

IMPACT OF PROPOSED CONSTRUCTION OF HUNTER INDOOR SPORTS CENTRE (SSD-65595459) (INDOOR BASKETBALL STADIUM) ON CROWN RESERVE PUBLIC OPEN SPACE, NEW LAMBTON NSW

Introduction

This proposed development should be rejected. It substantially and deleteriously affects a large public high school (more than 1,166 students, including 71 Aboriginal students and 117 staff); local and district residents; football (soccer) and cricket clubs, coaching clinics, active and passive users, infant, primary and teenage children playing before and after school, and users of the school hall. The subject site is in the suburb of New Lambton, in the state seat of Wallsend.

A politicised and controversial proposal

On 22 March 2023, three days before the 2023 State election, an Independent MP and a member of the Council of the City of Newcastle ('Council') greatly surprised Hunter Region residents by announcing that a huge Newcastle Basketball Association ('the Association', a private entity) 12-court indoor basketball stadium and 2,000-seat indoor show court is to be constructed on Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2) at New Lambton NSW, immediately adjacent to the fast-growing Lambton High School (LHS). The complex, including facilities and car parking, will entirely subsume Wallarah Park, Crown land for which Council is Crown Land Manager. The park is composed of three well-used public ovals. The complex itself, to be the largest in NSW, is to be owned by the Association. The site is in a desirable, well-established, century-old residential area. The proposal is classified as State Significant Development by the Department of Planning and Environment as planning authority for the Association's DA. Very strong local opposition, the extent of which in the local government elections of September 2024 substantially altered the composition of the elected Council, has led the Association to change the nomenclature of the proposal to suggest that it will benefit several Hunter Region sports. Nevertheless, the submitted plans demonstrate that the proposed stadium remains very much a creature of basketball in general and of Newcastle Basketball Association in particular.



Figure 1. The stadium site at Wallarah Park, in a long-established residential area. Immediately to the north is Lambton High School (2022 enrolment: 1,166 students and 117 staff); to the east are McDonald Jones Stadium (capacity: 33,000) and Newcastle International Hockey Centre (capacity 3,000); to the west are Alfred Edden Oval and its training field (fenced, reserved, and excluded from the proposal).



Figure 2. The subject site (Walarah Park, including Blackley Oval and Wallarah Ovals No.1 and No.2), used as a playground by Lambton High School (immediately left, showing Covered Outdoor Learning Area). Land in the foreground (boundary shown by dark-coloured pathway across the image) is fenced, reserved to a large soccer football club, and not part of the stadium proposal. The International Sports Centre (McDonald Jones Stadium, Hockey Centre, Knights Centre of Excellence, harness racing track and vacant land) are beyond tree-lined Turton Road; a recently built pavilion is at right. Should the huge basketball stadium proceed, this whole area will go under concrete, ruining the whole amenity.



Figure 3. Wallarah Park from Turton Road. Lambton High School, together with its Covered Outdoor Learning Area, is visible immediately behind the fence to the right. The proximity of the park to Lambton High School, and its dependence on it, is shown. Interestingly, Council, anxious that the land not be identified as parkland, has recently removed the 'Walarah Park' sign visible near the footpath; yet its status remains.

Both a member of the previous government and the member of Council above referred to share great enthusiasm for Newcastle basketball and the Association. This, together with the involvement of an Independent MP acting outside their seat, may account for the highly politicised and personal, eleventh-hour stadium announcement, which left numerous stakeholders 'shocked' in more ways than one. Incredibly, and for no good reason, the Hon. Member for Wallsend was not informed of any aspect of the proposal, guaranteeing maximum political impact on election eve.

A 'shock' proposal, made in haste

Despite being on the very cusp of the election, there was no public or stakeholder consultation.

<https://www.newcastleherald.com.au/story/8131622/sporting-groups-shocked-new-stadium-will-replace-two-ovals/>

This was both inappropriate and contrary to the principal of representative government. The announcement took the form of a *fait accompli*, as funding had allegedly been promised by the (then) state government:

<https://www.bns.wa.gov.au/news/a-new-30-million-basketball-stadium-to-be-built-in-newcastle/>

<https://www.newcastleherald.com.au/story/8129751/30-million-regional-basketball-stadium-plan-moved-to-newcastle/> <https://www.instagram.com/p/CqEFGgPS92k/>

Inadequate funding and wedge politics

This proposed funding outlined above has since been shown to be absolutely inadequate to the now-projected cost:

<https://www.newcastleherald.com.au/story/8793669/new-lambton-basketball-stadium-costs-soar-to-82-million/>

Accordingly, it is now proposed that the stadium should be constructed in three stages. The 'spin' associated with this idea is threefold: to reduce public opposition by taking away the park in three tranches, rather than in one; temporarily preserving some of the land currently used as public open space by the extensive range of stakeholders listed later in this submission; and attempting to minimise, or distract from, the substantial legal and planning barriers to the proposal. Despite this 'spin', the negative effects of the proposal remain: the whole of the open space will be taken, whether in one phase or three. If the proposal lacks merit now, it will lack merit later, and the idea of construction is merely the thin edge of the wedge. When and if the proposal is considered for planning approval, the entire scheme, incorporating all three stages, should be considered at the outset.

Public consultation should have been conducted before the strategically timed, election eve announcement. The absence of consultation seemingly demonstrates that those responsible for the proposal intend that it proceed, whatever stakeholders think and how they are affected. Some responsible for the announcement, having perceived problems with the hastily conceived project, are now 'ducking for cover' and attempting to deflect criticism and debate by calling for comments to be directed to the Association, rather than to Council or Government as is every citizen's right. This is an example of public relations 'spin' taking the place of reasoned, timely and consultative decision making.

A 'foolish' proposal

A tremendous but far-fetched personal enthusiasm for basketball on the part of certain individuals, combined with frustration with the rejection of previous stadium plans for sites within the seat of Lake Macquarie, has resulted in a proposal both hastily announced and unsuitably located. The proposal is in fact an overnight reversal of state planning principles and Council's own adopted, site-specific, strategic plans and city-wide sporting fields policies.

It also conflicts with Council's recent statement that 'City of Newcastle [ie, Council] is committed to delivering [high] quality playgrounds and green spaces across Newcastle.': *Newcastle Weekly*, March 2024, p.9
<https://newcastleweekly.com.au/latest-issue/>

This statement is clear enough; why, then, would elements of Council propose to destroy Wallarah Park (Blackley and Wallarah Nos.1 and No.2 ovals) by constructing a huge basketball stadium on it? Well might the Hon. Member for Wallsend describe the proposal as 'foolish': <https://newcastleweekly.com.au/hornery-yes-to-new-basketball-stadium-but-no-to-proposed-site/> <https://www.newcastleherald.com.au/story/8456390/foolish-wallsend-mp-cricket-body-oppose-new-basketball-stadium-location/>

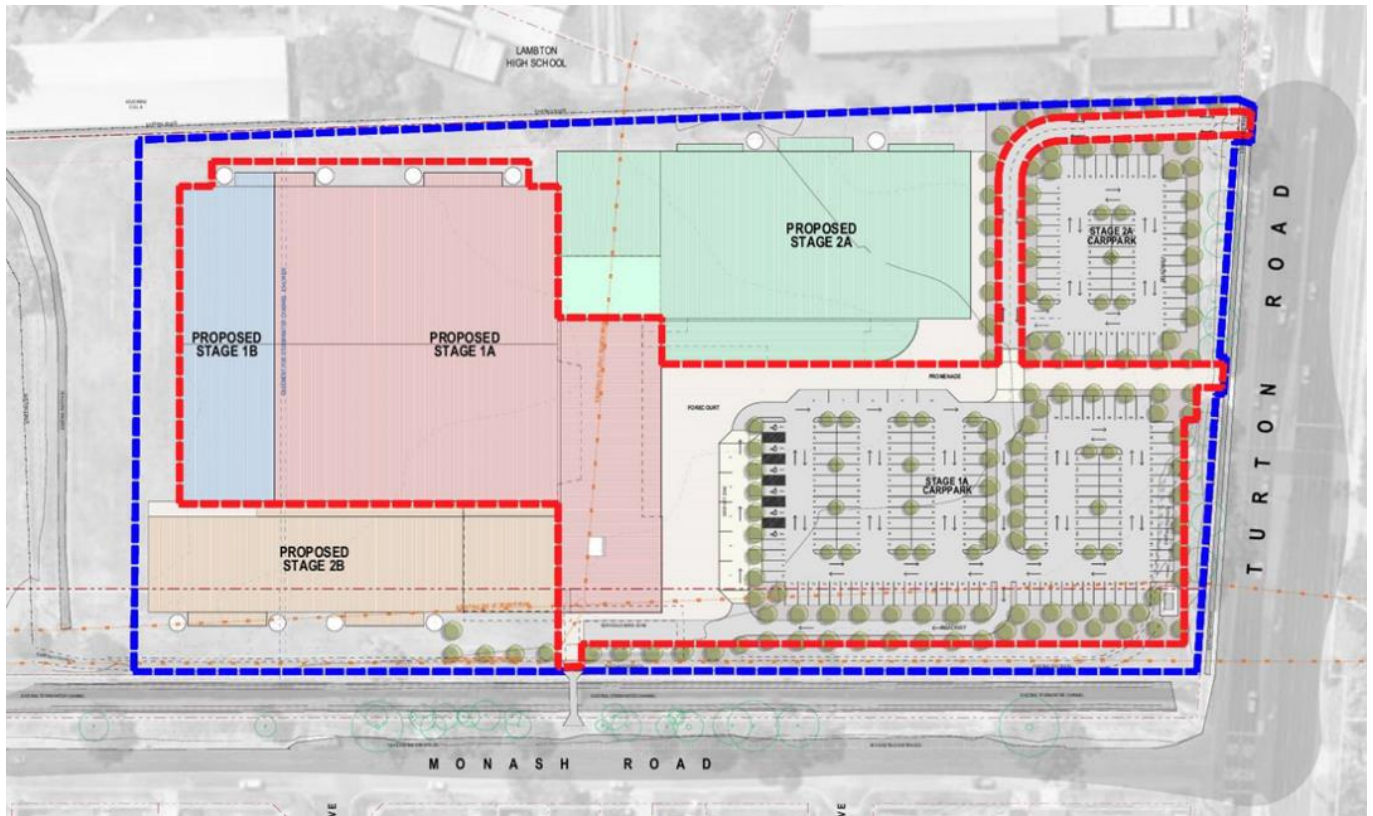


Figure 4. The proposed stadium. Lambton High School (2022 enrolment: 1,166; 117 staff), and residences, are immediately to the north (Covered Outdoor Learning Area on boundary). Narrow Monash Road, with large open stormwater drain, is to the south, beyond which are residences. Arthur Edden Oval is to the west. Note the complete eclipse of Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2) by the huge stadium complex, physically and psychologically dominating Lambton High School and leaving it with no emergency evacuation area and no real playground at all, leaving the school with very poor amenity indeed, affecting the physical and mental health of students and staff.



Figure 5. An architect's render of the proposed indoor stadium complex (roofs not shown), highlighting its huge scale, bulk and dominant character. Lambton High School (with its extremely cramped playground) and residences are immediately to the north; Monash Road and residences are to the south-east; busy Turton Road is to the north-west. The 2,000-seat show court is visible, together with a clearly inadequate car park amidst narrow residential streets. A large open stormwater drain runs along the southern tree line. The site is subject to flooding.

Background to the proposal

The first section of the current Newcastle basketball stadium at Broadmeadow, close to Broadmeadow railway station, was opened in 1969; extensive alterations and additions were undertaken in the 1980s. This stadium is now in need of further alterations and additions. In 2019, the Association stated its intention to relocate to a location in the seat of Lake Macquarie, hoping to retain 'three or four indoor courts at Broadmeadow' in the planned Hunter Sports and Entertainment Precinct [with multi-storey residential component] at Hunter Park (formerly District Park), within the Broadmeadow Regionally Significant Growth Area as identified in *Hunter Regional Plan 2041*:

<https://www.newcastlebasketball.com.au/wp-content/uploads/2019/03/Newcastle-Basketball-letter-to-members-25-03-2019.pdf>

In 2018, the Association proposed that a stadium be constructed on vacant Lake Macquarie Council land in the seat of Lake Macquarie at Hillsborough, near an inner-city bypass road: <https://shape.lakemac.com.au/indoor-sports> . In 2020, a Development Application was lodged: <https://www.newcastlebasketball.com.au/2020/06/20/homing-in-on-new-stadium/> On 9 May 2022, the application was rejected by the Hunter and Central Coast Regional Planning Panel (HCCRPP): <https://www.newcastleherald.com.au/story/7732482/hillsborough-basketball-stadium-proposal-refused/> On 11 May 2022, the Association proposed that the stadium be constructed near the planned Hunter Sports Centre (not to be confused with the planned Hunter Sports and Entertainment Precinct at Hunter Park) at Glendale, also in the seat of Lake Macquarie: <https://www.newcastleherald.com.au/story/7734048/glendale-now-the-focus-for-new-basketball-stadium/>

At that time, the Association's general manager was quoted on radio as saying 'We have been working with all the relevant state government organisations and Lake Macquarie City Council on the site at Glendale since the start of the year and it looks very promising. The problem with a project of this size is it will not work on the current site at Broadmeadow, and we don't fit into plans for the redevelopment of Hunter Stadium [known as McDonald Jones Stadium] so finding community land that can accommodate a facility of this magnitude is extremely difficult.' <https://www.2hd.com.au/2022/05/11/newcastle-basketball-stadium-on-the-move-but-not-where-they-planned/> Despite these statements, the Glendale proposal has not yet progressed.

The Association's statements prove three important points: (a) the Glendale site is 'very promising'; (b) a stadium would be of considerable 'size' and 'magnitude'; and (c) the Association, despite being a private entity, wishes to construct its self-owned facility on 'community land'.

A proposal of 'magnitude'

Questions must immediately be asked as to why a project of such 'size' and 'magnitude' should now be considered suitable for building on community land, namely Wallarah Park and its ovals; in a long-established residential community; and adjacent to a large public high school which daily uses the park as a playground and sporting space. Publicity suggests that it is proposed to host general events at the stadium, not merely sporting fixtures.

Certain it is that the proposed stadium is to be huge indeed, dominating its site and residential/educational surrounds. As public entry will not be 'as of right', but by permission of the Association (with club and entry fees), why should the facility be on public land (Walarah Park) and funded by the public, while alienating Wallarah Park, an asset which for over 100 years has been enjoyed by the people of Newcastle and the Lower Hunter Region?



Figure 6. Architect's render showing the first stage only of the proposed huge stadium from the residences along an oddly empty Monash Road. A strangely empty car park is also shown. The transport reality would be very different, with the immediate area already regularly overwhelmed by vehicles during sporting fixtures at the adjacent McDonald Jones Stadium, Hockey Centre and Alfred Edden Oval, with much illegal parking.

Conflict with state design policy

Wollarah Park (Blackley Oval and Wollarah Ovals No.1 and No.2) has for a century been public open space, to which entry is 'as of right', ie, unrestricted by fencing, admission fees, sporting memberships, organised sport, timetabling and the like. They meet the NSW Government Architect's definition of green space as "'open" (or not built upon) land that accommodates recreation or provides relief from the built environment.' (NSW Government Architect, *Draft Greener Places Design Guide*, 2020, p.10). It is a Premier's Priority to increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open, and public spaces by 10 per cent by 2023. (Ibid., p.5) <https://www.planning.nsw.gov.au/sites/default/files/2023-10/greener-places.pdf> Such land is scarce in inner Newcastle. NSW LGAs are fast losing public open space as part of an ongoing process of building on such land: <https://architectureau.com/articles/nsw-may-have-lost-20-of-its-open-space-over-10-years/>

Contrary to the Premier's Priority, the huge basketball stadium proposal would entirely alienate Wollarah Park, a 'quality green, open, and public space' within 10 minutes walk for present and future residents of Lambton-New Lambton and the planned Hunter Sports and Entertainment Precinct, which is itself to have thousands of residents in its multi-storey residential component. This would be an unacceptable outcome in terms of the Premier's Priority.

Conflict with Council of the City of Newcastle planning policies: one

The stadium proposal conflicts, too, with Council's own *Strategic Sports Plan* (adopted by Councillors on 8 December 2020), for which 'Consultation was undertaken with state and local sporting associations and clubs to gather insight on how the sporting facilities are valued and used by the community. The 10-year plan considers population growth across our City to ensure that we can meet existing and future needs...' <https://newcastle.nsw.gov.au/explore/parks/recreation-planning/key-strategies-for-open-spaces/strategic-sports-plan#:~:text=The%2010%2Dyear%20plan%20considers,netball%2C%20rugby%20league%2C%20rugby%20union>

This Strategic Sports Plan identifies Wollarah Park (the ovals) as a 'Centrally located venue with potential to increase utilisation', which Council should 'Include in [a] precinct plan for adjacent New Lambton Park, Wollarah Oval/ Arthur Edden/ Blackley Oval' to 'Develop a masterplan to guide redevelopment of this facility as a football centre of excellence (CoE) and to host National Premier League (NPL) competition games.' (*City of Newcastle Strategic Sports Plan*,

December 2020, p.31) <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan>

Moreover, the Strategic Sports Plan classifies Wallarah Park (Blackley and Wallarah Ovals No.1 and No.2) as 'Regional' within the hierarchy of sports facilities. 'Regional' is defined as 'Serves whole Council area and some regional demand' (City of Newcastle Strategic Sports Plan: Supporting Resources: Vol 2: Sports Facilities Hierarchy August 2020, pp.1, 5). <https://newcastle.nsw.gov.au/Newcastle/media/Documents/Engagements/Current/CoN-Strategic-Sports-Plan-Supporting-Resources-Vol2.pdf>. Commensurate with this classification, Council has recently constructed a large amenities block serving Wallarah Park. This recent and expensive building would be demolished if the basketball stadium proposal is accepted.

Conflict with Council of the City of Newcastle planning policies: two

The proposed huge stadium plan conflicts, also, with Council's Parkland and Recreation Strategy, which identifies the need for much additional public open recreational and sporting space within the LGA by 2026, two short years away. This describes the need for an additional 15 local playgrounds; an additional 6 district playgrounds; an additional regional playground; and an additional 36 sports fields. (City of Newcastle Parkland and Recreation Strategy, Table 6: Numerical comparison of Newcastle recreation facilities to draft provision rates of provision, p.36). [https://newcastle.nsw.gov.au/Newcastle/media/Documents/Strategies,%20Plans%20and%20Policies/Strategies/Parkland and Recreation Strategy - Background Appendices.pdf](https://newcastle.nsw.gov.au/Newcastle/media/Documents/Strategies,%20Plans%20and%20Policies/Strategies/Parkland%20and%20Recreation%20Strategy%20-%20Background%20Appendices.pdf)

Absence of public consultation

The stadium announcement occurred without consultation, or even communication, with the Hon. Member for Wallsend; some Councillors; local residents (including Lambton Residents' Group); and other stakeholders, including football (soccer) and cricket clubs (including Newcastle District Cricket Association and Western Suburbs Junior Cricket Club), coaching clinics, active and passive users, including primary and high school children playing before and after school: <https://www.newcastleherald.com.au/story/8456390/foolish-wallsend-mp-cricket-body-oppose-new-basketball-stadium-location/> https://issuu.com/hunterlocal/docs/thelocal_january2024_issuu <https://www.nbnnews.com.au/2024/01/08/residents-fight-newcastle-basketball-stadiums-proposed-location/>



Figure 7. Stakeholders of Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2) include Lambton High School (each school day), the local junior cricket and soccer football clubs and some senior users, together with active and passive casual users and district and local residents who enter the park as of right. Should the huge stadium progress, the whole area shown is to be subsumed beneath tarmac and multi-storey structures. McDonald Jones Stadium (capacity 33,000), at right, already generates unsustainable levels of vehicular movements and parking.

Extraordinarily negative effect on Lambton High School: one

Very significantly, Lambton High School ('LHS') relies on Wallarah Park (Blackley Oval and Wallarah No.1 and No.2 ovals) to make up for its permanent, and severe, shortage of playground space. This lack of consultation has subsequently been denied by some within Council, elements of which are attempting to deflect criticism onto other parties; but the facts remain despite subsequent Council public relations 'spin', of which the following are examples: <https://newcastle.nsw.gov.au/about-us/news-and-updates/latest-news/media-statement-newcastle-basketball-stadium> <https://newcastleweekly.com.au/newcastle-basketball-stadium-battle-spills-off-court/>

This playground space is the result of a mid-1970s decision by certain Department of Education officers to shoehorn a large high school into a public (infants-primary) site. As demonstrated by maps approved by the Minister for Planning under the Northumberland Council District Planning Scheme (1945-1963) later ratified by the State Planning Authority, the current LHS site was originally reserved for a modestly-sized public school (the then-proposed 'East Lambton Public School' [not built]), not a large high school, for which the site was and remains clearly too small.



Figure 8. Detail of Sheet 3 of the Northumberland District Planning Scheme as approved by the Minister for Planning; Lambton High School was later constructed on the limited site clearly identified for a modestly-sized public school. It is obvious that Department of Education planners considered that it was only the presence of the park (Walarah Park) to provide playground, sporting and open space. Note also that the park is identified for conservation as public open space, rather than for infrastructure of any sort.

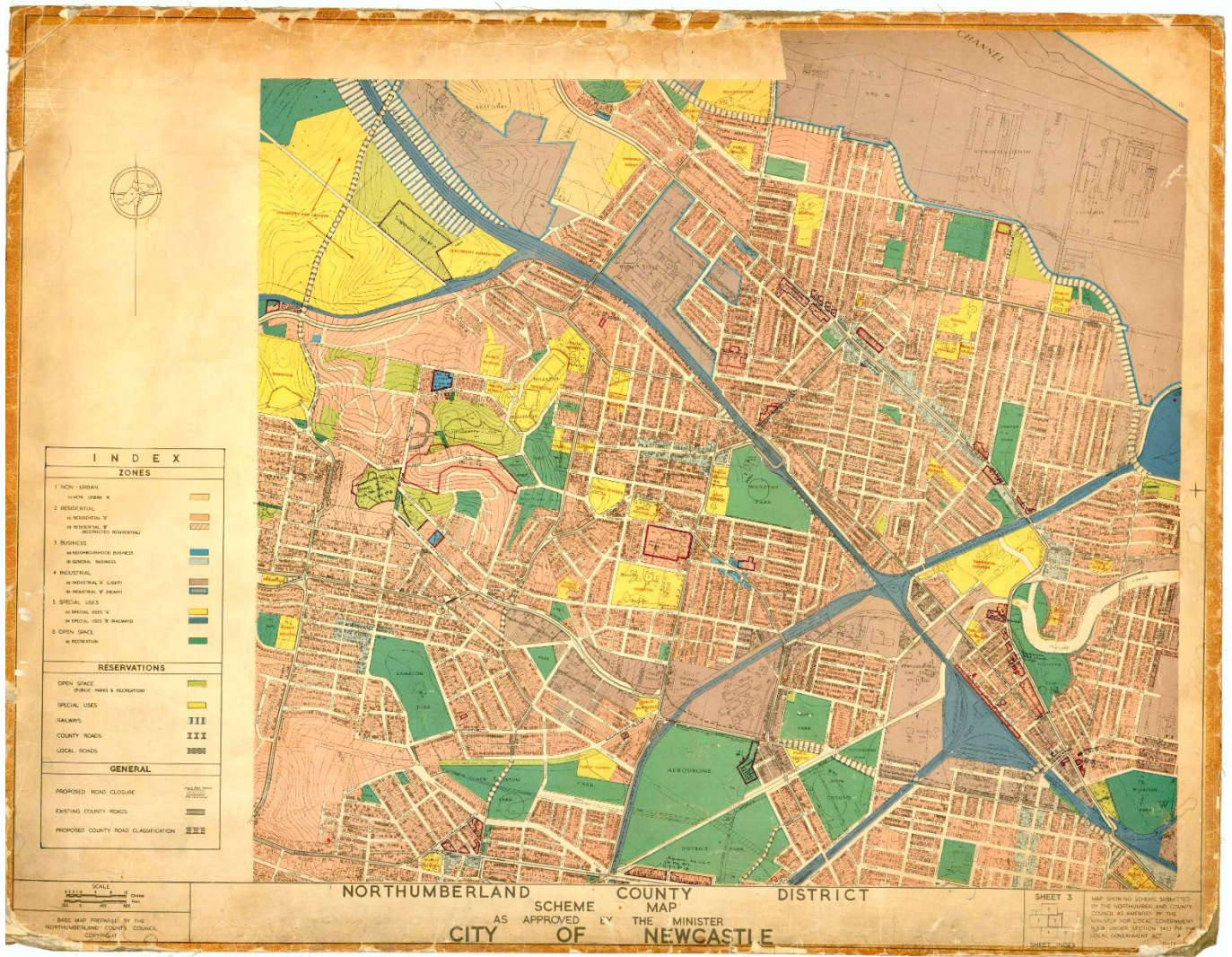


Figure 9. Northumberland County District Planning Scheme, Sheet 3, as approved by the Minister for Planning.



Figure 10. Wallarah Park (on which the huge stadium is proposed) in relation to Lambton High School immediately adjacent. Shown is a PDHPE class, with their teacher, during class time. At weekly sport, team training and daily lunch time, this area is alive with students, which the very cramped school playground is quite unable to accommodate. Development of the proposed huge basketball stadium will utterly compromise the school's current location next to a healthy and pleasant park, upon which it daily depends. This 1970s 'concrete school' needs Wallarah Park.

In the early 1970s, however, the Department came under pressure to close two outmoded single-sex inner-city Newcastle high schools (Hamilton Girls' and Newcastle Hill Boys'), the buildings of which were no longer fit for purpose. Departmental officers accordingly decided to build a replacement, co-educational high school in a middle-ring suburb. The intended 'East Lambton Public School' [not built] site, while much too restricted for a high school, was the only one remaining: <https://www.jstor.org/stable/20634579>

Accordingly, LHS was opened in 1974 on this clearly unsuitable site, which was and remains too small for a high school, as there is simply not enough playground. This obvious and severe shortage of space was partly ameliorated by the school using the adjoining Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2), reserved as 'park' by the Northumberland County Council District Planning Scheme (1945-1963) as subsequently administered by the State Planning Authority of NSW (1963-1974), the NSW Planning and Environment Commission, and the NSW Department of Environment and Planning and successor entities (1980-present).



Figure 11. It is proposed to subsume Wallarah Park, Lambton High School's sporting field and lunchtime playground, beneath this show court and associated huge stadium complex and car parking.

Conflict with state and local planning policy

The reservation of Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2) as 'park' has been maintained by *Hunter Region Growth and Change: Prelude to a Plan* (State Planning Authority of NSW, 1972) and *Hunter Regional Plan 2036* (NSW Department of Planning and Environment, 2016, Direction 20, p.47 and Map, p.55) <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2036.pdf>

The NSW Department of Planning and Environment's *Hunter Regional Plan 2041* (2022), too, identifies these ovals as open space important to the Broadmeadow Regionally Significant Growth Area of which they are part, together with the adjoining Hunter Park nationally significant precinct. (*Hunter Regional Plan 2041*, Map p.104, place strategy outcomes, including the necessity for reservation of public open space to support low- and high-rise residential development, p.106). <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

The Broadmeadow Regionally Significant Growth Area project is to 'deliver up to 20,000 new homes for 40,000 people and 15,000 jobs', substantially in 18- and 30-storey residential towers. The associated requirement for public recreation render it even more desirable that the adjacent Blackley Oval and Wallarah No.1 and No.2 Ovals remain available as

unalienated, unfenced public open space to which entry is available as of right.
<https://www.planning.nsw.gov.au/news/community-invited-have-their-say-future-broadmeadow>

The subject land is zoned RE1: Public Recreation in *Newcastle Local Environmental Plan 2012*, Part 2, Land Use Table. While recreation facilities (indoor), recreation facilities (major) and car parks are permitted with planning consent, it is submitted that the use of the subject land as a major basketball stadium and car parking conflicts with the weight of zonal objectives, which are as follows (italics mine):

'Zone RE1 Public Recreation

1 Objectives of zone

- To enable land to be used for *public open space* or *recreational* purposes.
- To provide a *range* of recreational settings and activities and *compatible* land uses.
- To *protect* and *enhance* the *natural* environment for *recreational* purposes.

2 Permitted *without* consent

Environmental facilities; Environmental protection works.

3 Permitted *with* consent

Aquaculture; Boat launching ramps; Boat sheds; Camping grounds; *Car parks*; Caravan parks; Centre-based child care facilities; Charter and tourism boating facilities; Community facilities; Emergency services facilities; Information and education facilities; Jetties; Kiosks; Marinas; Markets; Moorings; Passenger transport facilities; Recreation areas; *Recreation facilities (indoor); Recreation facilities (major)*; Recreation facilities (outdoor); Registered clubs; Respite day care centres; Restaurants or cafes; Roads; Water recreation structures.

4 Prohibited

Any development not specified in item 2 or 3.'

https://eplanningdlprod.blob.core.windows.net/pdfmaps/5900_COM_LZN_004B_010_20180321.pdf

LHS, which is what is commonly known as a 'concrete school' because of its very constricted and overcrowded environment, is taken up by buildings, including general learning blocks, school hall, covered outdoor learning area ('COLA'), car parking, circulation spaces and demountable classrooms. There is simply not enough playground space on the site for the current LHS enrolment cap of 1,040, which has already been exceeded by approximately 126 for a total of more than 1,166 students and 117 staff. The school has, since its foundation, attempted to cope with this by using, through Council agreement and fee payment to the Crown, the adjoining Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2): <https://www.nbnnews.com.au/2024/01/08/residents-fight-newcastle-basketball-stadiums-proposed-location/>

Walarah Park is daily used by LHS as playground each lunchtime, with teacher supervision, and as a sporting ground for daily Personal Development, Health and Physical Education (PDHPE) lessons, team training and weekly school sport. The school also uses it as an emergency evacuation space, given that the school lacks playground space away from its buildings: https://lambton-h.schools.nsw.gov.au/content/dam/doe/sws/schools/l/lambton-h/documents/emergency/EvacuationPolicy_Reviewed_August_2018_.pdf

Walarah Park (Blackley Oval and Wallarah No.1 and No.2 Ovals) are, then, essential to the operation of LHS, so much so that the school collectively calls them its 'South Oval' as an integral part of the school playground. Students gain access to the ovals via gates in its boundary fence. These are conveniently locked and unlocked by teachers on lunchtime playground, PDHPE, team training and sport duty. (Lambton High School Emergency Procedures - Whole School Evacuation - Revised August 2018):

https://lambton-h.schools.nsw.gov.au/content/dam/doe/sws/schools/l/lambton-h/documents/emergency/EvacuationPolicy_Reviewed_August_2018_.pdf

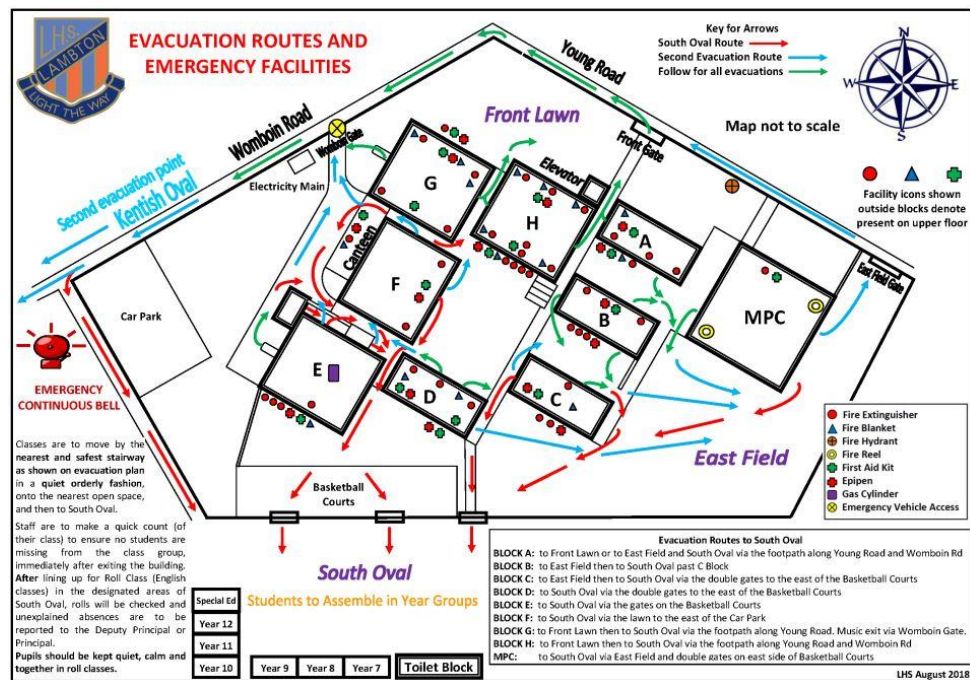


Figure 12. Map of Lambton High School evacuation routes and emergency facilities; Wallarah Park (Blackley Oval and Wallarah No.1 and No. 2 Ovals) are described as 'South Oval', on which the entire school of more than 1,166 students and 117 (2022 figures) staff, a total of 1,283 persons, assemble during emergencies. Should the proposed huge basketball stadium proceed, there will be no 'South Oval' to which to evacuate, as it will be utterly subsumed under multi-storey structures.

Effect on traffic and parking

LHS possesses a car park far too small to accommodate staff, and certainly not students or parents who drive to school in the day or evening classes, drop-off and pick-up, parent-teacher events, subject selections, orientation evenings, assemblies, performances and year-group activities; these park in the surrounding streets, in which very limited parking is available due to the surrounding population and sporting and other activities in the New Lambton-Broadmeadow-Hunter Park (planned Hunter Sports and Entertainment Precinct) area. Parking is further limited by the long-standing regular and casual use of LHS hall, currently including for Saturday and Sunday public worship, weekday and weekend children's activities and outreach by a church with hundreds of members and adherents. The insufficient parking being planned for the proposed huge basketball stadium will place street parking under yet further pressure. Public transport (by bus) is so scarce as to be negligible, particularly given the reduction in bus routes with the counterproductive privatisation of Newcastle buses by the previous government. Moreover, the site is remote from Broadmeadow railway station, approximately 1.7km, a 25-minute walk for a fit person not living with disability.

The existing car park of the 33,000-person capacity McDonald Jones Stadium car park at Hunter Park, east of the already very busy Turton Road, is already filled to capacity during Newcastle Knights, Newcastle Jets and supercross fixtures, together with an increasing number of sporting and general events and displays. These include a growing list of large-scale concerts by international touring artists, most recently Elton John, Paul McCartney and Pink. The modestly-sized International Hockey Centre car park at Hunter Park is fenced and locked for the exclusive use of that facility. Some idea of existing traffic problems in the area is provided by the following Facebook exchanges:

https://m.facebook.com/SoniaHornery/posts/808335440731559/?_se_imp=0DcBwtCLEPCzI9zDi

Extraordinarily negative effect on Lambton High School: two

The most recent LHS report cites an enrolment of 1,166 students, including 71 Aboriginal students, 64 EAL/D students and 35 students in five Special Education classes; there are also 117 staff. (Lambton High School Annual Report 2022, p.5): https://reports.sparo.schools.nsw.gov.au/annual-report/2022/8482/2022_Lambton_High_School_Annual_Report.pdf

It seems certain, given increasing LHS feeder school enrolments, that these numbers will have to further increase. LHS is fed by public schools already very much above their enrolment capacity. ABC and local print media in 2021 described this situation as ‘bursting at the seams’. This is against a background of a projected increase of 33,300 people and 16,800 dwellings in the Newcastle Local Government Area by 2036 (Hunter Regional Plan 2036, p.68). To these projections must be added the 40,000 additional residents and 20,000 additional high-rise residential tower units proposed for the immediately proximal Broadmeadow Regionally Significant Growth Area.

LHS will be one of several inner Newcastle high schools to have to significantly increase its student numbers in accommodating these students within its zoning. The only way in which to do this will be to install a significant number of demountable classrooms. Several of these have already been installed, further reducing the school’s already very small playground space. This increase in enrolments, then, will make the school’s ability to use the existing Wallarah Park (Blackley and Wallarah No. 1 and No.2 Ovals) even more valuable. The proposed basketball stadium, of admitted ‘magnitude’, will prevent this use, as the ovals will have utterly disappeared under its physically dominant buildings. Council has suggested that LHS instead avail itself of ovals well to the east, west of Wallarah Road; yet these unsecured facilities have been assessed as too far from the school to use as a daily lunchtime playground or for PDHPE lessons, team training and school sport, not to mention the necessity to cross a road with poor sight lines in all weathers and conflicts with existing formal and casual users of the facilities as of right.



Figure 13. Aerial view of the locality. Lambton High School’s very restricted site and absence of playground and physical training space is obvious, as is its dependence on adjacent Wallarah Park (Blackley Oval and Wallarah No.1 and No.2 ovals) for daily PDHPE activities, daily team training and daily lunchtime play, together with weekly sport. The park, in a clearly residential area, will be entirely lost if the proposed huge basketball stadium proceeds. Far better for the stadium to be rebuilt on or adjacent to its existing site (at bottom left hand corner) near Broadmeadow railway station or at Hunter Park (Hunter Sports and Entertainment Precinct) around McDonald Jones Stadium (centre of image).

The majority of the LHS parent community is strongly opposed to the proposed stadium complex: <https://www.newcastleherald.com.au/story/8458888/parents-fight-plan-for-basketball-stadium-next-to-lambton-high/> A LHS Parents’ and Citizens’ Association (P&C) survey conducted in late 2023 shows that more than 75% of LHS parents favour retaining the park for use by the school: <https://newcastleweekly.com.au/hornery-yes-to-new-basketball-stadium-but-no-to-proposed-site/> NBN (Channel 9) television news quotes a survey figure of 83% of parents being opposed to the stadium proposal: <https://www.nbnnews.com.au/2024/01/08/residents-fight-newcastle-basketball-stadiums-proposed-location/>

LHS has for decades celebrated ‘Green Day’, celebrating the environment and encouraging students and staff to support environmental concerns and promote environmental sustainability. This includes performances by staff

and students, together with a 'best dressed' competition for sustainable costume.

https://en.wikipedia.org/wiki/Lambton_High_School

It would be difficult to hold such a celebration in the shadow of the proposed stadium, which its promoters admit is one of 'magnitude'. The construction immediately adjacent to LHS of a huge basketball stadium, physically and figuratively dominating the school immediately adjacent and denying it the open space on which it has for half a century relied, is the last thing LHS needs in this time of state-wide challenges to public education. Additionally, how can LHS possibly address the needs of an emergent population of at least 40,000 additional proximal residents if its playground, sports field and evacuation space is taken away by the basketball stadium proposal?

A flood-labile site

In addition, the site of the proposed huge basketball stadium is subject to flooding. Council's Interactive Flood Map characterises this as 'shallow and slow moving flood water in a 1% Annual Exceedence [sic] Probability event, that has a 1% chance of occurring each year'. It is located next to a substantial, open Hunter Water Board stormwater drain characterised by 'deep and fast moving floodwater in a 1% Annual Exceedence Probability event, that has a 1% chance of occurring each year': <https://newcastle.nsw.gov.au/living/environment/flooding>



Figure 14. Ms Jacqui Young, Secretary of Lambton High School Parents' and Citizens' Association, December 2023: 'Lambton High School parents are gearing up to fight Newcastle's new basketball stadium being built on ovals where their children play sport and study PE [and play each lunchtime]'; Newcastle Herald, 14 December 2023. The school's lack of playground space is obvious.

Obvious alternatives are available

Other, more suitable, options are available for a new or refurbished basketball stadium. These are: (a) refurbishment and extension of the existing Broadmeadow stadium at the intersection of Curley Road and Young Road, Broadmeadow. (b) The construction of a new stadium on vacant Crown land (former Railway Institute tennis courts) on Moira Road, Broadmeadow, immediately adjacent to the existing site; the existing stadium and car parking could remain in use until the completion of the new stadium. (c) The construction of a new stadium within Hunter Park (planned Hunter Sports and Entertainment Precinct-Broadmeadow Regionally Significant Growth Area east of Turton Road. (d) The former Broadmeadow Locomotive Depot precinct. (e) Other sites in the Lower Hunter. Options (a) – (d) have the advantage of being classified as 'very low' flood risk, ie, 'the fully extent of the flood prone area, outside of the 1% Annual Exceedence [sic] Probability event, where larger less frequent floods up to the Probable Maximum Flood can occur.' Alternately, the stadium could be constructed elsewhere, whether in Newcastle or the other Lower

Hunter LGAs. This is particularly so given that the Hunter Park masterplan allows several years before the of the current, Broadmeadow, basketball stadium, must be relocated. There is, therefore, no urgency at all in seeking to alienate Wallarah Park (Blackley Oval and Wallarah No.1 and No.2 Ovals) for a hastily-announced and most substantially underfunded proposal, rather than selecting and assessing a more appropriate site in the Lower Hunter.



Figure 15. Hunter Park (formerly District Park), the planned Hunter Sports and Entertainment Precinct. The huge proposed basketball stadium would far better be located within this masterplanned site than on Wallarah Park, public open space in a residential area and immediately adjoining Lambton High School, one many stakeholders to which that park is essential.

Conclusion

There is no doubt that the Lower Hunter Region requires a refurbished, or new, basketball stadium; but not one that alienates strategic, heavily-used public open space (Walarah Park and its ovals) required by residents, active and passive recreational users, and an immediately adjacent, public high school with nearly 1,200 enrolments and more to come. Such a stadium could be provided elsewhere, whether in the Lake Macquarie, Port Stephens, Maitland or Newcastle LGAs. It could potentially be provided on its existing Broadmeadow site; at Hunter Park, the planned Hunter Sports and Entertainment Precinct east of Turton Road; or within the Broadmeadow Regionally Significant Growth area, including the Broadmeadow Locomotive Depot site.

Since its foundation in 1974, Lambton High School has struggled with its severely restricted site, mandating its use of Wallarah Park (Blackley Oval and Wallarah No.1 and No.2 Ovals) as its playground, sports field and evacuation area; increasing enrolments from feeder schools are increasing site restrictions by adding to the number of demountable classrooms already in use on site.

Walarah Park (Blackley Oval and Wallarah Ovals (No.1 and No.2) should be preserved and improved in its current role as unfenced, unrestricted and unencumbered public open space for the local and district community, and an essential playground, sporting, training and emergency resource for a growing Lambton High School immediately adjoining it.

The reservation of Wallarah Park (Blackley Oval and Wallarah Ovals No.1 and No.2) as 'park' has been maintained by *Hunter Region Growth and Change: Prelude to a Plan* (State Planning Authority of NSW, 1972) and *Hunter Regional Plan 2036* (NSW Department of Planning and Environment, 2016, Direction 20, p.47 and Map, p.55) <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2036.pdf>

The NSW Department of Planning and Environment's *Hunter Regional Plan 2041* (2022), too, identifies these ovals as open space important to the Broadmeadow Regionally Significant Growth Area of which they are part, together with

the adjoining Hunter Park nationally significant precinct. (*Hunter Regional Plan 2041*, Map p.104, place strategy outcomes, including the necessity for reservation of public open space to support low- and high-rise residential development, p.106). <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hunter-regional-plan-2041.pdf>

The subject land is zoned RE1: Public Recreation in *Newcastle Local Environmental Plan 2012*, Part 2, Land Use Table. While recreation facilities (indoor), recreation facilities (major) and car parks are permitted with planning consent, it is submitted that the use of the subject land as a major basketball stadium and car parking conflicts with the weight of zonal objectives.

The proposal to develop on essential and long-standing public open space (Wollarah Park, including Blackley Oval and Wollarah No.1 and No.2 Ovals) the Hunter Indoor Sports Centre, which despite a recent change of nomenclature remains the creature of the Newcastle Basketball Association, a private entity, is unsound. The alienation of a Crown reserve, long available to allcomers as of right, for a huge, very substantially underfunded, basketball stadium that will physically and figuratively dominate the public high school and residences immediately adjacent, will alienate public open space essential to the wellbeing of the Newcastle population. This is to be subject to a projected increase of 33,300 people and 16,800 dwellings in the Newcastle Local Government Area by 2036 (*Hunter Regional Plan 2036*, p.68), plus a further 40,000 residents and 20,000 high-rise residential tower units in the Broadmeadow Regionally Significant Growth Area immediately proximal to Wollarah Park and its ovals.

It is, then, respectfully submitted that, for the reasons here adverted to, the State Significant Development proposal for the proposed Hunter Indoor Sports Centre (SSD-65595459), originally and more accurately described as the proposed Newcastle Indoor Basketball Stadium, should be rejected by Planning NSW.

Yours faithfully,

[Name and address withheld]