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Sydney Business Chamber Response to Sydney Metro West Environmental Impact Statement

Thank you for the opportunity to respond to the Sydney Metro West EIS.

Sydney Business Chamber is a leading advocate for Sydney as a competitive and global city. A division of Business NSW, formerly NSW Business Chamber, Sydney Business Chamber represents over 145 leading corporations. We identify, develop, and promote public policy to drive the economic growth and sustainability of our great City.

It is positive to see the NSW Government continuing to make progress on State Significant Infrastructure following the social and economic disruption of the Covid-19 crisis. As NSW recovers, investment in strategic infrastructure will be a crucial driver of employment and the return to growth.

The Chamber has been a longstanding supporter of the Sydney Metro West project and the Government is to be commended for progressing this critically important extension of Sydney's transport network. Connectivity between Sydney's two largest centres - Sydney's CBD and Parramatta – has been a growing problem over recent decades.

Notwithstanding improvements to the Western Line and the more recent completion of the early stages of Westconnex, congestion and transit times between these two centres has considerably worsened. Without a new, high volume and high-speed transport connection, both the road and rail connections between these two centres will be soon be overwhelmed.

The Sydney Business Chamber supports the prioritisation and fast tracking of this project as part of the much-needed economic stimulus for Sydney and agrees with the assessment of strategic need for the concept and Stage 1 as provided by the EIS.

This response addresses specific opportunities relating to the Sydney Metro West project in the broader City CDB region, namely Pyrmont/Ultimo area, and complements submissions from Business NSW and Western Sydney Business Chamber.

In reviewing the EIS there are a number of amendments and recommendations that should be considered prior to the final project progresses to the next stage.

Balancing speed over activation: the importance of travel times.

The Chamber supports the principle that there is a need to balance prioritisation of transit speeds over urban activations. We also agree with the EIS's stated objective of achieving a sub 25-minute trip between Parramatta and the CBD. If Sydney is to achieve the goal of become a 30-minute metropolis, then linking our two largest urban centres quickly is essential. The Chamber understands that achieving this goal does however mean a tradeoff between the number of stations along the route, the route

alignment, and which precincts can be activated with more urban development. The main concerns that the Chamber has with the current draft Proposal is that we have not quite got this balance right. That some of the assumptions made in the EIS are not based current information, studies, and economic benefit.

Getting the tradeoffs right

When the Western Metro was first announced in 2016, then Premier Baird outlined a route which included just four stations including CBD. These stations were chosen based on the best available evidence and planning at the time. The Sydney Olympic Park Authority was completing their draft Masterplan and Urban Growth had finalised their vision for the Bay Precinct. Both of these projects outlined the need for better transport connectivity as critical to achieving their activation and role in shaping the city.

However, in the intervening four years, considerable planning changes and policy reforms have been implemented which bring into question some of the assumptions which underpin the selection criteria for stations in the EIS. Before the EIS is finalised the Chamber recommends that the Government review some of these more recent planning studies and policy changes and reassess whether the current suggested stations are really the highest priorities.

Station at Pyrmont Ultimo a must have

Over the past year, first the Greater Sydney Commission, and subsequently the Department of Planning Industry and Environment have been reassessing the planning and land use controls for the Pyrmont/Ultimo area with a view to significantly increasing both the urban density and employment potential for this precinct. This review is currently being finalised and the Chamber has been active in providing input into these agencies through direct submissions and as a member of the Western Harbour Alliance.

One of the biggest impediments holding back the Pyrmont/Ultimo precinct is its relatively poor connectivity with the rest of the metropolis. While it is proximate to the CBD, Darling Harbour presents a significant barrier to both pedestrians, services, and deliveries. Almost all of the precinct is outside the 800 metre 'Ped shed' for any of the stations on the City Circle or Northern Metro lines. Other transport services such as buses and ferries are constrained, and the road network is at capacity. For the government to realise its aspiration of employment and economic growth by expanding the CBD to encompass Pyrmont/Ultimo, then overcoming the areas connectivity deficit is a necessity. A station on the Western Metro at Pyrmont will facilitate this critical connectivity and drive employment, investment, and amenity.

Reassessing the merits of the Bays Precinct Station

In championing the case for including a station at Pyrmont/Ultimo the Chamber understands that this will have a significant impact on the transit time for the Metro. In light of this, we recommend the government reassess the inclusion of a station at White Bay.

Previously, in responding to the Pyrmont Place Strategy, the Sydney Business Chamber submitted:

"The Chamber strongly believes that better public transport is critical to the future social and economic vitality of the precinct. To this end we have been pushing for the inclusion of a new station on the proposed Western Metro. We understand that the Western Metro's effectiveness might be undermined if too many stops are introduced on its route, however a station at Pyrmont has much more strategic merit than a station under White Bay and should be given greater priority.

The Chamber believes the proposed metro station under White Bay should be reconsidered. Much of the original rationale for this station is now gone because of changes to the WestConnex interchange at Rozelle. As has recently been shown, much of the Bay's Precinct can still be developed (such as the Fish Markets and Rozelle Stabling Yards) without the need for an enabling metro stop. Furthermore, the GSC's planning directive "A city that Works" clearly states that the critical shortage of employment lands in the Eastern City means areas like White Bay should not be lost from industrial and port activity.

However, a metro station at nearby Pyrmont has much greater strategic merit and ‘city shaping’ impact. The biggest constraint to the future development of the Pyrmont Peninsula is its lack of connectivity to the rest of the Sydney. This constraint would be removed by inclusion of a metro station at Pyrmont.”

The case for the station at Pyrmont has significantly more strategic merit or city shaping impact than a station at the Bays would provide.

When the Western Metro was first announced considerable work had been undertaken by Urban Growth on the capacity of the Bays Precinct to support both new residential and commercial activities as part of its urban renewal. The work outlined the key subsections of the Bays Precinct and divided the areas into two - a western precinct covering White Bay and Glebe Island and an eastern precinct centered on the Fish Markets and Black Wattle Bay. At the time it was assumed that the urban activation of the Bays could only be achieved through the provision of a new metro station. It was based on this work in 2015, that the Bays was identified as a priority station on the future Western Metro.

However, in recent years many of the original assumptions which underpin the strategic case for the Bay Precinct’s urban renewal have been challenged. Furthermore, the development capacity of the precinct has been substantially undermined by recent land use and infrastructure changes. Finally, it is questionable whether development in much of the precinct is still compliant with the directions of the new finalised **A Metropolis of Three Cities – The Greater Sydney Regional Plan**.

Much of the original argument to support a station at White Bay was based on the perceived need for better transport to support greater commercial and residential density. However, much of this argument is now contested. As recently as June 2020, the Government approved the redevelopment of the fish markets site for a mixed used, high density development and approved construction of new and larger fish markets on Blackwattle Bay. This was approved without any extra transport services and no metro station. Furthermore, this development is much closer to a potential station at Pyrmont (some 150-200 metres) than it is to a station at White Bay (some 850-900 metres). Indeed, the entire eastern half of the Bays Precinct is better serviced by a station at Pyrmont than one at White Bay. This clearly indicates that much of the original strategic case for a station at White Bay was misaligned and that much of this original vision would be actually realised by a station at Pyrmont.

Furthermore, much of the original planning for the western half of the Bays precinct was done prior to the finalisation of construction plans for the Westconnex interchange at Rozelle. This interchange has significantly reduced the development capacity of the Rozelle marshalling yards. Being now an underground interchange, it also fails to remove the land transport and access issues which have prevented the site being redeveloped in the past.

Another consideration which the EIS failed to consider are some recent changes in Government policy. In the years since Urban Growth original masterplan for the Bays precinct was advanced, the Greater Sydney Commission finalised **A Metropolis of Three Cities – The Greater Sydney Regional Plan**. This Plan clearly identifies the need to retain all existing employment and industrial lands in the eastern City. This directive was further reinforced by the publishing of **A Metropolis that Works**. The White Bay and Blackwattle Bay employment lands are the only substantial industrial zoned lands adjacent to a deep-water port outside the privately owned Ports at Botany and Port Kembla. These lands currently provide some crucial urban services, including ferry and charter boat refueling, concrete batching and distribution, cement and clinker industries, chandlers, slip-ways and dry boat storage, as well as home to the largest heritage fleet in the southern hemisphere.

Finally, if the government remains committed to activating the western Bays area with greater development density perhaps alternative transport options could be considered, such as a short extension of the Inner West Light Rail. The EIS gives a clear indication that the construction of a Metro station at White Bay would be the most expensive of all the stations along the route. Extending the Light rail would be much cheaper.

Notwithstanding the original masterplan for the Bays precinct the Chamber recommends that the strategic merits of a metro station at White Bay should be reviewed in favour of a station at Pyrmont.

Conclusion:

Sydney Business Chamber supports Sydney Metro West as a significant investment that is justified and will meet a strategic need. However, the full realisation of its benefit will only be delivered where there is a station at Pyrmont to serve and facilitate employment and economic growth.

Should you have any questions about this submission or would like to discuss in more detail, please feel free to contact me at katherine.oregan@thechamber.com.au

Yours sincerely



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