

Chapter 3

Analysis of submissions



3. Analysis of submissions

3.1 Overview of submissions

The Planning Secretary received 128 submissions during the exhibition of the project and provided copies of the submissions to Transport. The submissions received during the exhibition period were from the following:

- four submissions from public agencies, consisting of three from local councils and one from another government agency
- 90 submissions from members of the public
- 34 submissions from submitters registered as organisations (including special interest groups).

In addition, seven NSW Government agencies provided agency advice. The submissions and agency advice are available to be viewed on the Department of Planning and Environment's Major Projects website:

[Parramatta Light Rail Stage 2](#).

Of the submissions received, 30 submitters (24 per cent) registered support for the project, 35 submitters (27 per cent) registered an objection to the project and 63 submitters (49 per cent) registered a comment on the project.

Each submission has been examined individually to analyse how the submission relates to groups, people, and stakeholders in the community and to understand the issues raised. Section 3.2 describes how the submissions were analysed. Section 3.3 provides a breakdown of the submissions received, including the numbers from different types of submitters and locations, and a summary of the key issues raised.

The issues raised in each submission have been extracted and collated into categories, and corresponding responses to the issues have been provided in Chapters 5 to 8 of this report.

A submissions register is provided in Appendix A of this report. The register identifies the submission ID numbers and where in this report the issue/s raised in submission/s are addressed.

3.2 Approach to analysing submissions and agency advice

3.2.1 Issue categorisation

Each submission was reviewed, and the issues raised were summarised, categorised and grouped. The analysis of submissions involved identifying the issues raised and grouping the issues into the following five main issue types identified by the *State significant infrastructure guidelines – preparing a submissions report* (DPIE, 2022a):

- the project
- procedural matters
- environmental, social and economic impacts
- project justification and evaluation
- issues beyond the scope of the project.

Each type of issue was then categorised into key issues (e.g. design features, noise and vibration) and sub-issues (e.g. impacts on parking, location and need for stops) and detailed issue categories, which were based on the information and environmental aspects considered by the EIS. This provided an understanding of the frequency of the issues that were raised and the key areas of concern.

3.2.2 Review of public agency submissions and advice

The agency submissions and advice were reviewed, and the issues raised in each submission were summarised, broadly according to the order and headings provided in each submission (where such headings were provided). In some instances, related issues have been grouped under a single heading. The issues raised in each submission/advice, and responses to these issues, are provided per submitter in Chapters 5 (Response to NSW Government agency submissions and advice) and 6 (Response to council submissions) of this report. Where relevant, input to the responses was sought from the technical specialists who assisted with preparing the EIS.

A breakdown of agency submissions, including the key issues raised, is provided in section 3.3 below.

3.2.3 Review of community submissions

Submissions from members of the public and organisations are referred to as ‘community’ submissions for the purposes of the report. An assessment of each submission was undertaken, with the submissions individually reviewed to understand the issues raised. The analysis involved identifying the issues raised and categorising them into main issue type, key issues and sub-issues.

The following submitters are considered to be key organisations for the submission response process given their level of interface with the project and the design and construction planning process:

- Australian Turf Club
- Royal Agricultural Society of NSW
- utility owners.

The issues raised by the above submitters, and responses to these issues, are provided per submitter in Chapter 7 (Response to key organisation submissions) of this report.

Responses to the issues raised in other community submissions are provided in Chapter 8 (Response to community submissions), according to the issue categories. A response has been provided to each grouped issue summary, which may be relevant across a number of submissions.

Where relevant, input to the responses was sought from the technical specialists who assisted with preparing the EIS.

Each issue identified in Chapters 7 and 8 is presented as a summary of the issues raised by individual submissions. This means that, while the exact wording of a particular submission may not be present in the summary of the issue, the intent of issues raised has been captured.

A breakdown of community submissions, including the key issues raised, is provided in section 3.3.

Appendix A (Submissions register) contains a table identifying community and organisation submissions using the submission identification numbers provided to submitters by the Department of Planning and Environment. The table presents, for each submission, a cross reference to where the key issues raised have been addressed in Chapters 7 and 8 of this report. Further detail on issues raised in each submission, including background, contextual information and full submissions, is provided in the detailed submissions available via the Department of Planning and Environment’s Major Projects website ([Parramatta Light Rail Stage 2](#)).

3.3 Breakdown of submissions

3.3.1 Submissions received

Public agencies

Four submissions were received from the following public agencies:

- City of Parramatta Council
- Council of the City of Ryde
- Cumberland City Council
- NSW Land and Housing Corporation.

Community

A total of 124 submissions were received from the community, consisting of members of the public and organisations. A breakdown of submitter types is provided in Table 3.1. A breakdown of the submitters' location (suburb) for public submissions is provided in Table 3.2. As shown in Table 3.2 the majority of public submissions (58 submissions, 64 per cent) were received from submitters located in suburbs along the project alignment.

Table 3.1 Breakdown of submissions received

Submitter category ¹	Number of submissions received	Types of submitters	Total submitters
Public	90	Members of the public – individuals/community members	90
Organisations ²	33	Special interest groups, including peak bodies, local community groups and business representative groups	16
		Utility companies	4
		Property owners and businesses (includes businesses operating from properties along the alignment and developers)	10
		Major landholders ²	2
		University	1
Totals	123²		123

Notes: 1. As selected by submitters when uploading their submissions to the Department of Planning and Environment's Major Projects website
 2. Two submissions were received from Royal Agricultural Society of NSW. There were recorded and have been addressed by this report as one submission.

Table 3.2 Submitter locations for public submissions

Location (suburb)	Number of public submitters from location
Ermington	8
Rydalmere	6
Melrose Park	13
Wentworth Point	16
Sydney Olympic Park	12
Lidcombe	3
Total for suburbs along route	58

Location (suburb)	Number of public submitters from location
Other suburbs in the Parramatta, Ryde or Cumberland LGAs	15
Other suburbs in Sydney	16
Not indicated	1
Total other locations	32
Total public submissions	90

3.3.2 Summary of issues raised

Public agency submissions

A breakdown of the main issue types for the issues raised in agency submissions is shown in Figure 3.1. This figure shows that the majority of issues raised related to the potential impacts of the project (45 per cent), and issues about the project itself (42 per cent). A further breakdown of these issues is provided below.

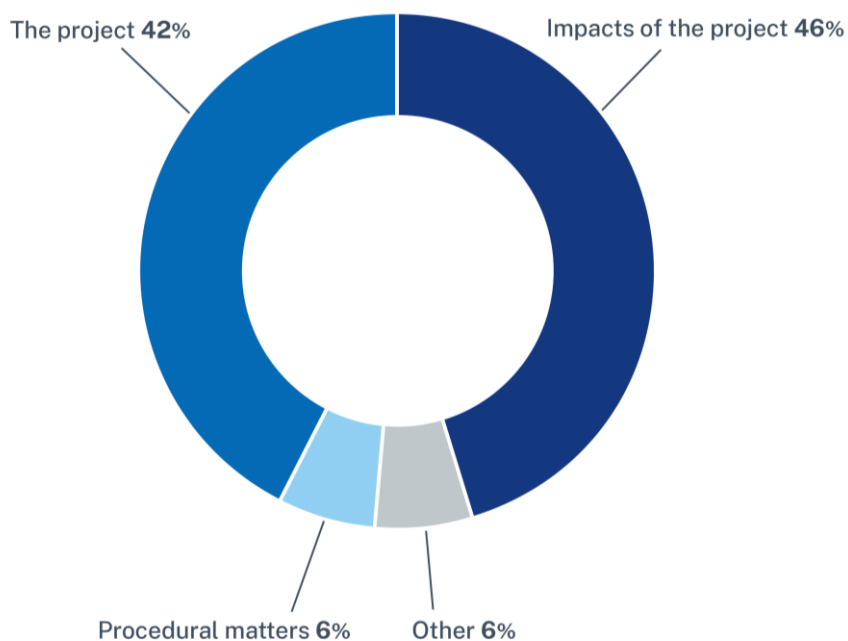


Figure 3.1 Main issue types raised in public agency submissions

Impacts of the project – issues raised in public agency submissions

A breakdown of the potential impact issues raised in agency submissions is shown in Figure 3.2. This figure shows that the most frequently raised impact issues are:

- transport and traffic impacts (40 per cent)
- noise and vibration impacts (27 per cent)
- land use and property impacts (13 per cent).

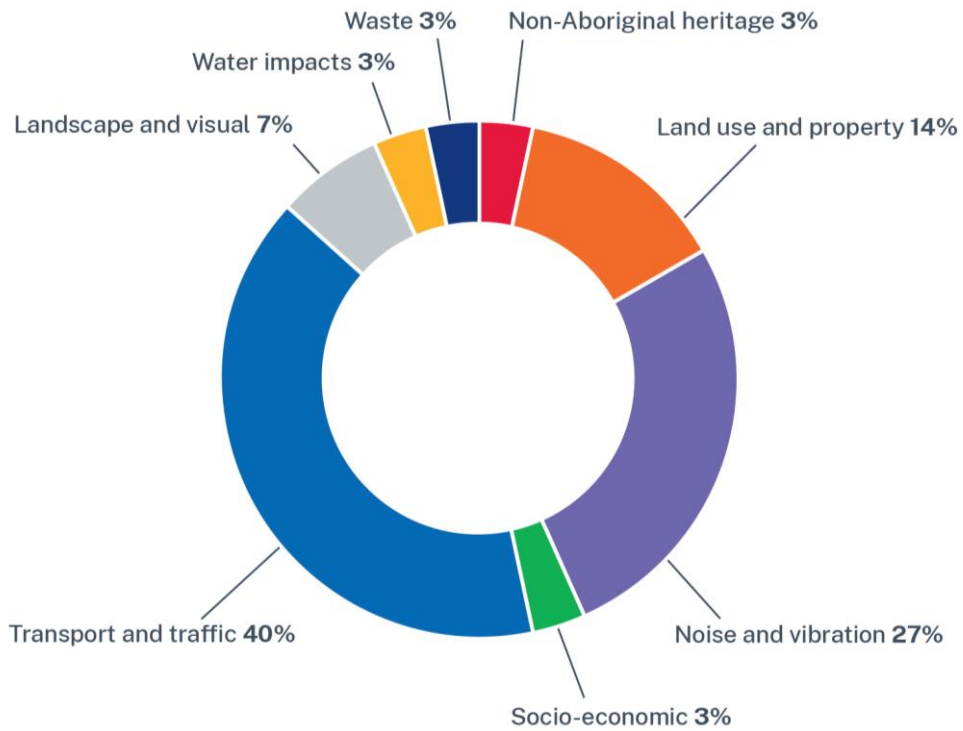


Figure 3.2 Key impact issues raised in public agency submissions

A more detailed breakdown of the transport and traffic impact issues (see Figure 3.3) shows that the majority of sub-issues raised consisted of operation impacts (42 per cent) followed by construction impacts (33 per cent).

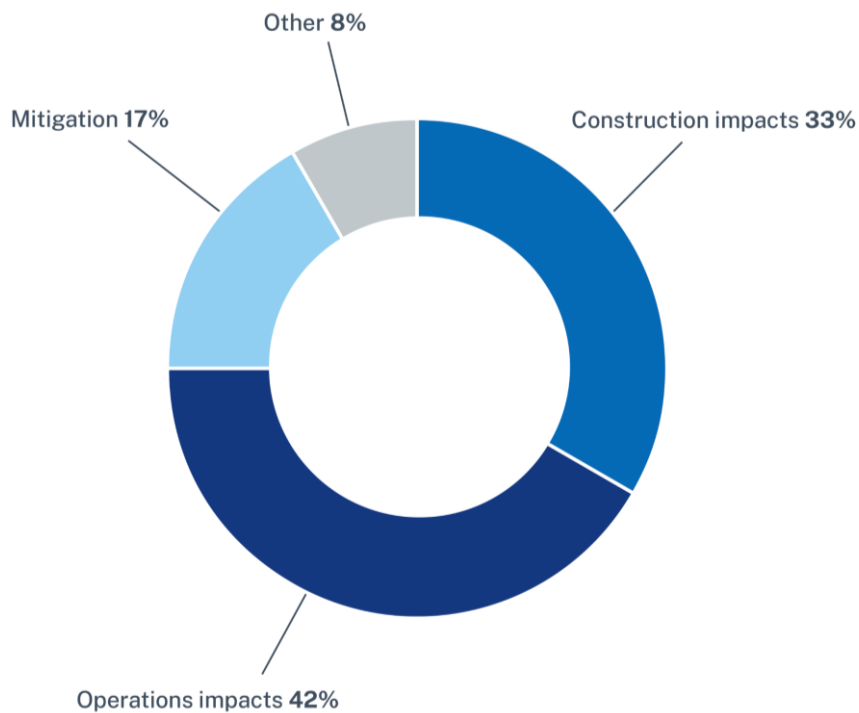


Figure 3.3 Transport and traffic issues raised in public agency submissions

The project – issues raised in public agency submissions

A breakdown of the key issues raised about the project in agency submissions is shown in Figure 3.4. This figure shows that the most frequently raised project issues are design features issues (75 per cent of project issues).

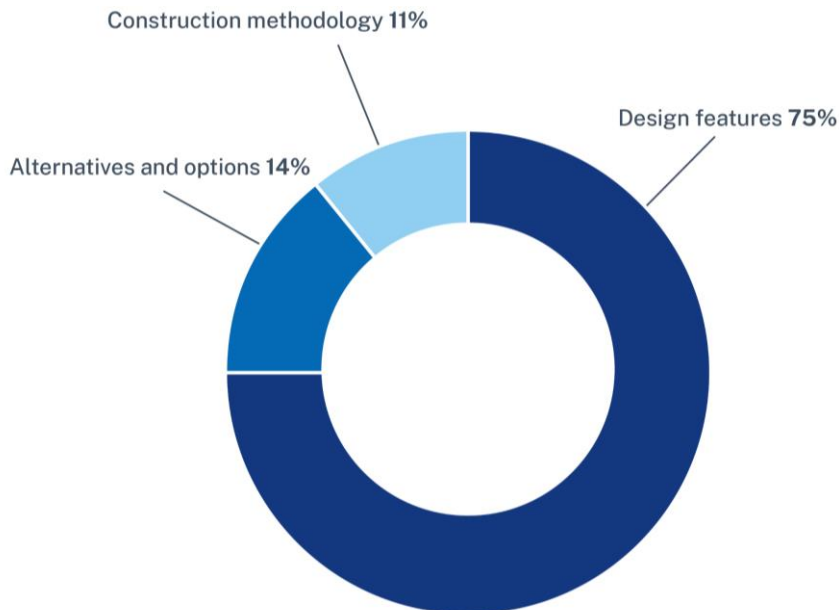


Figure 3.4 Key project issues raised in public agency submissions

A more detailed breakdown of the design feature sub-issues raised (see Figure 3.5) shows that the most frequently raised design feature issues consisted of:

- issues about the location of Wentworth Point bridge (33 per cent)
- issues about track form and alignment and other issues (both 19 per cent)
- issues about public domain and open space (14 per cent).

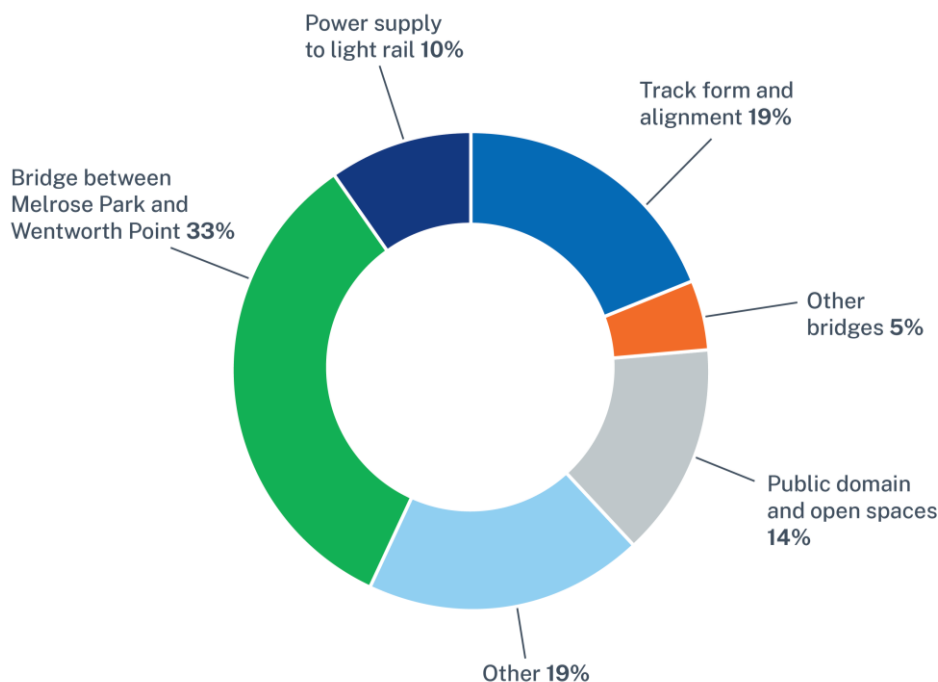


Figure 3.5 Design feature issues raised in public agency submissions

Further information about the issues raised in agency submissions, and responses to the issues raised, is provided in Chapters 5 and 6 of this report.

Community submissions

A breakdown of the main issue types for the issues raised in community submissions is shown in Figure 3.6. This figure shows that the majority of issues raised related to the project (50 per cent), followed by issues raised about the impacts of the project (33 per cent). A further breakdown of these issues is provided below.

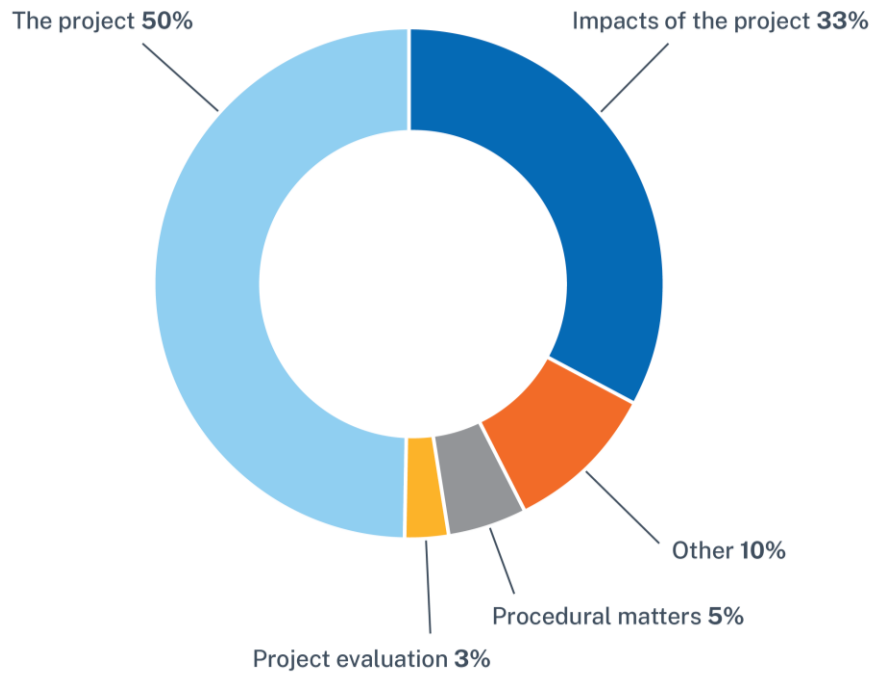


Figure 3.6 Main issue types raised in community submissions

The project – issues raised in community submissions

A breakdown of the key issues raised about the project in community submissions is shown in Figure 3.7. This figure shows that the majority of project issues raised are design feature issues (57 per cent) followed by alternatives and options issues and construction methodology issues (both 21 per cent).

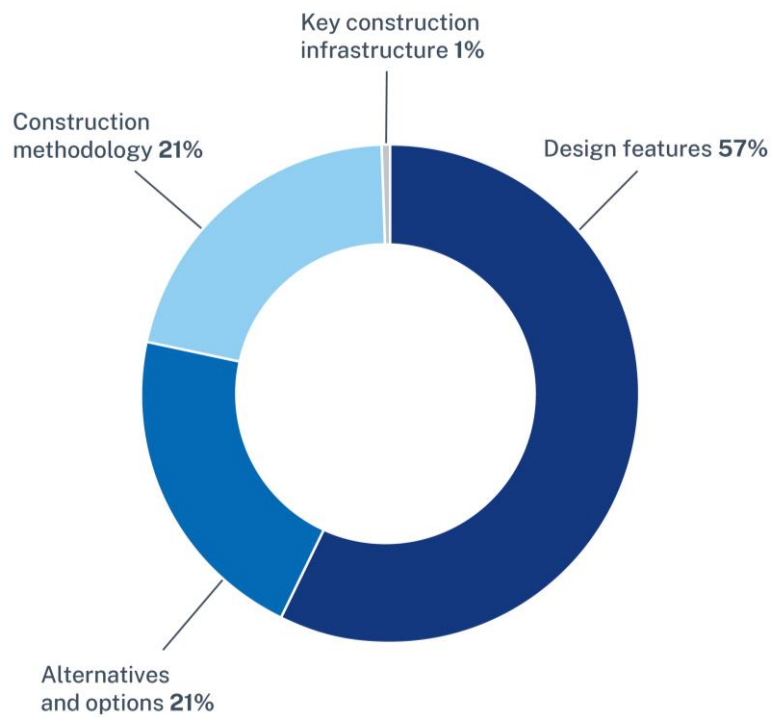


Figure 3.7 Key project issues raised in community submissions

A more detailed breakdown of the design feature sub-issues raised (see Figure 3.8) shows that the most frequently raised design feature issues consisted of:

- issues about the bridge between Melrose Park and Wentworth Point (22 per cent)
- issues about the need for, design and location of stops (18 per cent)
- issues about the track form and alignment (15 per cent).

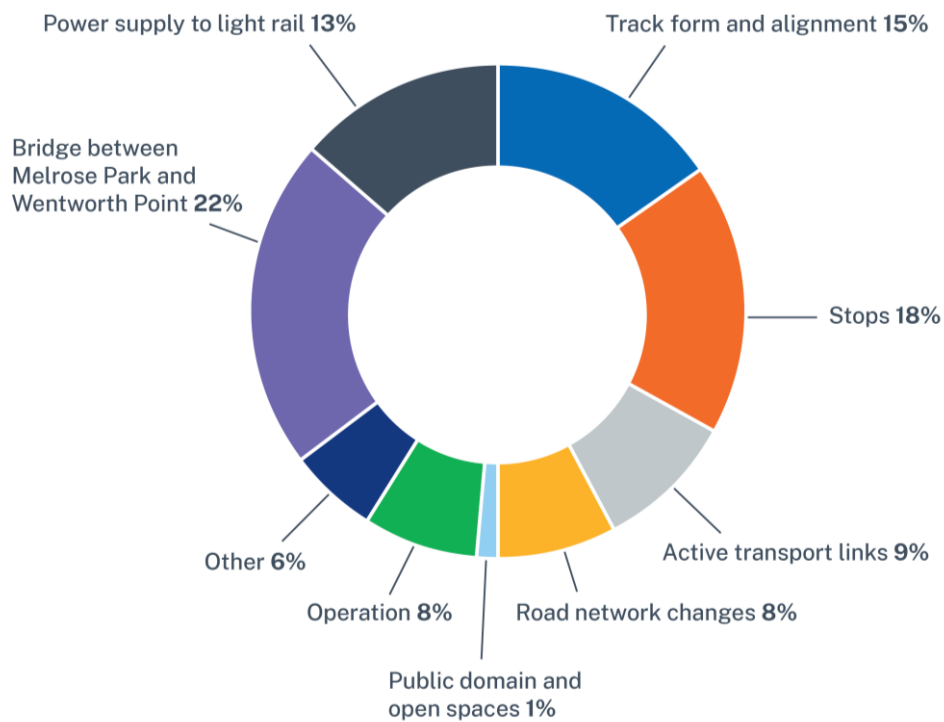


Figure 3.8 Design feature issues raised in community submissions

Impacts of the project – issues raised in community submissions

A breakdown of the potential impact issues raised in community submissions is shown in Figure 3.9. This figure shows that the most frequently raised key issues areas are:

- transport and traffic issues (30 per cent)
- land use and property issues (27 per cent)
- noise and vibration issues (16 per cent).

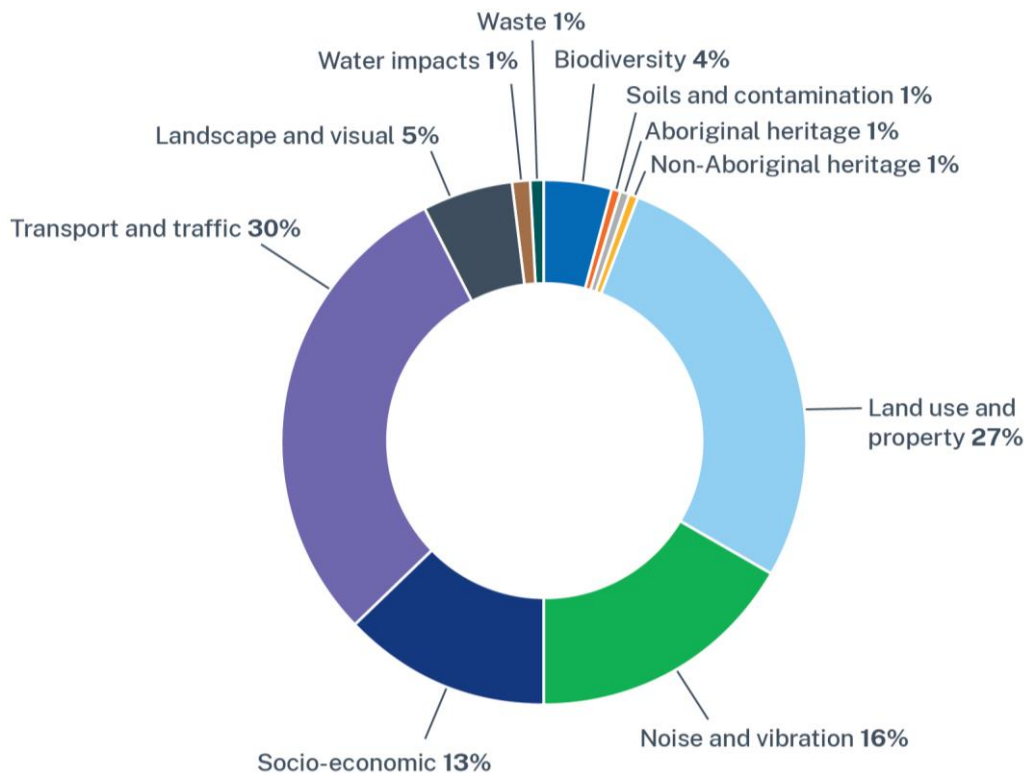


Figure 3.9 Key impact issues raised in community submissions

A more detailed breakdown of the transport and traffic impact issues (see Figure 3.10) shows that the most frequently raised issues consisted of:

- issues about impacts of operations (35 per cent)
- issues about the traffic and access impacts of closing Ermington Boat Ramp in terms of access to other ramps (20 per cent)
- queries and suggestions about mitigation measures (20 per cent).

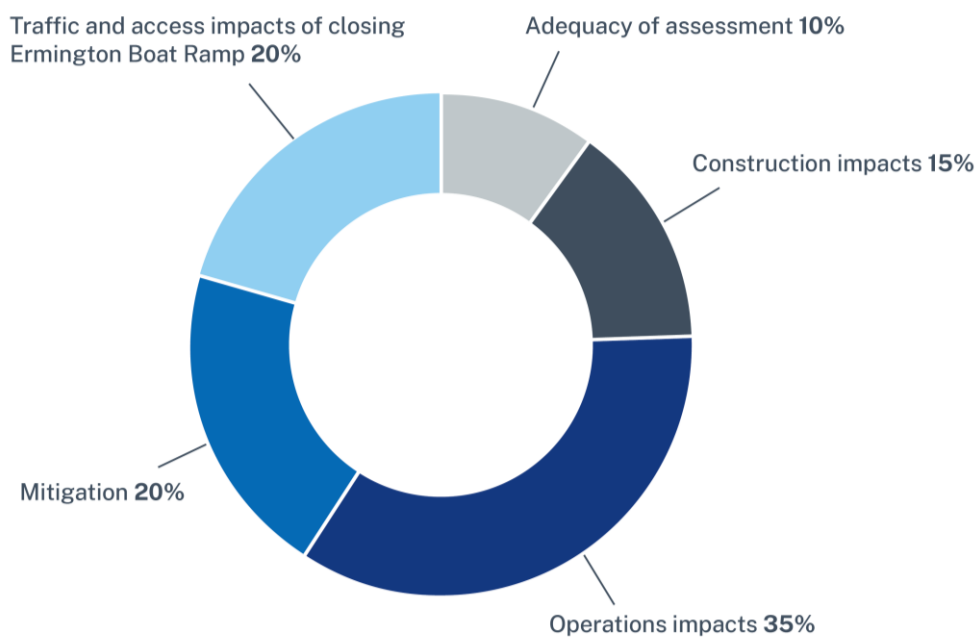


Figure 3.10 Transport and traffic issues raised in community submissions

A more detailed breakdown of the land use and property impact issues (see Figure 3.11) shows that the most frequently raised issues consisted of:

- issues about the project’s land requirements and acquisition impacts (49 per cent)
- issues about impacts on properties during construction (24 per cent)
- issues about impacts on properties during operation (18 per cent).

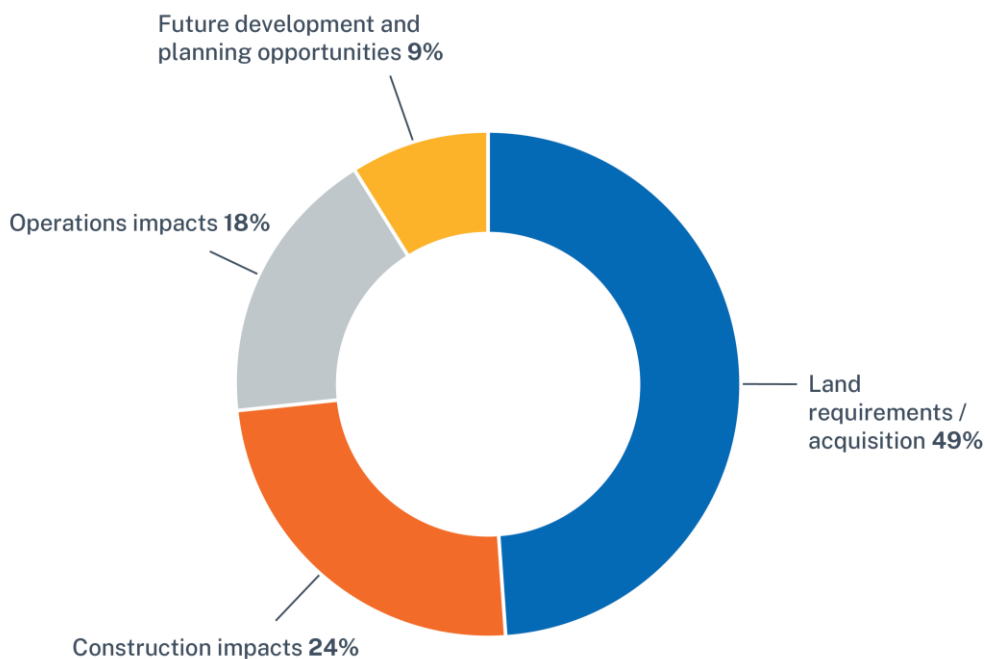


Figure 3.11 Land use and property issues raised in community submissions

Most common sub-issue categories raised in community submissions

A breakdown of the most common sub-issues categories raised in community submissions (categories with more than 10 issues raised by individual submitters) is provided in Table 3.3.

Given that most submissions raised more than one issue and that many submissions raised the same issue more than once, the number of issues identified is greater than the total number of submissions received.

Table 3.3 also provides a reference to where these issues are summarised in Chapter 8 of this report (Response to community submissions) for further information.

Further information on the issues raised in community submissions, and responses to the issues raised, is provided in Chapters 7 (Response to key organisation submissions) and 8 (Response to community submissions) of this report.

Table 3.3 Most common issues raised in community submissions

Issue group	Key issue	Sub-issue category (issue detail)	Number of time issue was raised	% of total issues raised	Report reference ¹
The project	Design features	Location and need for stops	17	3%	8.2.2
Impacts of the project	Socio-economic impacts	Social impacts of closing Ermington Boat Ramp	16	3%	8.10.1
The project	Design features	Preferred location for the bridge between Melrose Park and Wentworth Point	16	3%	8.2.3
The project	Construction methodology	Concerns regarding the closure of Ermington Boat Ramp (justification and duration queries)	16	3%	8.3.3
The project	Design features	Requests and support for green track	14	3%	8.2.1
The project	Construction methodology	Requests to expedite the delivery program	14	3%	8.3.1
The project	Alternatives and options	Wentworth Point alignment	13	3%	8.4.2
The project	Design features	Requests for wire-free power supply	13	3%	8.2.7
The project	Alternatives and options	Project corridors beyond Sydney Olympic Park (incl to Lidcombe Station)	10	2%	8.4.1
Impacts of the project	Land use and property	Property specific acquisition clarifications and justification requests	10	2%	8.9.1 and 8.9.2
Impacts of the project	Transport and traffic	Traffic and access impacts of closing Ermington Boat Ramp in terms of access to other ramps	10	2%	8.6.1

Note: 1. Provides a reference to the section where the majority of issues raised in community submissions are summarised in Chapter 8, noting that some are also raised by key organisation submissions (summarised in Chapter 7).