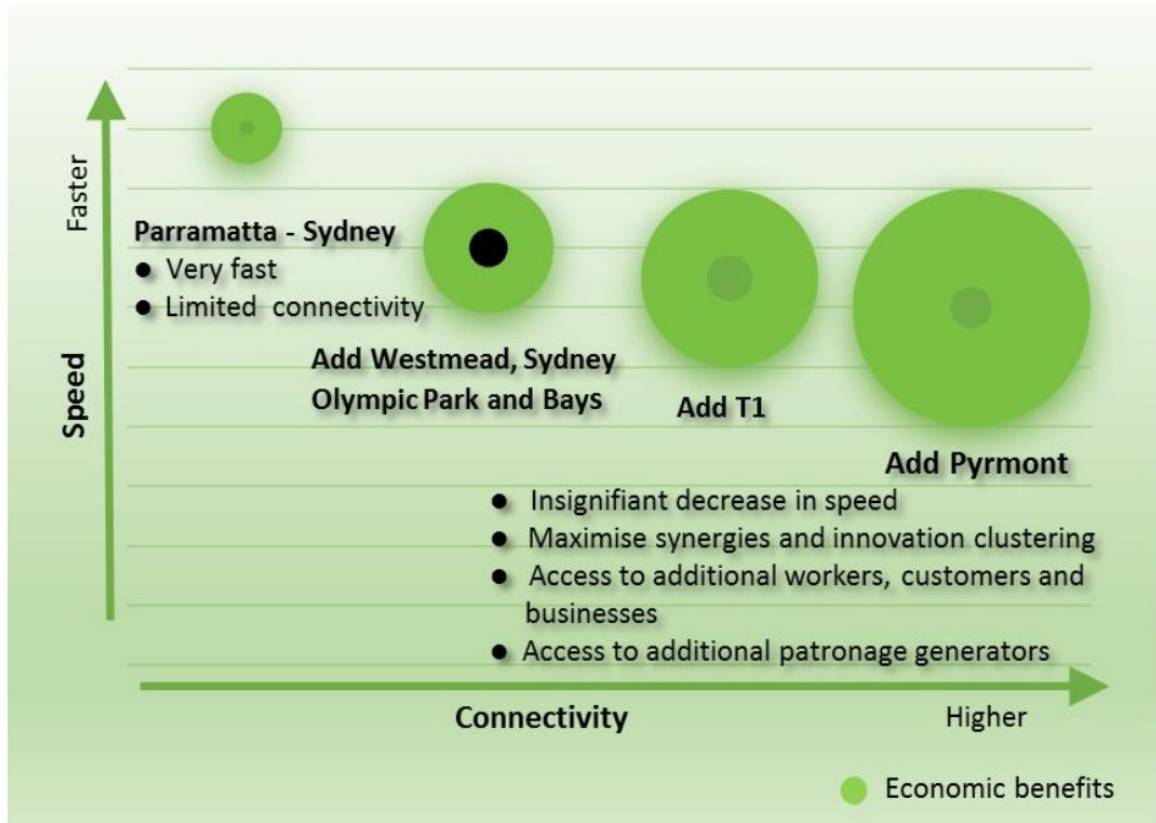


Figure 2 The travel time and connectivity / access trade off (illustrative only)

2.2. Route alignment and station selection

The City’s key issues relating to the metro route alignment and selection of station locations include:

- There was too much emphasis on travel time between the end points (Parramatta and Sydney CBDs) and not enough focus on locating stations to provide access and connectivity *along* the corridor
- There was insufficient focus on stations - including within 2-5 kilometres of both Parramatta and the Sydney city centre (a traditional global “sweet spot” for growth supported by Metro)
- There was a lack of clarity around the impacts of station selection on termination at the eastern end
- These issues are material to alignment, and station option identification and assessment
- There was insufficient consideration of network implications from a single initial terminus in terms of operational redundancy and spreading interchange across the Metro and broader rail network

Submission to the Committee on Transport and Infrastructure

- There was a lack of consideration of the potential benefits of extending the line to the southeast via Zetland
- There was insufficient consistency and clarity as to why some stations were included or not included at various milestones
- For example, the City made the case for a metro station at Pyrmont consistently from 2017 onwards. There was a risk that the proposed Metro line would pass beneath Pyrmont but not stop there until the station was finally confirmed in 2021. The City strongly supported this decision
- The planning and business case process for the alignment and stations occurred over five years, involved multiple steps, and did not always follow a readily navigable framework; and
- It failed to adequately incorporate and integrate the relevant planning strategy, place strategies and place-based transport strategies
- Made it difficult for the community to understand and support
- Meant that some aspects of the line were already at environmental impact assessment stage while some station location decisions were not yet finalised

2.3. Cause of blowouts in project costs and timelines

Project Costs

In terms of budget quantum and management, the City notes the emphasis of the Government's Independent Review of Metro on these issues and encourages collaboration between the Inquiry and the Review to maximise the benefits of investigations into this issue.

The City encourages improvements to project planning and delivery that maximise public confidence in major city shaping investment – to create the support for ongoing planning and delivery to shape Sydney's growth and change.

The City has outlined in Section 2.1 its overall position on transport infrastructure business cases, including the need to better account for benefits, which strengthens the case for more, well-located stations (a major criticism of the current Metro west, considering its extensive cost.)

Assessment of this issue should note the relatively favourable treatment of major roads such as WestConnex, which the City views as a much lower value project, and which attracted public funding.

The recent emphasis in public commentary on the Metro West project costs – and not the resulting high and long-lasting benefit stream – makes it more difficult for Government to envisage further extension. However, the City's view is that it is that very extension, to at least Zetland and with potential stations between Hunter Street and Zetland, that positions the project with the best balance between cost and early benefit.

The City believes the financial impact of Metro projects could be improved by limiting station scope (rather than the number of stations).

Value capture is widely used in other jurisdictions to support transit investment and the City encourages the Inquiry to explore its potential benefits for Metro West, especially its extension to the southeast.

Project timelines

In terms of project timelines, the City's initial 2017 submission called for Metro West between Parramatta, the Sydney city centre and Zetland, by 2028. The City does not support any slippage beyond the current 2031 commitment. The City encourages the Inquiry to focus on planning

already undertaken in order to identify the key factors in delivering Metro West (to Zetland) by 2031.

The City's experience has been that local and state government agency technical input and capacity have supported the earliest delivery of Metro West. The City suggests some factors that may have contributed to changing timelines, which arise from broad involvement in the project and commentary since 2017:

- Relationship to NSW budget forecasts - desire to limit debt and/or “smooth” infrastructure spend
- Impact of broader NSW and Australian infrastructure investment on cost and delivery – procure at the most advantageous time
- Nexus between some station options and land use/place strategies, especially with regards to Pymont Station

2.4. Ministerial consideration of consequential benefits

The City's submissions, and engagement with NSW Government agencies on project and precinct planning, consistently highlighted the full range of benefits accruing from the project, and stations such as Pymont.

2.5. Other matters

The City maintains its position on two critical aspects of Metro West, consistent with its previous submissions:

1. City should collaborate and lead on precinct planning and over-station development.

The City's 2019 submission to the SEARS for the Stage 1 EIS provided the following input:

Development immediately above and adjacent to metro stations can add to the overall number of trips, and overall productivity benefits, through careful control of land use. If each station on a metro line provides in the immediate vicinity [above and adjoining the station] facilities that are trip destinations, residents along the line can access these facilities by Metro rather than another mode.

The facilities can, over the various stations, include spaces for employment; entertainment areas, including late night entertainment; health facilities; retail facilities; and recreational facilities. Trips are contained to the metro line, which increases the number of trips and operational revenue thereby improving the viability of the line. In contrast if residential land use predominates in the immediate vicinity of stations, potential trips and the wider benefits of modal shifts are lost.

The City's consistent position is that it should have primary planning and development control over the wider station precincts. The City is best placed to plan development in these locations consistent with adopted planning strategies, maximising the project benefits while addressing any local issues.

2. Importance of extending the line to Zetland and Randwick in the short term

The City of Sydney resolved at its August 2023 meeting that the Lord Mayor write again to the NSW Premier, Treasurer, and Minister for Transport calling on the NSW Government to work with the City of Sydney to address the significant transport infrastructure deficit at Green Square by

Metro West

Submission to the Committee on Transport and Infrastructure

extending Sydney Metro West eastwards to Zetland as part of the Sydney Metro West scope as soon as possible. This resolution was in response to a detailed Minute of the Lord Mayor (**attached**).

As a result of its August 2023 resolution, the City of Sydney is investigating options for appropriate land and a construction area, including consideration of leases, stratum land sales and public domain upgrades. The aim of this is to reduce the cost of a delivering a metro station at Zetland for the NSW Government, so it can be delivered under Stage 1 of Metro West.

Extending Metro West beyond the City Centre (Hunter Street) and through innovation precincts is a key element of NSW Government planning and place-based transport strategies developed in parallel to Metro West, notably:

- Zetland and Randwick stations, and extension beyond Randwick to Malabar (TfNSW *South East Sydney Transport Strategy 2020*)
- Haymarket and Camperdown node station investigations – TfNSW *Tech Central Place Based Transport Strategy 2021*

The City has major concerns that the piecemeal approach to planning the Metro since 2017 has meant that it has failed to fully understand the constraints and opportunities of Metro between the Sydney city centre and Zetland which still has 30,000 people move in by 2036.

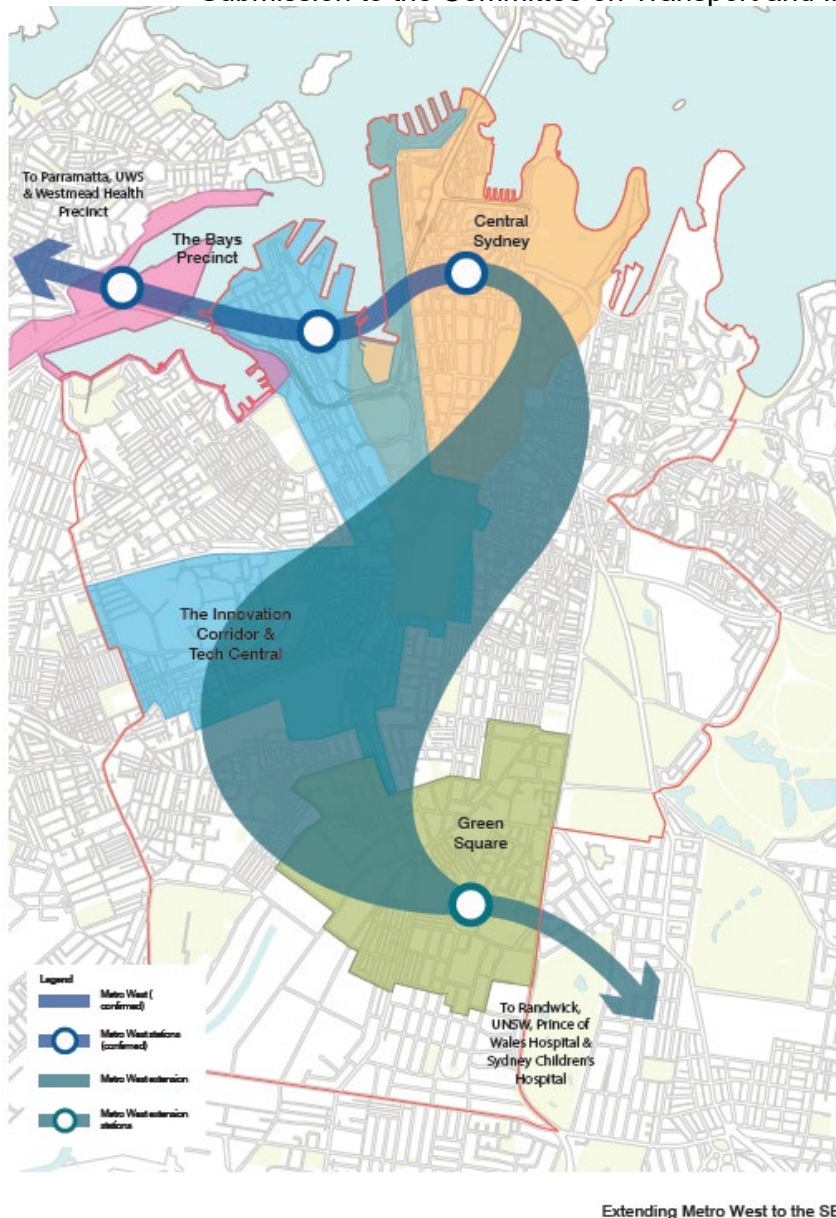
The City can find no information in the Metro planning documents that acknowledges the clear engineering need for the metro alignment to approximate a smooth S-bend between Hunter Street and Zetland.

This S-bend alignment will be needed to meet the NSW Government's own evolving definition of the project scope because the alignment is heading due east at Hunter Street, and the extension is envisaged to connect Zetland with University of New South Wales (so must approach Zetland from the west or northwest).

The S-bend alignment of the metro alignment is an important consideration feature of metro planning, and its broad scope is shown below. It aligns with Transport for NSW's announced investigation of potential stations in the Haymarket and east Camperdown nodes of Tech Central.

Metro West

Submission to the Committee on Transport and Infrastructure



Source: City of Sydney internal investigations, 2023

2.6. Attachments

- Resolution of Council 21 August 2023 - Sydney Metro West Extension to Zetland
- City of Sydney Submissions on Metro West:
 - Project Overview 2017
 - Project Overview 2018
 - Stage 1 Secretary's Environmental Assessment Requirements (SEARS) 2019
 - Concept and Stage 1 Environmental Impact Assessment 2020
 - Amendment Report and Submissions Report 2020

Resolution of Council

21 August 2023

Item 3.3

Sydney Metro West Extension to Zetland

Minute by the Lord Mayor

To Council:

At 278 hectares, Green Square is Australia's largest urban renewal project with a redevelopment cost of \$22 billion at its completion. By 2036, it will have approximately 63,000 residents and up to 22,000 workers – a density of around 22,600 people per square kilometre or 226 per hectare, among the highest densities in Australia for a renewal area of this size. Around 33,000 residents – more than half of the total population - has already moved in.

However, when the City took control in 2006, the Town Centre was virtually moribund. The industrial land was heavily contaminated and significantly affected by flooding.

Along with master planning, we have been delivering on a \$1.8 billion local infrastructure plan for services and facilities – roads and footpaths, new parks and playgrounds, public art and childcare, as well as funding more than half of the \$140 million, 2.5-kilometre stormwater trunk drain, which was the responsibility of the NSW Government. The City has already funded \$700 million to ensure local community infrastructure is in place as residents move in.

However, despite increasing the population density at Green Square being the policy of successive NSW Governments since 1995 and reaping billions in stamp duty windfall gains, they have been slow to meet their state infrastructure responsibilities.

Investment in mass transit at a major growth centre at Zetland is long overdue. This would help reduce congestion, manage current capacity problems and encourage more public transport use in the future.

The former NSW Government explored extending the Sydney Metro West to Zetland by 2031, as part of initial plans for Stage 1 Metro West. However, as project costs soared, a connection to Zetland was dropped. It was later envisaged as an eastern extension under the NSW Government's South East Transport Strategy 2022 by 2041, but it cannot wait until then.

I made it clear to the previous government that Sydney Metro West, continued out to Zetland, is essential and must be delivered as soon as possible. I have, again, raised the urgency of mass transit solutions to Green Square such as the Metro in recent letters to, and meetings with, the new NSW Premier, Treasurer, Minister for Transport and Minister for Planning and Public Spaces.

I welcome the NSW Government's Independent Review Interim Report into the Sydney Metro project, which recommends consideration of a further eastern extension to Sydney Metro West.

The City's long-term strategic plan, Sustainable Sydney 2030- 2050: Continuing the Vision, responds to the NSW Government's South East Sydney Transport Strategy 2020 and envisages future stations around the University of NSW, Prince of Wales Hospital and Sydney Children's hospital to better connect current and future innovation, knowledge and employment centres, helping to foster innovation precincts and space for the jobs of the future.

Such an extension would also take more cars off the road and help to transform key major city gateways such as Oxford Street, Botany Road, and Broadway, currently acting as traffic sewers, into green, pedestrian and cycling friendly avenues – making them welcoming entries to the city centre.

For years, the City has worked with developers to preserve Zetland Avenue as a transport corridor. That would not only accommodate a Green Square light rail connection to central Sydney, but also presents an excellent opportunity for a metro stop. Zetland Avenue is appropriately sized to fit a metro station, on an axis with a useful alignment eastwards to Randwick and beyond.

Infrastructure like the Sydney Harbour Bridge or Opera House was expensive at the time of construction, and people had their doubts. But leaders must look beyond what is hard in the moment and build what is needed for future communities.

New metro stations such as Zetland are an overdue, necessary correction so I was pleased to read recent media reports that the NSW Government is now seriously considering a metro stop at Zetland.

The City of Sydney is prepared to work with the NSW Government to identify appropriate land and a construction area including consideration of leases, stratum land sales and public domain upgrades to reduce the cost of a delivering a metro station at Zetland for the NSW Government to be delivered as part of the Sydney Metro West scope as soon as possible.

COUNCILLOR CLOVER MOORE AO

Lord Mayor

Moved by the Chair (the Lord Mayor), seconded by Councillor Chan –

It is resolved that:

(A) Council note:

- (i) by 2036, Green Square will have approximately 63,000 residents and up to 22,000 workers - a density of around 22,600 people per square kilometre or 226 per hectare, among the highest densities in Australia for an area of this size;
- (ii) the City of Sydney is meeting its public infrastructure obligations with a \$1.8 billion local infrastructure plan for services and facilities, with \$700 million already funded to ensure community infrastructure is in place as residents move in;
- (iii) the former NSW Government explored extending Sydney Metro West to Zetland by 2031, as part of plans for Stage 1 Metro West, but it was dropped;
- (iv) the NSW Government's South East Transport Strategy 2020 envisages a metro stop at Zetland by 2041, but it cannot wait until then;
- (v) an eastern extension to Sydney Metro West including a stop at Zetland (Green Square) is one of the future transformative projects outlined in Sustainable Sydney 2030- 2050: Continuing the Vision; and
- (vi) that the Lord Mayor raised the urgency of mass transit solutions to Green Square including metro in recent letters to and meetings with the new NSW Premier, Treasurer, Minister for Transport and Minister for Planning and Public Spaces;

(B) the Chief Executive Officer be requested to investigate options for appropriate land and a construction area, including consideration of leases, stratum land sales and public domain upgrades, to reduce the cost of a delivering a metro station at Zetland for the NSW Government to be delivered under Stage 1 of Sydney Metro West, and report back to Council on the outcome of those investigations and next steps via the CEO Update; and

(C) the Lord Mayor be requested to write again to the NSW Premier, Treasurer, and Minister for Transport with a copy of this Lord Mayoral Minute and calling on the NSW Government to work with the City of Sydney to address the significant transport infrastructure deficit at Green Square by extending Sydney Metro West eastwards to Zetland as part of the Sydney Metro West scope as soon as possible.

Carried unanimously.

S051491

Sydney Metro West Project Overview August 2017

City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

City of Sydney Submission to Transport for New South Wales

Contents

Executive Summary	2
Corridor Proposal	3
Project Governance	3
Pymont and Ultimo Stations	3
Central Station	5
Green Square East Station	5
Beyond Parramatta to Green Square	6

Executive Summary

The City is supportive of new investment in public transport, the development of a metro network for Sydney and the concept of Sydney Metro West.

The design and implementation of Sydney Metro West will have major implications for local economies, development and management of transport demand in the City of Sydney. The City of Sydney would like to work with Transport for New South Wales to scope and develop the project to support Sydney's role and standing as a Global City and the continued economic performance of Central Sydney to the State economy.

To maximise the benefits of Sydney West Metro, the City recommends:

- Central Station (Railway Square location) be used as the Sydney West Metro Station to service the CBD and connect into the wider transport network;
- Three new stations should be located within the City of Sydney Local Government area at Pyrmont and Ultimo to service and foster new jobs growth on the edge of the CBD and at Green Square East to service one of the largest urban precinct area in Australia. The expanded Sydney Metro West would provide direct connections between Parramatta, Olympic Park, the Bays Precinct, Sydney's current and future CBD and Green Square.
- The model for over-station development be developed to maximise the economic development benefits instead of the return on land through purely residential development.

The City will further consider the Sydney West Metro Project as it develops and resolves these design issues.

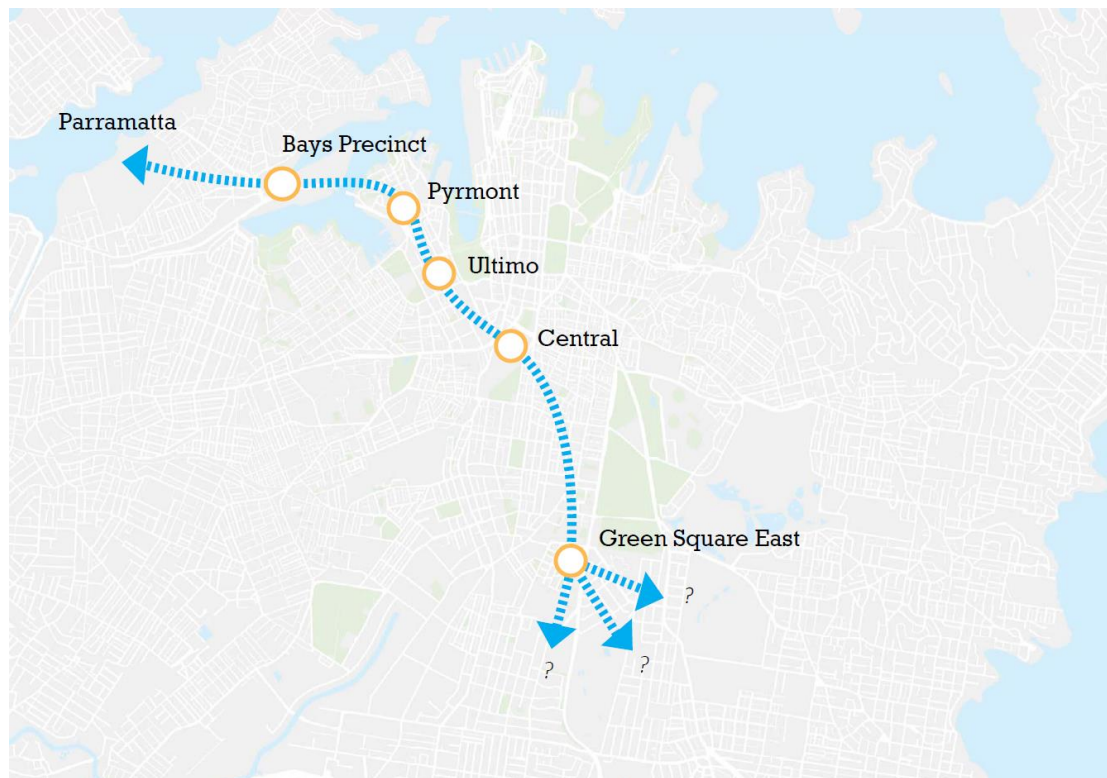


Figure 1: City of Sydney proposal for Sydney Metro West

Corridor Proposal

The Central Sydney Planning Strategy identifies a strategic direction for employment growth that builds on economic strengths within a poly-centric metropolitan region. The Strategy details the importance of the economy within central Sydney, and the importance of adjoining areas including the Bays Precinct, Central to Eveleigh and Ultimo.

The City of Sydney's Sydney Metro West proposal will connect these centres, boosting capacity between Sydney and Parramatta – to the benefit of both centres and their broader Districts – and serve residential and commercial growth in Green Square and beyond.

Stations at the Bays Precinct, Pyrmont and Ultimo will provide for the expansion of the CBD to the west. Central Station will provide an interchange point to connect to the wider network and a station at Green Square East will provide additional public transport capacity for growing communities in central Sydney.

The project will increase capacity on the existing heavy rail network by providing fast, efficient transport to alternate locations. This will particularly ease congestion on the Western Line to Parramatta and the Airport Line, providing additional capacity and resilience to the system.

There are two potential models for over station development along the corridor.

1. Maximise return on land – presently this is via residential development
2. Maximise overall project benefits – developing land use attractors

While the first option provides the opportunity for the greater (short term) return on investment, the second option provides for the greater long term benefits of the line.

Opportunities to create new centres along the corridor will provide reasons for the station to provide a destination as well as an origin. This will ensure turnover of patrons through the network, providing greater use of the line and more efficiency in each of the services.

The stations proposed within the City of Sydney area provide opportunities for either approach to be adopted. The City would have a strong preference for the over station development to lead by example and provide non-residential uses for the growth of new centres.

Project Governance

The City of Sydney is a significant stakeholder and can provide significant value through our extensive local knowledge and insight into this project. The ongoing economic performance of Central Sydney is of great significance to the New South Wales and Australian economies. As such it is important the City is involved in assessing options and design development for the project from a place-making, economic and urban design perspective, as well as a transport planning one.

Pyrmont and Ultimo Stations

Stations in Pyrmont and Ultimo will allow for the future growth of the CBD and its expansion west to the Ultimo Pyrmont peninsula as well as improved connectivity between the CBD and the new precinct emerging at the Bays.

This is a long term proposition looking beyond the City's *Central Sydney Planning Strategy*. Sydney Metro West would provide opportunities for the continued growth of the CBD over the next 50 years.

Expansion of CBD and jobs growth

Using State Government (Transport Performance and Analytics) figures, which align with the draft *Central District Plan*, the Bays Precinct, Pyrmont, Ultimo and Sydney University (Education and Health) Precincts baseline jobs growth is forecast to increase by 32,000 to 2036, and 50,000 to 2051.

The additional jobs breakdown is as follows:

Precinct	Jobs (2036)
Bays Precinct (excl. Fish Markets)	10,000
Pyrmont & Fish Markets	6,000
Ultimo	3,000
Sydney University health & education	13,000

An aspirational target of an additional 70,000 jobs is also identified for Sydney City.

The draft Central District Plan defines Sydney City as: The Bays Precinct; Pyrmont; Darling Harbour; Barangaroo; Sydney CBD; Camperdown-Ultimo health & education; Central to Eveleigh; Surry Hills and Sydney East.

As Sydney East and Surry Hills are heavily constrained, the vast majority of jobs growth will need to be delivered in the other precincts. The CBD, Central to Eveleigh and Barangaroo, will be well serviced by public transport with current and planned projects. However, effective and efficient public transport is required for the Bays, Pyrmont and Ultimo areas.

Need for two stops

Economic activity on the Pyrmont Ultimo peninsula is distributed to the north and the south. Media, communications, arts and recreation and tourism sectors occupy Pyrmont while education and innovation industries are clustering in Ultimo to the south. A single station would leave parts of the peninsula without improved public transport access, missing an opportunity to connect renewal of the Bays Precinct, White Bay, innovation clusters in Surry Hills and Chippendale and the Central Station precinct.

Land use opportunities

Fostering job growth based on existing industry clusters is vitally important in the expansion of Sydney's economy. Beyond Central Sydney's traditional boundaries, clusters of industry hubs - the creative industry, the growing health and education sectors and the booming technology – are forming at its edges. These hubs take advantage of proximity to the CBD and excellent connectivity to the wider Sydney Metropolitan area as well as access to more affordable office rents and spaces that can adapt to their growth needs. Many of these businesses will shape the profile of Sydney City's future employment. Proximity is key, and fast reliable public transport is fundamental.

The Central Sydney Planning Strategy's structure plan identifies part of Ultimo as an area for future urban intensification. While detailed urban design analysis is required, this area is least constrained by sun access and has the potential for a tower cluster. Where increased heights and floor space can be delivered in response to increases in public transport capacity.

Smart planning is needed for growth that is integrated with planned increases in public transport capacity and delivery of the right mix of commercial, retail and hotel uses. Additional floor space must also be supported by adequate social and physical infrastructure, and other activities that support a liveable city.

The Bays Precinct offers an opportunity to assist Sydney City in meeting its employment projections to 2036 and more importantly beyond, with close proximity to an established digital economy hub in Pyrmont and Ultimo, and top academic and health institutions in Camperdown-Ultimo.

Central Station

Metro West interchanging at Central (in the vicinity of Railway Square) will allow easy access to the existing public transport network, including Sydney City and Southwest Metro (currently under construction), Sydney's regional bus network, both of Sydney City light rail lines and the heavy rail network.

Linking the two Metro lines at Central will provide the first stages to a networked Metro solution for Sydney. Future additional Metro lines connecting to existing stations on either line will provide easy access to the whole network due to the turn up and go service provided by Metro.

This provides greater access to employment for residents across Sydney. For example a resident in Campbelltown will have to make one change to access either Bays Precinct or Pyrmont.

Green Square East Station

As identified by Infrastructure Australia, Green Square is a blue chip location between Sydney CBD, the Airport, Sydney University and the University of New South Wales. A station at Green Square East will provide this growing area with the transport connections and capacity it currently needs to help it to continue to thrive and deliver on its potential. Connecting Green Square residents and employers with a wide network further boost this already successful precinct.

Green Square was identified as a major urban renewal area in 1995 to provide homes and jobs along the City Centre to airport corridor. Green Square covers about 280 hectares and it is already one of the most densely populated areas in Sydney. From the 3000 people living in Green Square in 1999, the population has grown to 25,000 people in 2016. This is not even half of the 61,000 residents projected by 2030.

Green Square has significant transport issues now. With so many people moving into the area and many more visiting for work and leisure, the existing public transport network is severely challenged. Congestion is already a major problem which will only increase with the WestConnex road project.

Green Square East will provide Green Square with additional capacity on the Airport Line, a new Metro station in this location as well walking links to City and Southwest Metro at Waterloo, and CSLER at Devonshire Street.

A metro station in this large precinct allows for a balanced distribution of patronage allowing greater flexibility in the three corridors that feed those stations, minimising displacement downstream.

The eastern parts of Green Square is where most of the residential development is occurring, together with significant retail centres, such as Danks Street and East Village. These precincts are beyond the 10 minute walking catchment of the Green Square train station, and are currently reliant on buses.



Figure 2: Artists impression of possible Green Square East station entrance

Whilst additional off-peak rail services provided on the Airport line and any additional shoulder bus services can address some of the public transport demand, they will not address the fundamental peak period capacity constraints.


Unless transport demand generated by Green Square's development is concentrated around high capacity public transport infrastructure, the road traffic generated will severely further congest key strategic corridors. These include corridors linking the City Centre to the airport, freight corridors to Port Botany and key east-west corridors between the medical, educational and population concentrations in the inner west and south-eastern suburbs.

Beyond Parramatta to Green Square

Metro West has a number of possible additional destinations. Opportunities to connect onwards to Randwick Education and Health Precinct, Maroubra and/or Badgerys Creek are all options which would be available for consideration. Any extension beyond this not compromise the projects intended outcomes.

Badgerys Creek Airport

Continuing to Badgerys Creek to service the new airport would provide one Metro line connecting the Greater Sydney Commission's three Cities.



An airport line may propose the use of a tailored rolling stock, providing luggage racks and other facilities. Given the line would be approximately 50km to Central additional seating could also be required. These do not fit with the Metro connection required from Parramatta to Green Square. This is an important consideration in developing the Metro product to balance these competing opportunities.

University of New South Wales and Randwick Health Precinct

Metro West provides a great opportunity to provide a connection between Green Square, UNSW and UTS. The student population in Green Square and the agglomeration benefits makes this a great transport link. If this can't be achieved by this Metro, a surface light rail solution should play the connectivity role to broaden the network, and link these knowledge hubs with their students.

Sydney Metro West Project Overview

City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

City of Sydney Submission



Sydney2030/**Green/Global/Connected**
city of villages

CITY OF SYDNEY  

Contents

Executive Summary	2
1. Metro West to support the Region Plan	4
2. Connecting GPOP to the Harbour CBD	5
3. Connecting places and achieving travel times	6
4. Station locations in the City of Sydney	8
4.1. Pyrmont	8
4.2. Sydney City Centre North	10
4.3. Central Station	10
4.4. Redfern East	10
4.5. Green Square (Zetland)	11
4.6. Other potential station locations	12
5. Station and precinct planning	13
5.1. Discrete station entries	13
5.2. Over station development	13

Executive Summary

The City supports Sydney Metro West and is working closely with Transport for NSW to identify options to deliver more integrated transport and land use outcomes for the benefit of metropolitan Sydney.

The City supports the development of a network of metro rail lines to serve the future transport and access needs of Sydney. The City acknowledges that the State Government has funded and started construction of *Sydney Metro City and South West*.

The City supports the broad *Sydney Metro West* concept outlined in the Project Overview and notes that *Metro West* is in the planning phase and is currently unfunded. .

It supports *accelerated* rollout of an *extended* Sydney Metro West Stage 1 to deliver sustained economic and social benefits, that is:


- Metro West should be delivered no later than 2028 to improve access of labour to jobs in the Harbour CBD to further drive jobs growth and innovation
- Stage 1 should extend to Zetland to address pressing and worsening congestion in the Green Square urban renewal area.

Station location and spacing

The City supports appropriate station location and spacing that is consistent with global application of metro rail technology. The City supports the Project Overview's statement that "*the need for fast metro rail will be balanced with delivering improved community benefits*".

In terms of the Project Overview's broad corridor between Parramatta, the Olympic Peninsula and Sydney's City Centre, the City:

- notes that the metro service and station development and locations being discussed are likely to achieve a transformative **20-25 minute travel time** between the two cities, while connecting each to new innovation clusters.
- strongly supports a station at **Pymont** to support the Bays Precinct by integrating into an expanded "Harbour CBD" as outlined in the District Plan. The station would also provide direct access to major destinations, and provides resilience and redundancy in the system for City Centre stations. Additional over station development in this location is not supported.
- supports a station in the established northern part of **Sydney's City Centre** with opportunities to create a major interchange precinct.
- supports a station at **Central** to help renew the southern Sydney CBD and building on the established education precinct.
- strongly advocates that the first stage of Metro West extends at least as far as **Zetland**. This would bring forward solutions to the pressing and worsening transport issues affecting the Green Square area and meet the timeframes outlined by Infrastructure Australia for addressing this national investment priority. Additional over station development in this location is not supported.
- suggests that stations between Central and Zetland should be investigated, for their potential to serve current and future development.



The City notes that the NSW Government has no public plans for connecting the major health and innovations precincts of Camperdown, Sydney University and Ultimo to the rail network. The City outlined the benefits of a Metro station supporting these precincts in its 2015 submission on the development of Sydney Metro City and SouthWest. The City is now suggesting that TfNSW identify alignments for Metro West to consider, that could deliver stations to serve these precincts. This would strengthen the contribution of productivity benefits to the business case, albeit at higher initial cost.

Station design

Station entries need to be discrete and provide multiple access points.

To optimise local outcomes and acceptance, we suggest that over-station development in the CBD including Central should be administered by the City of Sydney and the Central Sydney Planning Committee.

1. Metro West to support the Region Plan

The City supports the Greater Sydney Region Plan A City of Three Metropolises.

Sydney Metro West will best support the Plan by linking strategic centres, promoting the growth of innovation and start-up industries and maximising interactions between health and education clusters. This connectivity will rely on Metro serving strategically located intermediate stations to support key stations outlined in the Project Overview.

This submission focuses on the Region Plan's spatial elements of 'Jobs' and 'Connectivity'.

The most successful global cities are poly-centric, with efficient flows of people, trade, ideas and capital – these flows contribute to productivity, liveability and sustainability. Enhanced mass transit connections between existing and future job centres is likely to increase future economic, environmental and social resilience.

Connecting the western and eastern economic corridors with high quality, rapid transit sets the platform for the future. But connecting the highly educated labour markets within the corridors, and in between, is the key to maximising the significant liveability, productivity and sustainability benefits.

This Submission addresses the issues relevant to this approach:

- The benefits of a new, improved corridor between Greater Parramatta and Olympic Peninsula (GPOP), and the Harbour CBD
- The right balance to developing a metro, considering end to end travel times, and connectivity along the corridor (provided by strategically located stations)
- The importance of connecting the right innovation centres along that corridor including Pyrmont / Ultimo, Sydney CBD Central Station and Zetland (and eventually to the South-East).
- Appropriate approaches for development over stations and in station precincts.

2. Connecting GPOP to the Harbour CBD

The City supports the application of metro rail technology to create a new Metro West link between the Central River and Eastern Harbour Cities outlined in the Region Plan.

Sydney Metro West will provide a mass transit service linking Greater Parramatta and Olympic Peninsula (GPOP) and the Eastern Economic Corridor to help drive GPOP's improved liveability and productivity. These connections are shown at Figure 1. With stations strategically located, Sydney Metro West will maximise economic productivity and employment growth.

Currently Parramatta has good transport services to Central Sydney. Sydney Metro West needs to unlock housing supply and employment growth in the corridor along its alignment, increasing the areas within a 15-20 minute public transport trip of both Parramatta and Central Sydney.

The initial stage of Sydney Metro West should extend to Zetland. This will connect the series of innovation and health clusters, extending as far as Westmead in the Central River City, to the Green Square area. As well as being a key source of skilled workers, Green Square is also perfectly located to be the commercial, residential and tourist gateway to Sydney's international Port and Airport.

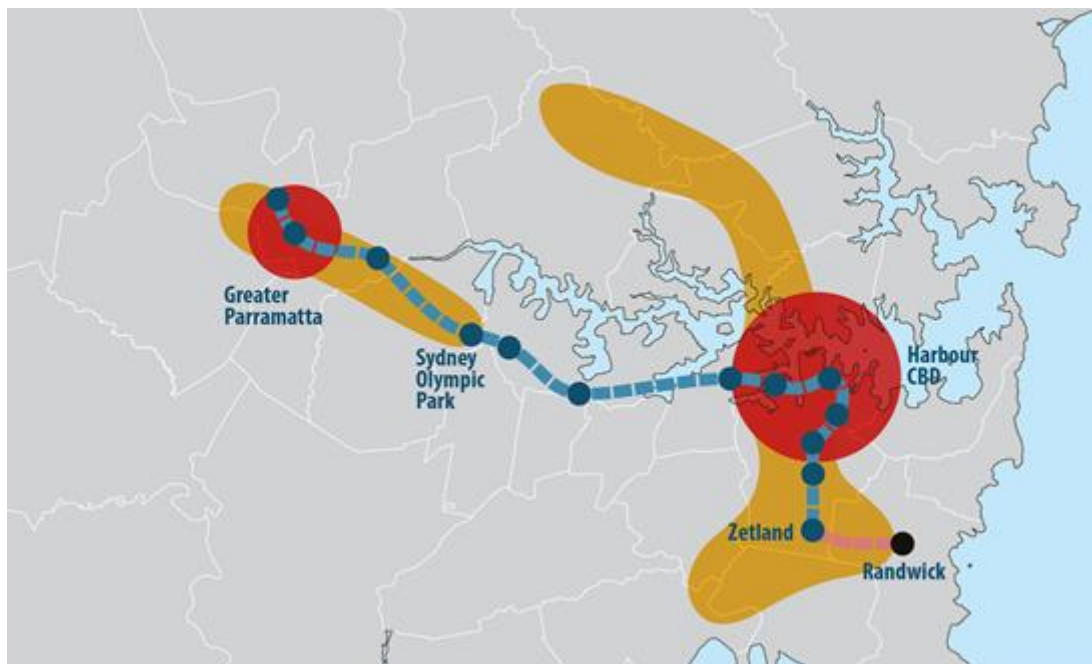


Figure 1 How Metro West connects GPOP to the Eastern Economic Corridor

Accelerating Sydney Metro West for delivery no later than 2028 will help achieve the NSW Government's target of 1 million more jobs in NSW by 2036 (Jobs for the Future, August 2016).

3. Connecting places and achieving travel times

The metro must deliver a service that achieves an appropriate balance of connectivity and travel times. Connectivity relies on providing stations in appropriate locations to enable customers to access the benefits of the metro system.

The opportunity to support new industry clusters as well as more housing and employment must not be undermined by over-emphasis in planning on travel times between the end points of the alignment.

The City supports strategic station location and spacing that is consistent with global application of metro rail technology. The best metros are more than just people movers from one end to the other. Metros are generally planned with station locations and spacings that deliver strong passenger flows in both directions throughout the day and week – it is in those environments that the technical advantages of metro systems, such as rapid acceleration, are most advantageous.

The City supports the Project Overview's statement that *"the need for fast metro rail will be balanced with delivering improved community benefits"*.

The City understands the potential benefits for GPOP of reduced travel times between Parramatta and the Harbour CBD. The proposed Metro West is likely to achieve a travel time in the 20-25 minute range, compared to current 31-33 minutes for Sydney Trains' services.

It would also offer very rapid travel times between Parramatta and important centres like Sydney Olympic Park and Bays Precinct.

Metro West would also offer legible services at higher frequencies. It would use brand new rolling stock, on highly reliable new track, stopping at brand new, completely accessible and safe, well-located stations.

In combination, metro would deliver a vastly superior transport service than current rail lines and has the potential to improve public transport access to many strategic locations.

In addition, the City is of the view that the addition of a small number of well-located intermediate stops will increase benefits for Parramatta, rather than diminishing benefits by marginally increasing travel times. Higher connectivity with more stations will increase the benefits of the 30 minute city for those who live and work along the corridor.

The likely trade-off between travel times and connectivity is illustrated at Figure 2, which shows that:

- Adding additional stations significantly increases access and connectivity (which moves the point further right in the graph)
- This results in only minor decreases in overall travel speed (which moves the circles lower in the graph)
- These increases in access and connectivity results in higher economic benefits (shown by the size of the circles)

Overall, it shows that the right amount of connections (stations in the right places) maximises rather than reduces overall economic benefit.

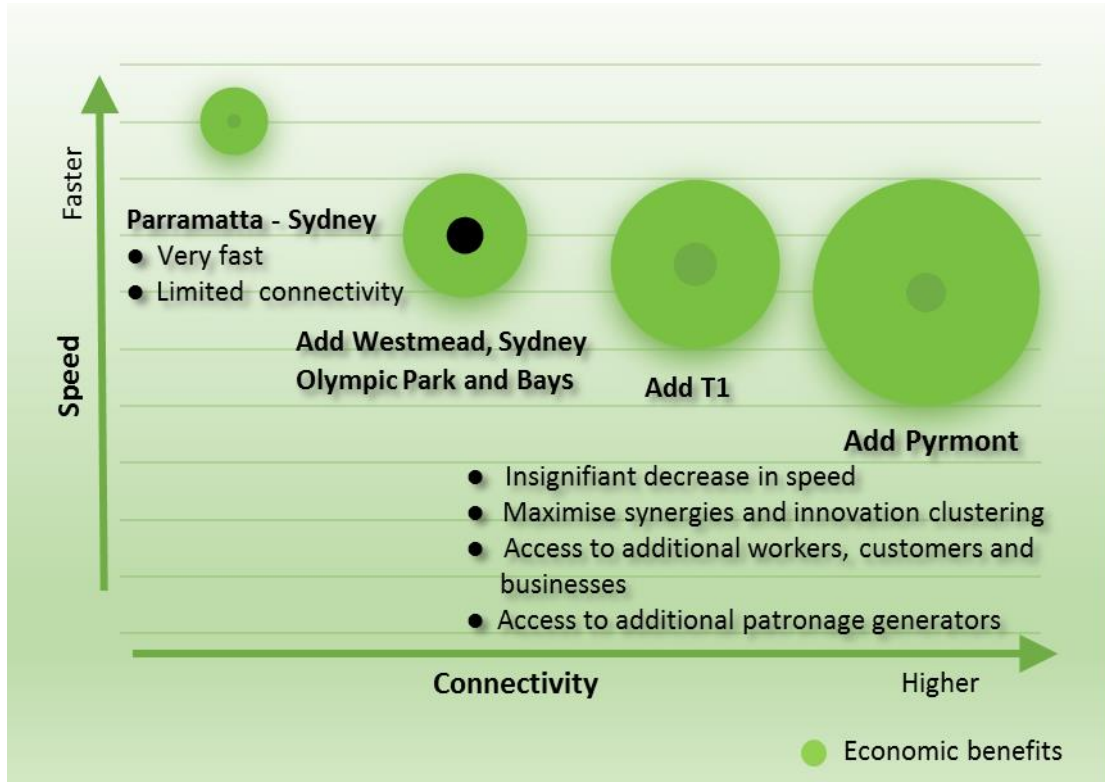


Figure 2 The travel time and connectivity / access trade off (illustrative only)

4. Station locations in the City of Sydney

The City supports a number of potential station locations within our LGA along the broad corridor outlined in the Project Overview, shown at Figure 3.

These locations respond to:

- Current and future employment and housing
- Appropriate station spacing and locations for a metro route
- Transport system capacity constraints
- The Metro system requirement for an appropriate location for a turn back facility
- Opportunities to grow a more connected transport network.

Figure 3 shows stations on the Overview's broad alignment that the City considers essential (solid circles) and those on which the City is encouraging discussion (dotted circles).

4.1. Pyrmont

The Eastern City District Plan shows Pyrmont at the heart of the Harbour CBD and as a pivotal location in the Innovation Corridor of medical, education and innovation sectors around Ultimo, Camperdown and Chippendale.

A station serving Pyrmont (and Ultimo) connects it to the Bays and the City Centre, maximising the Greater Sydney Commission's future vision of the expanded Sydney CBD.

The expanded Harbour CBD takes in Pyrmont, Ultimo, Darling Harbour and The Bays Precinct and by 2036 Pyrmont will be home to over 33,000 jobs. Key strategic planning drivers for providing a station include:

- Pyrmont currently has the highest square kilometre population density in Australia with a skilled information and communications technology (ICT) workforce
- Nine of the eleven NSW Government priority employment sectors are in and around Pyrmont, representing the largest ICT labour market along the Sydney Metro West alignment
- The Bays will rely on high levels of connectivity to the Harbour CBD and a station at Pyrmont would ensure easy and convenient access providing continuous employment corridor and co-location benefits
- It would support successful redevelopment at The Bays Market District by providing walk-to access to the Metro system.

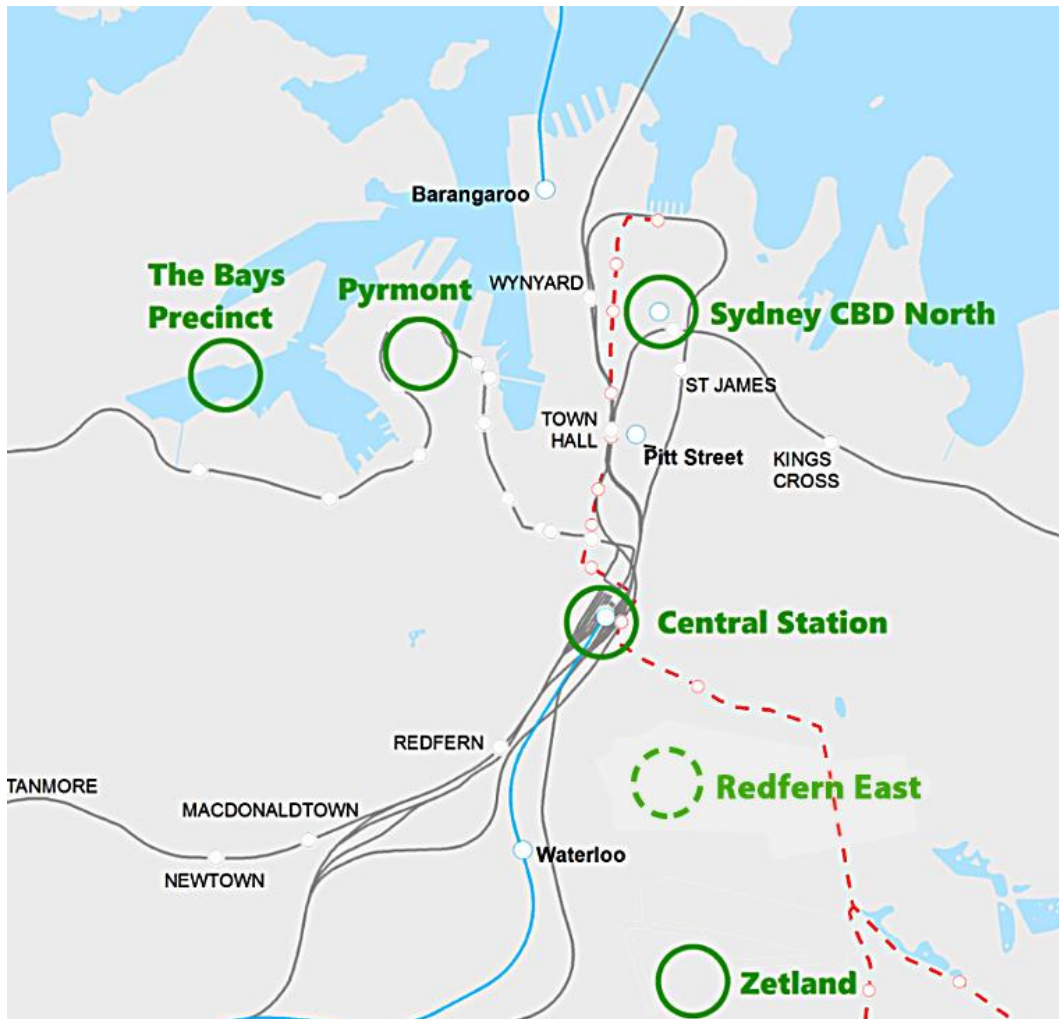


Figure 3 Proposed Metro West stations in the City of Sydney (source: City of Sydney)

A Pyrmont station would have local access and transport benefits including:

- Creating round-the-clock patronage to visitor destinations such as Sydney Fish Markets, ICC Sydney and Star City. This would contribute to relieving congestion (such as from tour coaches) and conflict between local and regional traffic
- Servicing areas of Ultimo if a station is not provided there
- Relieving overcrowding at CBD stations (Sydney Trains and Metro) during peak periods and events in the City Centre and Darling Harbour such as New Years Eve and Vivid
- Providing interchange with the Inner West Light Rail, relieving overcrowding for trips to and from Pyrmont
- Building redundancy into to the Metro system if there are issues that cause the closure of either Bays or City Centre North stations.

The City does not support any additional over station development at Pyrmont due to significant densities in this location. The metro development is only supported to meet existing transport requirements and future Bays Market District demand.

4.2. Sydney City Centre North

The City supports a station in the north of the Sydney City Centre.

The northern part of Sydney City Centre is one of the highest density CBDs in the world and with further employment intended by the draft Central Sydney Planning Strategy, a CBD north station with multi-modal interchanges will be crucial.

A Metro Station at City Centre North would provide a major interchange precinct connecting:

- Barangaroo ferry wharf and Wynyard Walk
- Heavy rail services at Wynyard, Martin Place, and St James, thus allowing access to trains serving the West, North, the East and South, including Kingsford Smith Airport
- North and South West metro
- City and South East Light Rail
- Buses on York, Castlereagh and Elizabeth Streets
- Kent Street and future Pitt Street bicycle links.
- Over-station development opportunity

This station would relieve overcrowded Wynyard and Circular Quay stations during peak periods and events.

4.3. Central Station

By 2036, Central Station and its surrounds will be home to at least 196,000 jobs and 72,000 residents.

A station at Central Station would provide a further catalyst for employment and economic growth including development above the station.

If no stations are located in the health and innovation districts at Ultimo and Camperdown/Sydney University (see Section 4.6), interchange to a Metro West station at Central is the most appropriate approach to linking those precincts to health and innovation clusters such as Westmead, Bays Precinct and eventually Randwick. That connection will also link them to the identified housing markets in Inner West and Canada Bay Councils.

A station at Central would provide connection between urban and regional rail services, expanding the catchment area of people who can access regional transport.

It would also create a multi-modal interchange including all Sydney train lines, both metro lines, Inner West and South East light rails and buses to the inner west, south and south-east.

Central Walk is pivotal to the efficiency of this interchange function.

4.4. Redfern East

Redfern East is well located close to a diversity of jobs as well as a high level of amenity and services. The delivery of a metro station in this location will accelerate the delivery and increases certainty of over 70,000 jobs and more than 65,000 residents by 2030. By way of comparison Sydney Olympic Park is forecast to provide 34,000 jobs and more than 23,000 residents by 2030. An increasing threat to the

area's liveability and productivity is increasing congestion between Redfern, Green Square and the City. Other substantial benefits include:

- Supports the sustainable redevelopment of the Redfern Estate as a mixed-use precinct
- Increases public transport access to visitor destination Redfern Park and the surrounding precinct.
- Increases direct access between GPOP and the business, arts and creative services in Redfern
- Increases Greater Sydney's access to the highest concentration of Aboriginal and Torres Strait islander support services in NSW
- Reinforces the character of Redfern
- More street space for people walking and cycling
- Less conflict between local/regional traffic
- Provides relief to overcrowded Redfern station, and can provide accessible environment
- Relieves overcrowding of overcapacity bus network
- Limited over station development

4.5. Green Square (Zetland)

To be truly congestion busting for both rail and roads, a Sydney Metro West station is needed at Zetland-Green Square.

This will address major transport issues already present in the fast-developing area as well as responding to the national priority for transport solutions in this corridor, identified by Infrastructure Australia.

Zetland has advantages as a terminus, with good potential to construct by open cut turn backs for Stage 1 of Metro West. If the initial stage extends to Zetland it enables a future extension to the South East.

Zetland and the broader Green Square area will be home to over 61,000 residents and will become the highest square kilometre population density in Australia.

The Eastern District City Plan states half of greater Sydney's jobs are generated in strategic centres. It identifies Green Square-Mascot Strategic Centre as a major location in the Eastern Economic Corridor:

- It is a key source of skilled workers
- Being located between the Harbour CBD and the Port and Airport, it is perfectly located to be their commercial, residential and tourist gateway
- It is also located between the Universities of New South Wales and Sydney.

A station near Green Square would ensure employment targets can be met, and provide greater certainty around residential development.

Western Sydney would have direct access to a growing and educated labour market and increased access to existing logistic and manufacturing clusters.

Without transport infrastructure improvements around Australia's highest GDP earning trade gateway, road congestion will diminish productivity. Infrastructure

Australia has responded to this by denoting investment in this corridor as a High Priority Initiative in the 5-10 year horizon.

A station would provide long-term relief for the overcrowded Green Square station. There will be significant relief for bus networks, and opportunities to feed bus-metro interchange.

The City does not support any additional over station development in the Green Square area in Zetland.

4.6. Other potential station locations

The City reinforces its support for the Project Overview's statement that "*the need for fast metro rail will be balanced with delivering improved community benefits*"

The State Government should investigate additional stations for their potential to serve current and future development. This could result in station location and spacing more consistent with global application of metro technology in dense cities.

Additional stations could be provided in the City Centre, but also between Central and Zetland. Specific station locations depend on the final alignment.

The City notes that the NSW Government has no public plans for connecting the major health and innovations precincts of Camperdown, Sydney University and Ultimo to the rail network. The City outlined the benefits of a Metro station supporting these precincts in its 2015 submission on the development of Sydney Metro City and SouthWest. Benefits would also extend to residents of nearby suburbs, such as Forest Lodge and Glebe.

The City is now suggesting that TfNSW identify alignments for Metro West to consider, that could deliver stations to serve these precincts.

Stations in these precincts would strengthen the contribution of productivity benefits to the business case, albeit at higher initial cost. Metro West would connect Westmead and Parramatta via Sydney Olympic Park and Bays, to the City Centre, then to Zetland via the Camperdown/Sydney University/Ultimo health and innovation precincts. The subsequent stage of Metro West would then connect all of these places to the Randwick/University of New South Wales health and innovation precinct.

5. Station and precinct planning

5.1. Discrete station entries

As well as being an easy part of the daily journey, station entries should be discrete and legible. In dense urban areas station entries are important places of orientation and they need to be visible with multiple access points. Unnecessarily large entries undermine the productive potential of these places.

The City recommends that workshops be held with the project team to exchange information and discuss strategies for implementing entries appropriate for dense city areas.

5.2. Over station development

The City does not support any over station development at Pyrmont or Zetland due to significant densities in both locations. In this regard, the metro development is supported in Pyrmont and Zetland to meet existing transport requirements.

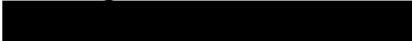
Future over station development in the Central Sydney (CBD) should be administered by the City of Sydney with the Central Sydney Planning Committee as the consent authority using an established and proven planning pathway for design excellence. It has a majority of State-appointed members and the City has well understood approval processes. This would ensure efficient and streamlined administration of planning functions with local conditions considered and transparency of process providing public confidence in planning decisions.

The City recommends that meetings be held with the project team and the Department of Planning to discuss strategies for future development approval processes that are required beyond the State Significant Infrastructure approval.

11 November 2019

Our Ref: 2019/565672
Your Ref: SSI-10038
File No: X010524

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


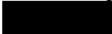
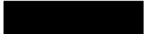

Attention: Keith Ng
By email: 

Dear Keith

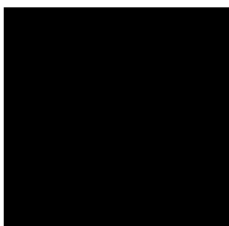
City of Sydney input into environmental assessment requirements for Sydney Metro West – SSI-10038

Thank you for the opportunity to provide comments to the Planning Secretary in the early stages of the preparation of the environmental assessment requirements (SEARs) in respect of the concept and Stage 1 of the Sydney Metro West State significant infrastructure project.

The key points that 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 
, Manager Transport Major Projects on  or at
.

Yours sincerely,



Graham Jahn AM
Director
City Planning | Development | Transport

1. Introduction

1.1. Sydney Metro West environmental assessment requirements

In accordance with section 5.16(1) of the Environmental Planning and Assessment Act 1979, the City of Sydney provides the following comments to the Planning Secretary in the preparation of the environmental assessment requirements (SEARs) in respect of the concept and Stage 1 of the Sydney Metro West State significant infrastructure project.

The City appreciates the opportunity to provide comment early in the process, and looks forward to commenting further on the SEARs once these have been prepared.

2. Overarching Issues to be considered in the SEAR's - getting the fundamentals right

2.1. The 20 minute travel time myth

Travel time is only one element of connectivity

The City supports strategic station location and spacing that is consistent with a global application of metro rail technology. The best metros are more than just people movers from one end to the other. Metros are generally planned with station locations and spacings that deliver strong passenger flows in both directions throughout the day and week – it is in those environments that the technical advantages of metro systems, such as rapid acceleration, can be fully realised.

The City understands the arguments for the potential benefits for Greater Parramatta to the Olympic Peninsula (GPOP) of reduced travel times between Parramatta and the Harbour CBD. The proposed Sydney Metro West is likely to achieve a travel time to the north of the Harbour CBD in the 20-25 minute range, compared to the current 31-33 minutes for Sydney Trains' services.

It would also offer very rapid travel times between Parramatta and important centres like Sydney Olympic Park and Bays Precinct.

The City is of the view that the addition of a small number of well-located intermediate stops will increase benefits for Parramatta, rather than diminishing benefits by marginally increasing travel times. Higher connectivity with more stations will increase the benefits of the 30 minute city for those who live and work along the corridor.

The right amount of connections (stations in the right places) maximises rather than reduces overall economic benefit.

The focus on travel times understates other benefits of the product in terms of economic development in GPOP

Even with a station at Pyrmont, Sydney Metro West will be significantly faster between GPOP and the northern end of the Harbour CBD than existing rail services.

Additionally, Sydney Metro West would also offer legible services at higher frequencies. It would use brand new rolling stock, on highly reliable new track, stopping at brand new, completely accessible and safe, well-located stations. The additional capacity that these services will deliver would attract customers from the Sydney Trains T1 Western Line as well as achieving a mode shift from private vehicles.

In combination, Sydney Metro West would deliver a vastly superior transport service than current rail lines and has the potential to improve public transport access to many strategic locations.

A misconception of the '30 Minute City' concept

NSW Government strategies *Future Transport 2056* and *The Greater Sydney Region Plan – a metropolis of three cities* share a common understanding of the '30 minute city' as:

The vision for Greater Sydney is one where people can access jobs and services in their nearest metropolitan and strategic centre within 30 minutes by public transport, seven days a week.

The Sydney Metro West Scoping Report states that a 20 minute travel time between the two cities is important to support both the '30-minute city' concept and to facilitate improved customer, transport and land use outcomes. This is a misstatement of the '30 minute city' concept.

Following the '30 minute city' concept, the stations and their spacing would ensure that the maximum number of residents would be able to reach Parramatta and/or Sydney within 30 minutes; not that the travel time between Sydney and Parramatta is about 20 minutes. For example, a station at Pymont would place Pymont residents within 30 minutes of Parramatta and more importantly, place residents along the Metro line within 30 minutes of high value jobs in Pymont. This is a stronger nexus to the '30 minute city' concept than a 20 minute travel time.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Include a reference to the '30 minute city' concept in the Greater Sydney Commissions' plans. In particular –
 - in relation to the consideration of alternatives
 - in the consideration of any additional stations, for example, Pymont
- Demonstrate the number and location of residents who will move from being beyond, to within, 30 minutes from Parramatta and, separately, Sydney
- Provide quantitative evidence of the economic benefits of 20 minute travel time, compared to (say) 15 minutes (achieved with even fewer stations) and 22 minutes (with a Pymont station)
- Quantify the importance of travel time as opposed to other rail system attributes, especially as they contribute to benefits attributed to economic development and agglomeration.

2.2 Economic assessment/business case process unsuited to a project as transformative as Sydney Metro West

Adequacy of the economic assessment/business case process

The traditional transport project business case process does not give sufficient weight to the aggregate benefits and relies on travel time saving, road safety benefits and reductions in volatile organic compounds.

Sydney Metro West is a transformational project which will affect the land use and travel patterns of a considerable area of the metropolitan area. The business case process

that has been applied was developed for localised road improvement projects and is not well suited to a project such as Sydney Metro West. Most notably, it overstates the value of small reductions in travel time and uses questionable transport modelling to inform a number of 'benefits' such as congestion relief and emission reductions.

Critically the business case process works against justifying stations for the future Sydney City Centres (e.g. Pyrmont, Ultimo/Central).

Station locations improve access and connectivity and propel land use change. The transformation of localities by the provision, or non-provision, of a metro station are highly significant and continue over long time periods. Future decisions of land use, intensity, employment, retail provision and local character revolve primarily around the provision, or non-provision, of a station. The station or lack of station has a great, if not the greatest, impact on a place.

These are critical factors to consider in the Concept application, as they will have the greatest impact and be of greatest concern to the local community. In particular, choosing not to supply a station has an adverse impact on a community as no other metro line is likely along this route or intersecting with it. This is a once and once only opportunity to provide the community with the benefits of increased connectivity with more frequent, reliable and timely improved access to jobs and facilities.

Productivity benefits through careful and considered control of land use

Development immediately above and adjacent to metro stations can add to the overall number of trips, and overall productivity benefits, through careful control of land use. If each station on a metro line provides in the immediate vicinity [above and adjoining the station] facilities that are trip destinations, residents along the line can access these facilities by Metro rather than another mode.

The facilities can, over the various stations include: spaces for employment; entertainment areas, including late night entertainment; health facilities; retail facilities; and recreational facilities. Trips are contained to the metro line, which increases the number of trips and operational revenue thereby improving the viability of the line. In contrast if residential land use predominates in the immediate vicinity of stations, potential trips and the wider benefits of modal shifts are lost.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Assess the long-term effects on communities on the route that have a station, or do not have a station, particularly in relation to Pyrmont. This should include:
 - local and line wide economic effects such as productivity effects, property values and the opportunity costs of travel times and congestion effects;
 - long term effects on carbon emissions and local air quality
 - social effects linked to mobility and access
 - an explanation of the '30 minute city' concept
- Assess land use choices at stations in relation to:
 - the provision of the full range of facilities that the combined communities along the line need
 - savings of capital costs in relation to the future provision of community facilities by consolidation along the line
 - maximising the modal shift effect of the line
 - increasing the total number of trips on the line

2.3. SEARs working contrary to integrated transport and land use outcomes

The adoption of 'conventional' SEARs fail to reflect the recent evolutions in NSW Government Transport policy and structure of transport and land use agencies.

The SEARs reflect the traditional demarcations of the specialist 'silos' that would assess environmental impacts and risk embedding/driving poorly integrated transport, land use and place outcomes.

RECOMMENDATION

The standard SEARs headings should be revised to drive better analysis and outcomes:

- Define SEARs to embed the integrated transport and land use outcomes that the NSW Government is seeking to achieve. Examples include:
 - *Outcomes for people and places – allocating street space to reflect priorities*
 - *Establishing places for people around stations*
 - *Access for people*
 - *Changes to the transport system following project operation*
 - *Impacts to the transport system during project construction*
 - *Metro system safety, resilience and redundancy*
 - *Towards carbon zero*

2.4. Statutory Context

Local Strategic Planning Statements

The City of Sydney, along with other local governments, has recently prepared its *Local Strategic Planning Statement* that sets the direction for the community in relation to housing supply, supply of space for jobs, and local character. Assumptions on these topics will vary in relation to the Sydney Metro West project. In the case of Pyrmont, not supplying a station will limit the supply of space for jobs, undermine the resilience of Central Sydney and limit Parramatta's access to the highly skilled population living there.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Include a response to the various councils' Local Strategic Planning Statements. With regard to the City of Sydney, attention should be paid in particular to pages 68 onwards of the City's *Local Strategic Planning Statement* which describes the City's need for a station at Pyrmont

3. Specific Issues to be considered in the SEAR's

3.1. Changes to the transport system following project operation

(Referred to as “*Operational Traffic Impacts*” at the Planning Focus Meeting (PFM) convened by the Department of Planning, Industry & Environment on Monday 28 October 2019 to discuss the project in more detail.)

The changes to the operation of the transport system following the construction process are more lasting and important than shorter term issues during the construction phase. This is material for a transformative project like Sydney Metro West and makes this a critical issue that needs to be scoped and considered very carefully.

RECOMMENDATION

Rename “*Changes to the transport system following project operation*” rather than “*Operational Traffic Impacts*” and re-scope to:

- Embed mode shift within the SEARs. This will influence where stations are located and what changes are required to the transport system. This will influence VKT, emissions and safety outcomes to a much larger extent than trend based modelling (e.g. in the Strategic Transport Model)
- Include changes to the transport system following project operation:
 - Modify the bus network to feed rather than compete with Sydney Metro West
 - Deprioritise road network expansion to areas served by Sydney Metro West (traditionally, NSW Government has prioritised providing competing arterial traffic route when they invest in rail)
 - Include safe access networks for people walking and cycling to metro stations within the Metro project

3.2. Impacts to the transport system during project construction

(Referred to as “*Construction Traffic Impacts*” at the PFM.)

Much of the construction of the Metro will take place in highly congested, pedestrian-heavy and economically valuable places.

Also, construction will impact not only traffic, but movement of people walking, cycling and on public transport

The SEARs should require an overall construction transport and traffic management plan that covers:

- Strategies for construction access in highly congested, pedestrian-heavy and economically valuable places, especially the City Centre but also for Pyrmont (and Parramatta and Sydney Olympic Park). These should outline how the ongoing improvement of places in Sydney will be supported, not diminished
- Strategies to require Transport for NSW to demonstrate the need to reopen roads closed for more than 12 months, similar to the situation in London and experience with the construction of the CBD and South East Light Rail.
- Opportunities for spoil removal using waterways/barges, especially for the Bays
- Strategies to ensure construction and spoil removal vehicles access the motorway network immediate to the station or spoil facility (e.g. WestConnex for

Bays). This could include special arrangements within the motorways for both tolling and priority for vehicles

- Strategies to complement road based spoil removal activities (spoil removal using waterways/barges, especially for the Bays)

RECOMMENDATION

Rename “*Impacts to the transport system during project construction*” rather than the current “*Construction Traffic Impacts*” and re-scope to:

- Require clear strategies for construction access in highly congested, pedestrian-heavy and economically valuable places, especially the City Centre but also for Pyrmont (and Parramatta and Sydney Olympic Park). These should outline how the ongoing improvement of places in Sydney will be supported, not diminished
- Require Transport for NSW to demonstrate the need to reopen roads closed for more than 12 months, similar to the situation in London and to address the experience with the construction of the CBD and South East Light Rail (where traffic lanes were re-instated only to be not required).
- Embed the network and place impacts of spoil removal into the SEARs in order to drive alternatives such as barging
- Embed strategies for road safety into operational planning. This should address safe system elements – vehicles; drivers/education; roads and low speeds
- Include measures to mitigate any impacts on walking, bicycle and public transport networks to an equivalent standard.
- Include workplace travel plans that encourage journey to site by sustainable transport for construction workers and contractors

3.3. Integration into the multi-modal transport system and delivering quality place outcomes

The networks that provide access and services to the metro stations should be developed before the project opens, and should be extended as land use evolves. Walking is the most cost effective way of accessing metro services. The connections for people walking within 1.2 km of a metro should be prioritised as part of the project and completed before the services commence. These routes should be permeable, and have crossings that prioritise people walking over through vehicles. The public domain should provide a high level of service to people walking in order to encourage access by walking.

The infrastructure for people riding bikes should extend from the station precinct and connect to the principle Bicycle Network, and the network should be expanded to include these links. The new links should be provided before the station opens.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Include a requirement to provide for the completion of networks and connections for active transport before the project opens

3.4. System safety, resilience, redundancy - Reliance on one CBD station

As currently envisaged, there will only be one metro station serving the future Harbour CBD (at around Hunter Street). The next closest metro stop would be at Bays (extensions may add further City Centre locations, but this cannot be assumed.)

The City notes that this is in stark contrast to the Sydney Metro City & Southwest station array, and that on most rail lines serving the Harbour CBD.

For people in the City Centre south of around Bathurst Street, access to the CBD north metro stop would be around 1 km, requiring a long walk or additional transfer. A station in Pyrmont would provide an additional point of access for the City Centre as it expands south.

Additionally, the City is concerned about the implications of a significant operations failure at the single CBD terminus station. From a rail operations perspective, we need to understand the contingency plan for commencing operations at the Bays metro station. More importantly, how do City Centre passengers access the Bays - it is too far to walk for many customers (whereas Pyrmont would be sufficiently close and well connected) if there is an access or service issue in the CBD station.

There may also be capacity risks arising from focussing the whole system interchange at one highly congested City Centre location.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Require an explanation of the future network integration strategy, and how this avoids any interchange-driven caps on service capacity, on any element of the system.
- Require an assessment and justification of the proposed station spacing from an operational resilience point of view.

3.5. Security and protection

Bollards and barriers in the public domain

Metro stations in the City Centre and other locations will bring about increases in pedestrian activity beyond current levels. The Metro also has the potential to improve the quality and value of the place in which it is located.

There will be a premium on public domain and space for walking in and around new stations, which is compromised by bollards and barriers in the public domain. At the same time, the risk of vehicular terrorism, or more generally road safety risk from exposure to vehicles, requires security and protection protocols to keep metro passengers safe.

The City's view is that wherever possible this should be addressed within the station envelope, supported by road space reallocation which keeps vehicles away from around stations in order to reduce the risks.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Cover the need to mitigate security risks and incorporate this into the design of the station precinct, to avoid impacts within the public domain around the station.

3.6. Key environmental issues and sustainability

Construction and operational environmental issues

Sydney Metro West should be required to closely follow the example of the existing Sydney Metro projects that have established a strong standard on sustainability in relation to construction and operational environmental issues.

RECOMMENDATION

The SEARs for the Sydney Metro West Concept assessment should:

- Cover both construction and operational environmental issues.
- Sustainability objectives, targets and initiatives should meet or exceed those stated in the Sydney Metro City & Southwest Sustainability Strategy, see: https://www.sydney metro.info/sites/default/files/document-library/CSW-Sustainability-Strategy-June-2019_0.pdf


26 June 2020

Our Ref: 2020/246957

Your Ref: SSI-10038

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

Attention: Belinda Scott



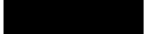

By email: 

Dear Belinda

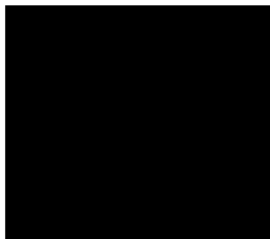
City of Sydney submission on Sydney Metro West Concept and Stage 1 - EIS

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 
, Manager Transport Major Projects on  or at .

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 Pymont 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 Pymont 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 Pymont but not addressed in any detail in the EIS. They are also only partially reflected in the NSW Government's Pymont 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 Pymont, being undertaken by Sydney Metro, and the subsequent consideration by the NSW Government.

3. Pymont Station

3.1. Critical need for station

The City has consistently set out the case for a station at Pymont to maximise the wider economic benefits of Metro West. The City acknowledges that the NSW Government is investigating whether to include a station at Pymont and is also potentially leading the Pymont 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 Pymont.

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 Pymont-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 – Pymont 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.

7 December 2020

Our Ref: 2020/246957-01
Your Ref: SSI-10038

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

Attention: Michael Lahoud
By email: 

Dear Michael

City of Sydney response to Sydney Metro West (SMW) Amendment Report and Submissions Report


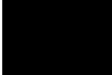
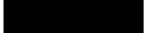
Thank you for the opportunity to provide comments on the SMW Amendment Reports and Submissions Report.

The City notes the detailed summary of its input to date in the Submissions Report.


The City notes that since the June 2020 Stage 1 Environmental Impact Statement (EIS), there has been no update on key issues affecting the City:

- Confirmation of a Pyrmont Station
- Location of City Centre stations
- Construction process for Bays-Pyrmont-City Centre section
- Extension of the metro line to the South East, via Central and Camperdown-Ultimo and to Zetland and Randwick, ideally by 2030-1.

The City therefore stands by its positions contained in its Stage 1 EIS submission. The City seeks further advice as soon as possible on the status of these issues, and a firm commitment to a process and timeline for resolving any currently unresolved issues

Should you wish to speak with a Council officer about the above, please contact 
, Manager Transport Major Projects on  or at

Yours sincerely,



Andrew Thomas
Acting Director
City Planning | Development | Transport