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Business NSW response to Sydney Metro West Environmental Impact Statement

Thank you for the opportunity respond to the Sydney Metro West Environmental Impact Statement (EIS).

The development of the Metro network in Sydney is a transformative step to a 21st Century transport system. Expansion of the Sydney Metro network through Sydney Metro West (and subsequently Sydney Metro-Western Sydney Airport) will better integrate Sydney's Eastern Harbour City with the Central River City of Parramatta and the future major developments at the Western Parkland City and Western Sydney Airport/Aerotropolis.

Realising the full benefits of the investments in the Western Sydney Infrastructure Plan requires that developments at Western Sydney to be well connected to the rest of the urban area. Business NSW has been a longstanding supporter of the Sydney Metro West project, and we are pleased to see its progress to the EIS stage. Business NSW agrees with the assessment of strategic need for the concept and Stage 1 as provided by the EIS.

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 a return to economic growth.

This response addresses some of the strategic issues relating to the Sydney Metro West project and its ability to deliver benefits for businesses in NSW. We also endorse submissions from Sydney Business Chamber and Western Sydney Business Chamber, which highlight specific opportunities in their respective parts of the city.

Skills legacy

Following the example set during construction of earlier lines of the Metro system, Metro West can continue to create a skills and employment legacy for our workers and businesses. Business NSW supports the Infrastructure Skills Legacy Program (ISLP) which sets targets for select large construction projects. The program will ensure these projects pave the way for improving our workers' skills and increasing the representation of young people, Aboriginal and Torres Strait Islander people and women in the construction industry.

Formerly NSW Business Chamber, Business NSW is the peak policy and advocacy body which has been representing businesses in NSW since 1826. Business NSW is one of Australia's largest business support groups with a direct membership of 20,000 businesses. Business NSW works with government, industry groups, as well as business and community leaders to provide a voice for our members. Operating throughout a network in metropolitan and regional NSW, Business NSW represents the needs of business at a local, state and federal level

Earlier phases of Metro have served as a demonstration of the benefits of the program, and Business NSW endorses the ISLP being made a standard part of major projects the government develops.

A focus on training – or retraining – workers in construction skills is acutely needed in the wake of the unprecedented decline in employment levels due to the COVID-19 crisis.

Business NSW believes there is scope to create a similar legacy to grow and develop competitive local industry capability. Procurement processes must be appropriately structured to provide competitive local SMEs with adequate opportunity to be involved as this would not only benefit the businesses themselves, but also strengthen NSW's industry capability and create additional jobs. This means that procurement selections cannot focus on purchase price alone. Assessment of tenders and design of procurement strategies should consider tax revenue and local employment implications of utilising NSW-based business.

Business NSW is acutely aware of the need to ensure taxpayers receive value for money in the procurement of goods and services. However, an approach that simply selects the cheapest purchase price fails to acknowledge the 'whole of life' costs in the delivery of public goods and services. It also fails to recognise the potential benefits that can be achieved from local investment over the longer term.

Station locations

To maximise the benefits from the development of the Metro West line, a station at Pyrmont is essential. In [responding to the Pyrmont Place Strategy](#), our colleagues at 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 is strong. Negotiations over the balance of funding between government and local developers are reasonable, so long as they lead to an agreement. In addition to resolving the uncertain status of the Pyrmont situation, there is potentially scope to take advantage of the development of Metro West to aid the regeneration of another suburb along the route, which is currently missing a station in current proposals.

The [draft master plan](#) for a redeveloped town centre at Camellia “establishes the framework for delivering up to 10,000 new dwellings with 5,000 new jobs”. Colleagues from the Western Sydney Business Chamber, in a [joint industry submission](#) on the Sydney Metro West Camellia station option, point out that:

“Camellia was one of the five station options between Olympic Park and the Parramatta CBD considered in 2018. Subsequently the options narrowed between Camellia and Rydalmere. Now that Rydalmere has been ruled out as a candidate for a metro train station, our organisations jointly recommend further investigation into Camellia as the best option. We feel it has not been properly considered based on the evaluation described in Table 3-8 (below) within the Environmental Impact Statement (EIS), and we see the potential for outperformance for many of the evaluation criteria...

We believe that a metro station, located at, or in proximity to, the Camellia Town Centre (exhibited by DPIE in 2018) would catalyse major urban renewal and result in a significant uplift in employment and residential floorspace in the Central City. Camellia could provide an interchange between Parramatta Light Rail and Sydney Metro West. There is also the possibility for ferry access providing one of the few locations in Sydney where three different public transport modes can interchange.”

Camellia is designated for significant urban renewal under the Camellia Master Plan. Developers in the area are willing to contribute to the costs of a ‘box’ that would allow a metro station to be completed at a later date after the line is open. If Sydney Metro enables this option, it has the chance to have a neighbourhood with transport access central to its design. A station at Camellia also has the possibility to add a further interchange point to the Parramatta Light Rail network.

Uncertainty over the status of the Camellia Master Plan and the timing of proposed renewal of Camellia town centre should not stand in the way of constructing enabling infrastructure for a station now. This can be developed alongside the Camellia town centre into a key interchange point in between the Sydney Olympic Park and Parramatta hubs.¹

Minimising local business impacts

Chapter 16 of the EIS provides an assessment of the potential impacts on businesses during Stage 1 and shows mitigation measures to minimise these impacts.

Business NSW hopes that the Department has taken on board lessons from other recent transport infrastructure projects. Efforts to minimise the impact of major construction works on neighbouring businesses have been hindered by:

1. poor communication with businesses, with many complaining of not knowing when works would be conducted, for how long disruptions would occur, nor the types of

¹ DPIE is considering its [proposal for the Camellia Town Centre](#). It is also considering the recommendations from the Greater Sydney Commission’s [The Place-based Infrastructure Compact \(PIC\)](#). The PIC proposed deferring the redevelopment of Camellia. Western Sydney Business Chamber’s response to the PIC proposals [can be found here](#). The response observes that, “the Camellia light rail stop would be underutilised for the foreseeable future if the NSW Government accepts the PIC recommendation to defer the Camellia Master Plan. The Chamber suggests that the PIC should consider moving Camellia-Rosehill to Phase 2 of the Sequencing Plan and ... identify a funding pathway forward that would enable the precinct to proceed sooner.”

activities being carried out. This made it difficult for them to plan their business operations

2. construction impact compensation and property acquisition schemes that were slow and laborious and which provided smaller than anticipated payouts to some of businesses.

The works needed for the Metro are different in character from other projects, such as the CBD and Parramatta light rails. Though city blocks will be closed off entirely for each of the construction sites, there will not be construction works along streets. This should mean the number of businesses affected by construction is both smaller in number and less severe in the degree of disruption than was the case with the light rails.

While some loss of local amenity in Parramatta CBD is unavoidable, there is scope to go further than the assessment describes in mitigating these impacts. As the construction site will not occupy the full footprint of the city block it sits within, there should be efforts undertaken to ensure that businesses in the remainder of that block are preserved. If this is not possible, premises should be kept useable for other businesses to use.

Small cafes and other 'stall' style businesses may also be viable around the perimeter of construction sites. These could both serve construction workers as well as keep those blocks integrated with their neighbouring streets, preventing them becoming dead zones. Involving local artists in designing hoardings around the site, for example, could be a further way of reducing the amenity loss of the site at low cost.

Conclusion

Business NSW supports Metro West proposals and agrees that the project is justified and meets a strategic need.

If you have any questions about this submission or would like to discuss in more detail, please feel free to contact me at Simon.Moore@businessnsw.com.

Yours sincerely

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