

## **SUBMISSION ON THE CBD METRO ENVIRONMENTAL ASSESSMENT**

Solicited by:  
Director, Major Infrastructure Assessments  
Department of Planning

Prepared by: EcoTransit Sydney Inc.

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Submission consists of  
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Please contact the delegated contact for EcoTransit Sydney  
if all components of the submission as outlined above  
have not been received.

Contact person for this submission:  
Leah Mason  
9516 1895

Contact details for Eco Transit Sydney:  
PO Box 630  
Milsons Point  
NSW 1565

See our website at: [www.ecotransit.org.au](http://www.ecotransit.org.au)

**The Director**

Major Infrastructure Assessments  
Department of Planning

Please accept this submission from EcoTransit Sydney regarding the proposal to construct the Sydney Metro Network Stage 1 (CBD Metro), subsequently referred to as the CBD Metro. This submission was prepared and submitted on behalf of the sustainable transport advocacy group, EcoTransit Sydney in response to the request for feedback.

EcoTransit Sydney is a public transport advocacy group operating out of Sydney. We are a not for profit organisation dedicated to the promotion of sustainable transport. EcoTransit Sydney's policy can be broadly viewed as attempting to change the expensive and wasteful system of moving vehicles to a system that moves goods and people in the most energy efficient manner possible. Our policy is based on four simple priorities:

- The need to immediately reduce emissions of greenhouse gases
- The long-standing need to improve air quality
- The need to immediately reduce NSW dependence on oil
- A recognition of the "social good" and wider economic benefits derived from the provision of public transport services.

Public transport, walking and cycling are the best fit for meeting these criteria, and our response to the proposal for the CBD Metro proposal reflects our concerns that the decisions made regarding improvements to public and active transport are properly integrated with the development of other infrastructure and initiatives to reduce emissions and oil dependence as quickly as possible.

If the CBD Metro continues to be the priority of the transport planning in Sydney, communities in the west and north west will continue to bear a disproportionate burden of costs and contribute to the congestion that costs the state something on the order of \$6 billion. As time passes this burden will increase as the CityRail network fails to meet its needs for expanded capacity, and the funds and focus this requires are redirected to a system that will duplicate existing infrastructures.

Yrs,



Leah Mason  
EcoTransit Sydney Submission Contact

## Summary

EcoTransit Sydney's position is that the project application to construct the CBD Metro should be rejected. The Department of Planning should withhold its consent for the project and formally advise the Minister for Planning to this effect.

EcoTransit Sydney believes that current estimates for population growth and demand for public transport will validate a decision to invest significant amounts of public money in public transport infrastructure. However, the current proposal for an isolated and underutilised “enabler” metro branch line does not represent the best use of this mode. It will also choke off a planned expansion of the CityRail Network, that would deliver up to 50% additional capacity at a fraction of the cost of the CBD Metro.

We are especially concerned that approval of the CBD Metro will initiate a shift in the provision of rail-based public transport in Sydney. The apparent intention of the CBD Metro proponents is to reorient Sydney's rail-based public transport system from one whose costs and operations are predicated on it being a “public good” to one based on a notion of “contestability” in public transport service delivery. EcoTransit Sydney cannot discern any public benefit in this approach, particularly when it has already been discredited in the United Kingdom.

**The CBD Metro would prevent future CityRail expansion:** While the CityRail network has weaknesses, these are not sufficient as a rationale for building a separate rail network. The current proposal for the CBD Metro will deny CityRail access to long-reserved expansion corridors, and will significantly affect the future operational capacity of the CityRail network.

**An Inappropriate Alignment – better served by other modes:** Without a further extension to Parramatta (cost \$8.1 billion) or Ryde (cost, \$12 billion), the line from the CBD would run almost empty for many years, even in peak periods, because existing bus and light rail services are quicker, more conveniently accessed, and service a better variety of destinations in the CBD.

**The CBD Metro blocks other, more promising, metro rail proposals:** The proposed CBD Metro alignment would not only permanently curtail capacity expansion on the CityRail network, it would also block other corridors that show promise as metro-style lines. By blocking the reserved western underground corridor at the point it passes under Wynyard Station it would thwart construction of a metro-style line to Mosman and the Northern Beaches. It would also permanently close off the option of a running under Martin Place station and onto Anzac Parade and the south-eastern suburbs. For the same reason there could be no augmentation of services on the Epping-Chatswood line.

**Cost Issues:** We are advised that the proposal is still largely conceptual, and that research on the placement of stations and associated infrastructure, as well as the issues surrounding the construction of tunnels is incomplete. But once again, the notion that \$5.3 billion should be spent on an “enabler” line that will run mostly empty

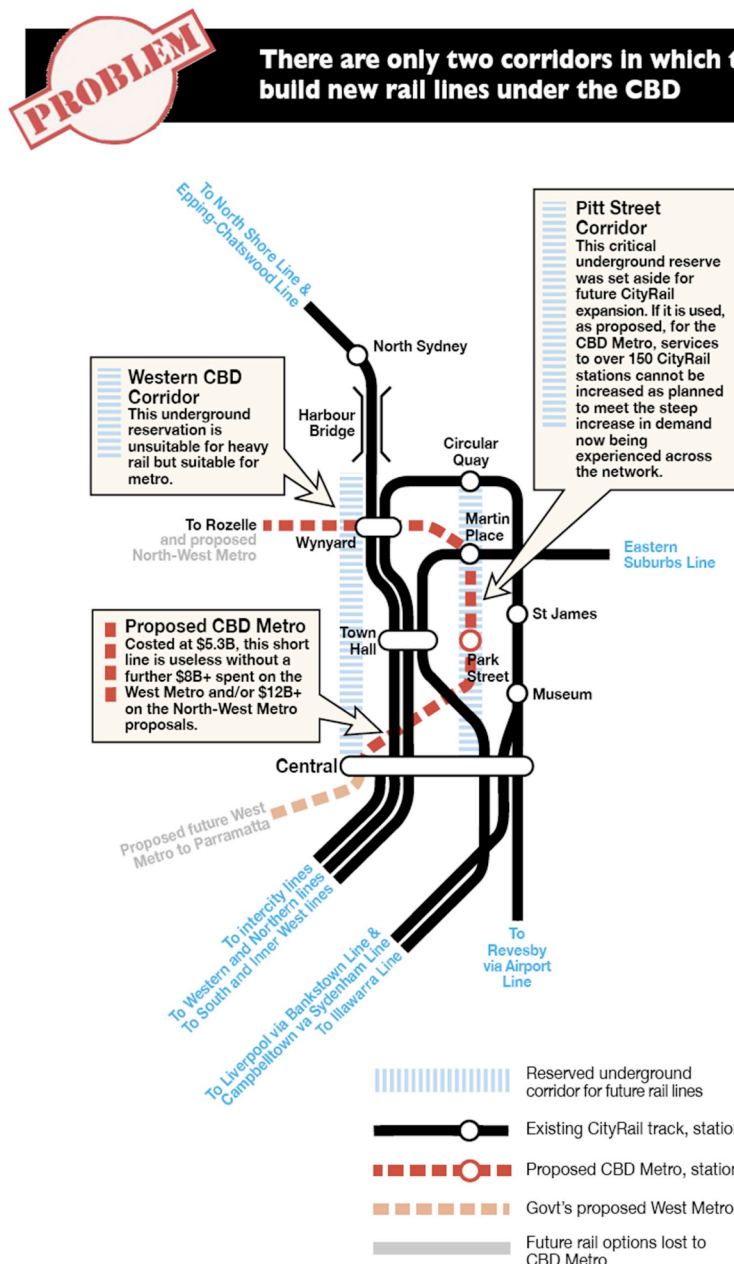
until an additional \$20 billion is spent to reach somewhere beyond Rozelle, and at an indeterminate time in the future, strongly suggests a benefit cost of ratio barely above zero.

**Opportunity Costs:** A service whose primary practical outcome will be a poor duplication of existing bus services in the Victoria Rd Corridor can only be considered as a gross misallocation of scarce public resources. But other opportunities will also be foregone to construct the CBD Metro. The rapidly growing north-west and south-west sectors will have to wait still longer, possibly decades, for a rail service.

**Conclusion:** For the above reasons, EcoTransit Sydney believes that the CBD Metro proposal should be abandoned in favour of the long-planned heavy rail proposals outlined in this submission. While we support the greater capacity that metro-style lines allow, claims for greater frequency than heavy rail will be a matter for the operators to determine. Given the low patronage figures for the CBD Metro, it seems unlikely that such frequencies would be seen as cost effective. The CBD Metro proposal certainly does not address the needs of rapidly expanding housing developments in the north-west and south-west of Sydney.

## Issues In Detail:

The CityRail system represents a huge social investment, that has taken a century to build, and which has served Sydney well. Indeed, last year the NSW government acknowledged that its 2016 public transport patronage targets had already been achieved. It is, therefore particularly difficult to see any logic in the configuration proposed in the CBD Metro Environmental Assessment, given that it will deny CityRail access to long-reserved expansion corridors, and will significantly affect the operational capacity of the remaining CityRail network. As this diagram (below) shows, the decision to use the Pitt Street corridor is crucial to the future of the CityRail network.



The CityRail network is currently operating at a service level significantly below its nominal carrying capacity due to capacity constraints within the CBD area. With two additional heavy rail lines through the Pitt Street corridor, up to 50 % more capacity can be added to the entire CityRail network.

Additional capacity in the CBD means more frequent services to stations in the Illawarra, Bankstown, East Hills and Main Southern lines and major benefits for the Main Western and Inner West lines. However, if the CBD Metro annexes the Pitt Street corridor, as is proposed, urgently-needed increases in CityRail's services will be permanently curbed.

We are especially concerned that the CBD Metro is instrumental in an intention to reorient the public transport system from one whose costs and operations are predicated on it being a "public good" to one based on a notion of "contestability" in public transport service delivery. EcoTransit Sydney cannot discern any public benefit in this approach, particularly when it has already been discredited in the United Kingdom, and in other states of Australia.

For this reason EcoTransit Sydney believe that the Pitt Street corridor should be used, as originally intended, ideally within the next two years, for additional heavy rail tracks under the city.

### **An Inappropriate Alignment – better served by other modes**

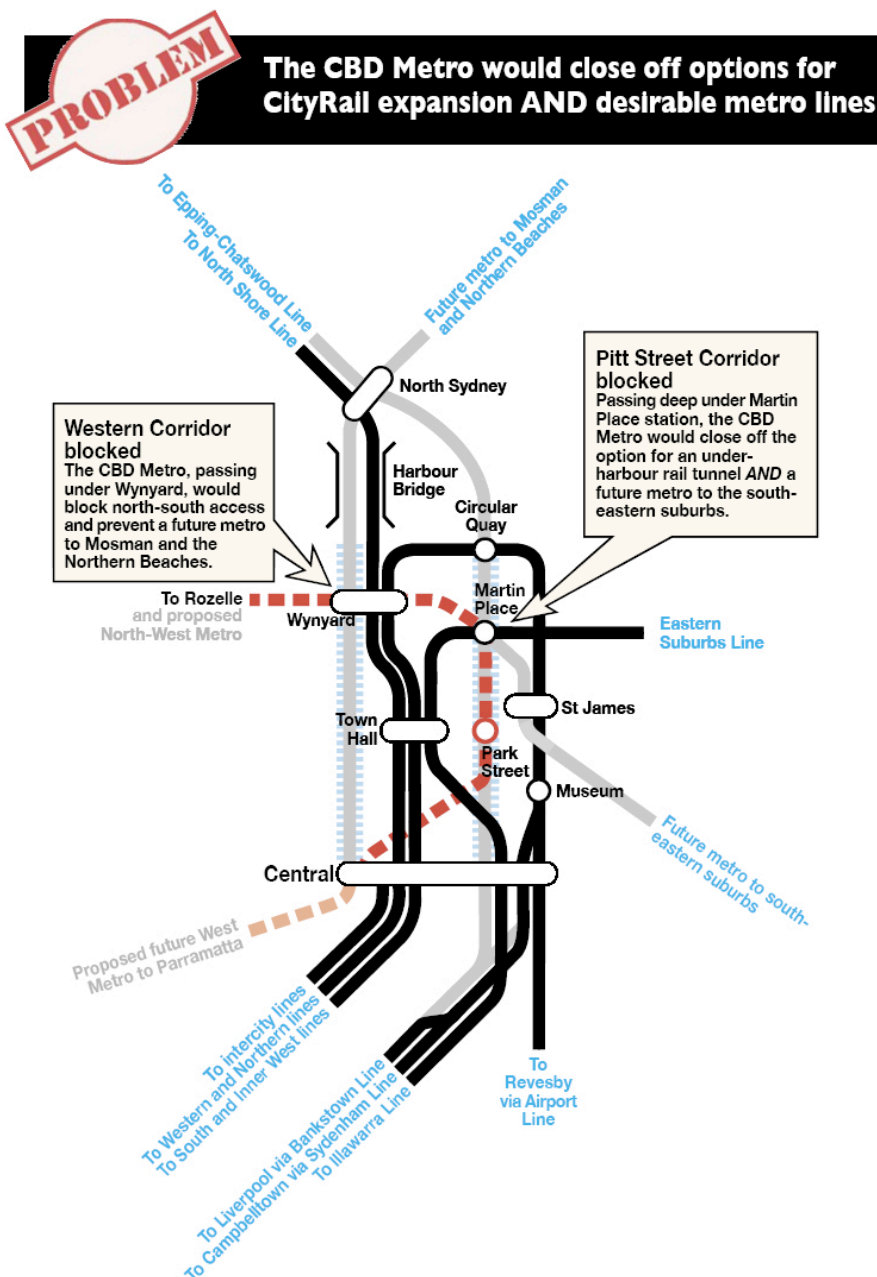
Without a further extension to Parramatta (cost \$8.1 billion) or Ryde (cost, \$12 billion), the line from the CBD would run almost empty for many years, even in peak periods, because existing bus and light rail services are quicker, more conveniently accessed, and service a better variety of destinations in the CBD. Because of their extreme cost, the Parramatta or Ryde extensions could not be expected for at least a decade after completion of the CBD Metro.

The proposed extension to Ryde would require two deep and costly water crossings at Iron Cove and Parramatta River. On such an alignment, stations would be few, and inconveniently located deep underground.

A far better alternative would be to run a fast, high-capacity, light rail service along Victoria Road. This could be completed much more quickly than the proposed metro and at a fraction of the costs. It would provide superior coverage and accessibility, with stops located a few hundred metres apart. Unlike the proposal for a metro along this alignment, light rail services would be surface-based and stops are easily added as are required. A Victoria Road light rail extension could be completed, as far as Drummoyne in a couple of years with further links, running over the Gladesville Bridge, in the future. This would free up existing buses for use in areas of Sydney that are currently under-served.

## The CBD Metro blocks other, worthwhile, metro rail proposals

Metro-style operations have a role to play in Sydney but the proposed CBD Metro route is the least strategic and most expensive option available. It will also block the Metro West underground corridor at the point where it passes under Wynyard Station, eliminating an option for future metro-style line to Mosman and the Northern Beaches, and close off the option for a metro running under Martin Place station and on to Anzac Parade and the south-eastern suburbs. For the same reason there could be no augmentation of services on the Epping- Chatswood line. This diagram (below) demonstrates the problem with the CBD Metro alignment as it affects other proposals for metro lines.



EcoTransit Sydney believe that an alignment for a future metro should utilise the western side of the CBD, where long-planned development opportunities exist – Barangaroo, Broadway and Darling Harbour. Without high patronage levels it is unlikely that the current proposal will meet its construction and operating costs. It is therefore crucial that a metro system is designed in a manner that matches the 'market characteristics' of the mode.

While we support the greater capacity that Metro-style lines allow, claims for greater frequency than heavy rail will be a matter for the operators to determine. Given the low patronage figures for the CBD Metro, it seems unlikely that such frequencies would be seen as cost effective for many years. By the figures presented in the EA, and in previous public statements, it is difficult to see how such a short line will meet its extraordinary costs.

For these reasons, we believe that the proposed CBD Metro fails to meet the operating definition for a metro-style line and loses a great deal of the mode's intrinsic value. EcoTransit Sydney recommends that metro-style operations (high frequency) be developed in more appropriate areas of the existing CityRail network.

## **Cost Issues**

We are advised that the proposal is still largely conceptual, and that research on the placement of stations and associated infrastructure, as well as the issues surrounding the construction of tunnels is incomplete. It is, therefore, difficult to understand whether the stated cost of 5.3 billion dollars is a realistic assessment of the proposal's final cost. However, even at a conceptual level, this figure represents a very significant investment in a **duplication** of the existing public transport network.

The CBD Metro's extremely high per kilometre cost would have the perverse effect of making future stages of the metro network a higher funding priority than cheaper and more cost effective extensions to the CityRail network. Having committed such an enormous proportion of the NSW capital budget to build a stand-alone link, from Central to Rozelle, immense pressure will be placed on the budgetary process to ensure that the metro network was extended to avoid the appearance of it being a "white elephant."

EcoTransit Sydney believe that this funding, if available, should be directed towards a range of more cost-effective measures that will significantly improve the capacity of the public transport network as a whole.

## **Integration Issues**

Numerous public statements have been made to the effect that the CBD Metro and later metro lines would be privately financed and run at a significant premium. Integration of the metro lines would rest largely on timetabling and on the introduction of the proposed T-Card.



### **Ticketing**

The longer lead times on the metro projects might provide some hope that this will come to pass, however progress to date does not reassure us. It is also our understanding that the T-Card system is intended to operate with a flag fall charge when a user changes mode. Will users who are forced to change modes as a result of changes to the CityRail network be charged for the privilege of doing so?

### **Station Access Charges**

EcoTransit Sydney understands that an 'access surcharge' is likely to be implemented, as is the case with the Airport Link. It should be unnecessary for anyone to have to point out that such a fee would have an adverse impact on patronage. Commuters resent having to purchase and carry two levels of ticketing for weekly commuting purposes, and will be disinclined to use any Metro service that allows this state of affairs to occur.

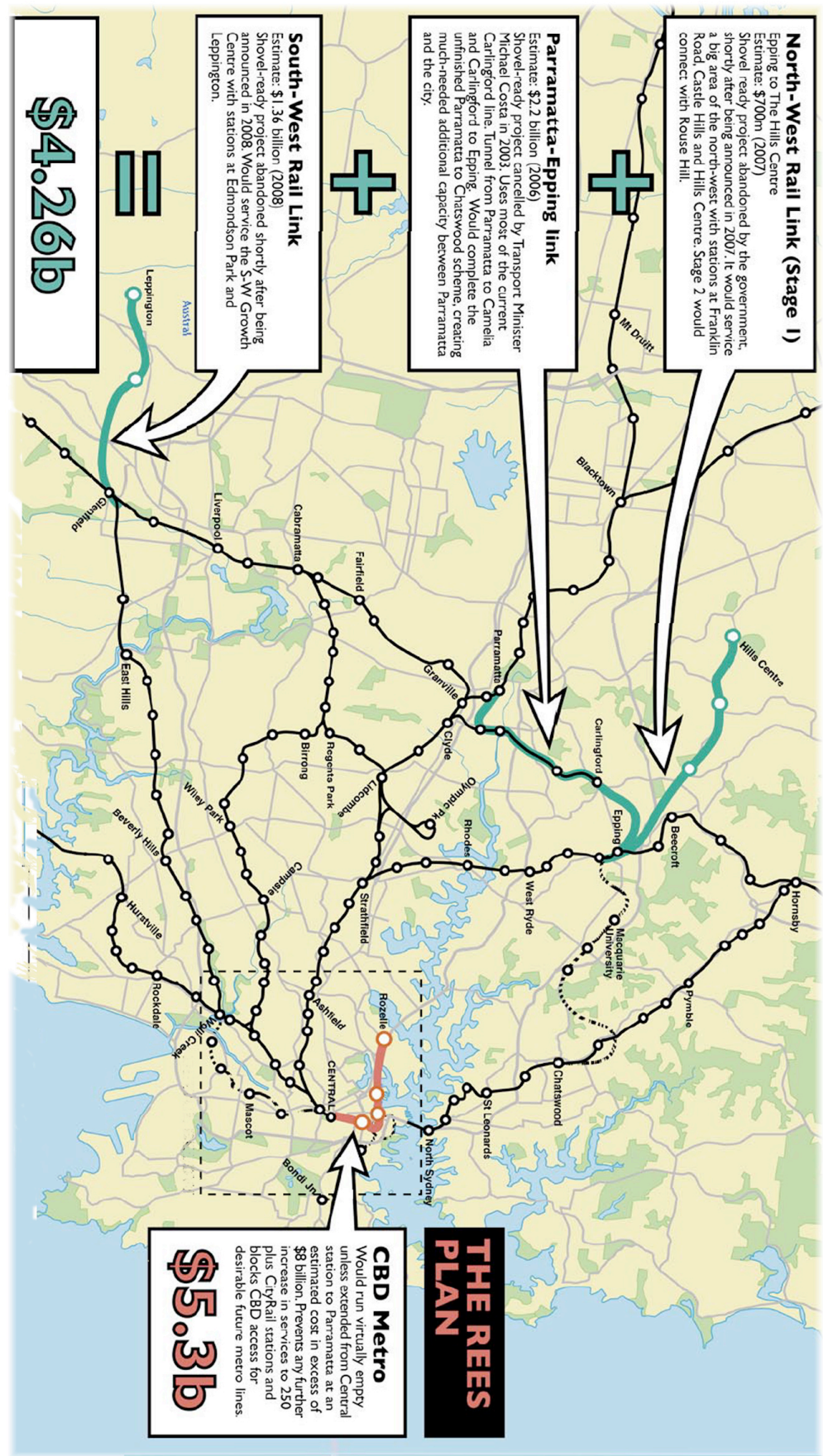
### **Opportunity Costs**

With limited funds available for improving Sydney's transport infrastructure, each and every project must be assessed against the need to provide a minimum level of public transport access for all parts of Sydney. At a cost of an estimated \$5.3 billion, providing a duplication of existing bus services in the Victoria Rd Corridor can only be considered as a gross misallocation of scarce public resources. The CBD Metro proposal takes the place of the North West Metro proposal, which overturned the long-planned North West heavy rail line. Given that there is currently no intention to provide public transport services to the people of Western Sydney and the Hills region, which continue to grow on the back of promises that public transport access would be provided, it is difficult to see how the CBD Metro can be justified.

EcoTransit Sydney believe that a better option would be to return to the shovel ready projects that have been delayed by poorly conceived plans for metro services. Two high-value alternative projects stand out – Stage 1 of the North-West Rail Link and the South-West Rail Link. Both are "shovel ready". Both would integrate easily and directly with the existing CityRail network. And both could be delivered in a fraction of the time and expense required for the CBD Metro.

Also shovel-ready is the Parramatta to Epping link which would use part of the existing Carlingford line, enhancing CityRail services for communities north of Parramatta.

The diagram (below) demonstrates the contributions made by the proposed CBD Metro and the proposals favoured by EcoTransit Sydney.



As noted in the diagram (above), the Parramatta-Epping leg of the Parramatta-Chatswood line was last costed, in 2006, at \$2.2 billion. This missing link could be built for a fraction of the \$8.1 billion estimate of the proposed all-underground West Metro, and would provide extra east-west capacity years before the West Metro could be completed.

The combined cost of these three projects would be \$4.26 billion. All would get immediate and strong patronage, whereas the CBD Metro would run almost empty unless a further \$8 billion was spent on the West Metro.

At a time when the existing CityRail network has serious overcrowding issues in the weekday peak periods, the completion of the projected North West heavy rail link will have a positive impact in relieving congestion on the Main Western line. For example, commuters from the north-west will no longer need to join existing Emu Plains and Richmond services to commute to the major business centres of Sydney (CBD), North Sydney, St Leonards or Chatswood.

Furthermore, integration with the Epping to Chatswood line, including completion of the “missing link” between Parramatta and Epping via Carlingford, will significantly lift patronage on the Epping to Chatswood line, further boosting the return on investment on the line.

In this way, completion of the North West rail link will have a similar positive impact on the CityRail network and the travel patterns of its customers to that of the completion of the East Hills to Glenfield rail link two decades ago, which was also completed with full government funding.

## **Conclusion**

For the above reasons, EcoTransit Sydney argues that the CBD Metro proposal should not be approved. It should be abandoned in favour of the long-planned heavy rail proposals for the Metropolitan Railway Expansion Project, the South West heavy rail link, North West heavy rail link, and for completion of the Parramatta-Epping link.

While we support the greater capacity that Metro-style lines allow, claims for greater frequency than heavy rail will be a matter for the operators to determine – and given the low patronage figures for the CBD Metro, it seems unlikely that such frequencies would be seen as cost effective.

It is also not clear that the proposal represents a realistic assessment of the transport requirements of Sydney. It certainly does not address the needs of rapidly expanding housing developments in the North West and South West of Sydney.

The CBD Metro represents a delay to much-needed capacity expansion on the existing CityRail system both through its absorption of public funds and through the longer timeframe for completing such projects. It also represents a huge increase on costs for improvements to the public transport network. Most importantly, the first two

stages demonstrate a clear intention to compete with existing transport systems rather than expanding the reach of system as a whole.

The advanced stage and comprehensiveness of the planning for the North West, South West and Parramatta- Epping rail links (and associated works) makes these projects far more cost-effective, and timely additions to the transport network as a whole.

EcoTransit Sydney's position is that the project application to construct the CBD Metro should be rejected. The Department of Planning should withhold its consent for the project and formally advise the Minister for Planning to this effect.