PIA NSW SUBMISSION
SYDNEY METRO NETWORK STAGE 1 (CBD METRO)
ENVIRONMENTAL ASSESSMENT

About PIA

The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 4,500 members nationally and around 1,300 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating key planning and public policy issues. This submission has been prepared on behalf of PIA NSW by members of the Institute.

Introduction

The Planning Institute of Australia, NSW Division (“PIA”) is pleased to make this submission in response to the invitation for comment on the Environmental Assessment for Sydney Metro Network Stage 1 (CBD Metro). PIA’s comments focus on the context of the project in relation to strategic planning for the Sydney Region. The submission reflects comments made in PIA’s recent submissions on the Transport Blueprint for NSW being prepared by the NSW Department of Transport and Infrastructure; and the Independent Public Inquiry on a Long Term Public Transport Plan for Sydney. In principle, PIA supports the future development of a metro network to serve high density areas of Sydney. PIA is encouraging a greater emphasis on strategic and integrated land use and transport planning. In the absence of a long term transport plan that reflects the objectives of the Metropolitan Strategy and Centres Policy, PIA recommends that construction of the Sydney Metro (CBD and West Metro) should be postponed.

In relation to the CBD Metro Project, PIA considers that the proposal highlights the failure of the current legislation to properly plan for and deliver major State infrastructure. The Project is being developed in isolation from proper strategic and integrated planning that should precede any work on a route or station identification. The CBD Metro is an example of how major development or infrastructure projects in Sydney continue to be released without the necessary prior strategic framework that should guide its design and delivery. Moreover, the current legislation does not effectively deal with the approvals mechanism for such projects in a comprehensive way. It relies on ad hoc special state policies to circumvent normal processes which then undermine confidence in the planning system.
PIA NSW Policy Agenda: Strategic Planning

Strategic Planning underpins PIA’s current policy agenda for NSW. PIA is keen to promote the role of strategic planning as essential for private and public investment decision-making and integral to good governance.

PIA’s policy agenda has three main focus areas:

1. New Planning Acts for NSW: Two separate Acts; one to address plan making, dubbed the “Strategic and Integrated Planning Act”; and development administration, dubbed the “Land Use Administration and Development Assessment Act”

2. Comprehensive, Integrated Planning for the Sydney Metropolitan area to accommodate growth in the medium to longer term: To pull together State and Regional planning strategies, policies and plans into one document including:
   - An updated Metropolitan Strategy
   - A comprehensive centres policy
   - An integrated transport plan
   - An infrastructure plan.

The CBD Metro project has not been developed in the context of any of the aforementioned strategies or plans. The sort of incremental planning in NSW represented by the CBD Metro Project makes a mockery of all previous planning instruments that are affected by the Project. Although it is argued that plans need to be flexible to allow for change, a project of the scale of the CBD Metro must be considered only in relation to the other infrastructure and land use plans and must not be implemented as a layer over other plans. This Project will have major repercussions for land use and infrastructure in the CBD and along the route. It should not proceed until the necessary planning work and consultation on that planning has occurred.

3. Strategic Planning at the local level. A renewed emphasis on, and commitment to, strategic planning by local councils.

In relation to the CBD Metro Project, there has not been adequate strategic planning at the local level along the proposed and future route to ensure that the economic, social and environmental implications have been addressed.

Consistent with this agenda, and with PIA’s National Position on Integrated Transport and Land Use Planning 1, PIA’s submission on the Transport Blueprint and the Independent Public Inquiry on a Long Term Plan for Public Transport encouraged an emphasis on the integration of (public) transport and land use planning, including land use changes in developed areas and future land releases. PIA submits that the NSW Government requires a fundamental structural change in the way transport (with land use) planning occurs. That change means a shift away from the current approach involving specific transport projects to one involving an analysis of the spatial relationships that exist, and are developing, between the cities and regions of the metropolitan

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area as a result of land uses and then configuring a transport system that supports those interactions.

**An Integrated Land Use and Transport Plan for Sydney**

PIA understands that the Metropolitan Strategy ("City of Cities: a Plan for Sydney’s Future") released in December 2005 is due for five year review. PIA believes that the updated Metropolitan Strategy should integrate within it the revised Centre’s Policy ("Planning for Retail and Commercial Development") currently being prepared by the Department of Planning; and the finalised Transport Blueprint for NSW.

It is not appropriate for transport planning to be done on a “project by project” basis, such as the proposed CBD Metro. Projects need to be planned and assessed only as part of a longer term, adopted, integrated land use and transport strategic framework. Major pre-emptive infrastructure projects such as CBD and West Metro should be deferred pending development of an integrated Metropolitan Strategy.

An integrated Metropolitan Strategy, incorporating land use and transport plans, should determine the priorities, funding arrangements and projects (in particular, public transport projects to support future land use plans) to proceed based on a staging timetable.

An “Integrated Land Use and Transport Plan” for Sydney should be secured and given statutory force through legislation. This is needed to ensure bi-partisan support, provide longevity beyond changes of government, and to legislate for implementation and funding commitments.

Further, PIA proposes the establishment of a single authority to plan, manage and govern land use and transport, such as a “Sydney Metropolitan Authority”. A “Sydney Metropolitan Authority” model for the Sydney geographic area could have elected and appointed decision makers with responsibility for:

- Strategic regional planning (local government retains responsibility for local planning) including reservation of corridors for transport routes and determining appropriate land uses and densities around transport nodes
- Delivery of all regional infrastructure including water, sewer, roads, rails (heavy, metro and light), buses, ferries, waste management, and possibly local renewable or sustainable energy supply (local government retains responsibility for local services such as local roads and rates)
- Long term funding through Federal and State Treasuries, tax credits, rezoning value capture, levies, borrowing, bond issues and other sources.

**Sydney Metro Stage 1 (CBD Metro) in a Strategic Planning Context**

As indicated, PIA supports the concept of the future development of a metro rail network in appropriate areas of Sydney as part of a long term strategic transport plan for Sydney; but believes that the current CBD and West Metro Projects should be deferred in the interim. The following comments provide reasons for this position.
1. PIA supports Metro style rail systems in densely built up areas in principle, but only as part of an overall transport solution and as a component of a long term (public) transport plan for Sydney. Any Metro rail link needs to be part of a network and not stand alone. Metro and heavy rail are most efficient when services operate as a partnership rather than as competitors.

2. Transport exists because of land use and land use cannot exist without transport. High intensity land uses cannot reasonably function without quality mass transit systems. Good quality, efficient and affordable transport systems, in particular public transport systems, are essential to support economic development and growth and to maintain healthy, sustainable and liveable communities. Density and public transport must be linked.

3. Metro rail services would be most beneficial in areas not served by heavy rail where bus services are close to capacity and / or travel times are slow due to road congestion.

4. PIA encourages the NSW Government to provide a comprehensive plan to industry and the community of the long term aspirations of a Metro network for Sydney and its integration with other transport modes.

5. PIA questions the need and value of the proposed CBD and West Metro projects as stand alone lines for the foreseeable future when there has already been a huge capital investment in a heavy rail system that could be extended and/or “recalibrated” to utilise existing spare capacity (at least in the short term). Prior to construction of any Metro rail links, maximum capacity from the existing infrastructure for heavy rail and bus transit services must be extracted.

6. There are significant benefits in completing the heavy rail system to provide real increases in capacity while planning the Metro network as a later investment for construction and implementation in, for example, five to ten years.

7. Neither the CBD nor West Metro was planned as part of the current adopted Metropolitan Strategy or State Infrastructure Strategy. The recently proposed West Metro was not planned as part of the draft Subregional Strategies for the Sydney Greater Metropolitan Area and does not align with current long term land release plans e.g. North West and South West Growth Centres. Ad hoc decisions made in the absence of an integrated land use and transport planning strategy will pre-empt better solutions, undermine the community’s confidence in the transport planning of the metropolitan area and send confusing signals to the property development industry for investment.

8. Development of an integrated long term land use and transport plan will identify deficiencies in the current system and priorities for public investment in transport services. Public transport services must be provided in areas that are deficient in such services before major expenditure on a Metro rail service to support areas already

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served by various modes of public transport. Appropriate mass public transit services must be provided to the committed North West and South West release areas before any additional land is released.

9. The planning for routes and station siting should look at opportunities for value capture early in the planning process. Failure to include such mechanisms encourages land speculation. Potential opportunities for value capture to help fund public transport may also be missed.

Conclusion

1. PIA has expressed support for both the NSW Government’s plans to develop a Transport Blueprint for NSW with a focus on Sydney; and the current Independent Public Inquiry for a Long Term Public Transport Plan for Sydney and anticipates these processes will assist the development of an “Integrated Land Use and Transport Plan” for the Sydney Metropolitan area.

2. An “Integrated Land Use and Transport Plan” that establishes strategies for the State, Sydney Greater Metropolitan Area, regions and local areas to the year 2040 should be developed and incorporated in the State Plan and the State Infrastructure Strategy.

3. PIA NSW recommends that all planning and construction work on the proposed CBD and West Metros be put on hold until an “Integrated Land Use and Transport Strategy” is approved and legislated.

4. PIA also recommends the adoption and implementation of the current draft Subregional Strategies for the Sydney Metropolitan Region is postponed pending the finalisation of the integrated and updated Metropolitan Strategy and / or “Integrated Land Use and Transport Plan”.

5. PIA is concerned at the continued development of the growth centres without adequate public transport. Instead PIA advocates settlement in existing urban areas well served by public transport until such time as adequate and fully funded public transport infrastructure is delivered to the growth centres, or other urban release areas.

6. PIA seeks to highlight and emphasise the need for holistic planning solutions to Sydney’s transport needs, as opposed to ad-hoc, short term engineering solutions in the form of individual projects.

PIA NSW
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