Department of Planning & Environment Industry Assessments GPO Box 39 SYDNEY NSW 2001

Attention: Navdeep Shergill - Navdeep.singhshergill@planning.nsw.gov.au

RE: Review of Environmental Impact Statement (SSD-65596459) – Hunter Indoor Sports Centre, Lot 2380 DP755247, Lot 2379 DP755247, Lot 2378 DP755247 and Lot 2377 DP755247, 2 Monash Road and 24 Wallarah Road New Lambton

I am writing to formally object to the proposed development of the Hunter Indoor Sports Centre (HISC) as outlined in the Environmental Impact Statement (EIS) and its associated appendices. After a detailed review of the project's key aspects, I have identified several critical concerns that I believe undermine the project's feasibility and its long-term sustainability. A summary of the concerns is below with more detailed information and references to relevant section of the EIS provided in Attachment A.

1. Staging and Financial Sustainability

The financial viability and staging of the HISC are of serious concern. The total estimated cost of the project is approximately \$90 million, yet only \$30 million has been allocated for the first stage (Stage 1A). The remaining funding for subsequent stages is uncertain and will rely on future government grants, which exposes the project to significant financial risk. Given the lack of a clear funding pathway and the shortfall of approximately \$60 million, there is a high likelihood that the project may be delayed, abandoned, or left incomplete. This would result in a facility that is underutilised, and the loss of valuable green space and sports fields would have irreversible consequences for the local community.

2. Traffic Impact

The Traffic Impact Assessment (TIA) raises several issues that have not been adequately addressed:

- Increased traffic through residential areas: Local roads like Young Road, Wallarah Road, and others will experience higher traffic volumes, posing risks to vulnerable road users, especially children.
- Cyclist safety: The proposed access points fail to accommodate cyclists properly, which may lead to dangerous situations, including side-swiping accidents.
- Pedestrian safety: Narrow footpaths on Turton Road and the lack of proper pedestrian facilities could result in dangerous conditions for children and elderly people.
- Event-related traffic management: There is no clear strategy for managing large events, which could lead to congestion and exacerbate traffic issues. Further consultation with surrounding venues is required.

3. Event Management

There is a lack of detailed consultation with other nearby venues and stakeholders, which raises concerns about potential conflicts during major events. These venues include the Newcastle International Hockey Centre, Lambton Jaffas Football Club, and other local sporting clubs. Proper consultation and coordination are essential to prevent disruptions and ensure the facility does not strain local infrastructure and services.

4. Flooding and Stormwater Drainage

The proposed site is located in a flood-prone area, and the EIS acknowledges that the development will exacerbate flood risks. According to the flood risk impact assessment:

- The site's carpark area will be flooded to depths of 1–2 meters during a 1% AEP event, which is unsafe for vehicles and people, especially children.
- The model indicates increased flood depths in surrounding areas, including properties near Lambton High School. There is also concern about the potential for debris and rubbish to block floodways, causing more extensive flooding downstream.
- I strongly urge reconsideration of the site selection due to these significant flood risks and suggest exploring alternative locations that are less prone to flooding.

5. Green Space/ Open Public Space

The proposed development would involve the permanent loss of valuable open space currently used for community sports. The development contradicts the objectives of the Public Open Space Strategy for NSW, which emphasises the importance of preserving and expanding green spaces for community use. The facility's design focuses heavily on basketball, with a large retail and corporate component, while local multipurpose fields in their current form like Wallarah and Blackley serve broader community needs.

Conclusion

The Hunter Indoor Sports Centre, as proposed, presents substantial risks to the financial sustainability, safety, environment, and community interests. Given the issues raised — particularly regarding funding, traffic impacts, flooding, and the loss of public green space—I urge the planning authorities to reconsider the development or, at the very least, explore alternative site options that better align with the community's needs and environmental protections.

Thank you for considering my concerns. I look forward to your response.

Yours faithfully,

Concerned resident.

Attachment A

Item	Comment
Staging and Financial Sustainability	The proposed development of the Hunter Indoor Sports Centre (HISC), as outlined in the Environmental Impact Statement (EIS) and its associated appendices, raises several significant concerns, particularly regarding the proposed staging and the current funding arrangements. A detailed review of the EIS, including Appendix G – Estimated Development Costs (EDC), has revealed substantial uncertainties surrounding both the funding availability and the timeline for completion.
	The total estimated cost of the development is approximately \$90 million (including EDC and GST). However, only \$30 million of this amount is currently allocated, which does not appear adequate to complete Stage 1A (between \$31M and \$41M, refer below). The remaining funding for subsequent stages has not been secured and will rely on future government funding or grants. This creates a considerable risk that the full scope or even the first stage of the project may not be completed as envisioned, leaving the community with an unfinished and potentially underutilised facility. Notably, the EIS does not offer sufficient evidence that adequate funding has been secured to fully progress the development, which raises concerns regarding the feasibility of the project, the potential for delays, and the negative impact on the surrounding community.
	A critical issue is the lack of a clear and guaranteed pathway for securing the necessary funding for later stages, such as Stage 1B and Stage 2 . Given the current funding shortfall of approximately \$60 million, it is highly unlikely that the construction will proceed according to the initially proposed timeline, with completion anticipated by mid-2026. Without a clear and comprehensive funding plan in place, there is a real possibility that the project could be abandoned partway through, resulting in a facility that is incomplete, impractical, and unable to serve its intended purpose. Furthermore, the environmental and social impacts of such an outcome – particularly the loss of valuable green space and sports fields – would be irreversible.
	The Estimated Development Cost (EDC) , as detailed in Appendix G, is based on a construction schedule that assumes the project will begin in late 2024 and be completed by mid-2026. However, this timeline does not account for potential delays, escalation of costs, or the non-sequential nature of the proposed staging. If the project is delayed or the stages are retendered, additional costs will be incurred, further increasing the total expenditure required. The lack of contingency planning for these uncertainties makes it even more difficult to assess the viability of the project, particularly given that the EDC only reflects a portion of the work that will be required across multiple stages.
	I have serious concerns about the allocation of public funds to this ambitious project, especially when other essential services such as transport infrastructure, education, and healthcare are also in need of financial support. The inclusion of corporate offices, a high-performance training facility, retail spaces, and large-scale amenities (including a 2,500-seat show court) seems excessive and unwarranted, particularly given the redevelopment of Broadmeadow through the Broadmeadow Place Strategy

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	and the Hunter Park sub precinct which is labelled as a thriving entertainment, sporting, commercial and residential destination of national significance, which is proposed to include a new multipurpose indoor arena, new regional aquatic and leisure centre, road and intersection upgrades, flood mitigation works and a pedestrian boulevard connecting to Broadmeadow Station. A more modest proposal, such as the construction of up to eight courts, may have been more achievable within the Broadmeadow				
	precinct within the current funding constraints.				
	Breakdown of Staging and Costs				
	The proposed stages of the project, as outlined in the EIS and appendices, include				
	 Stage 1A: (page 5 of Appendix TT) – note also that Stage 1A still requires the use of the existing basketball stadium facility to accommodate demand (page 7 of Appendix TT) Single-storey building 				
	 6 community courts 				
	Supporting amenities and other facilities				
	110 Car Parking spaces including drop-offs				
	Participants change rooms and public amenities				
	 To consolidate lots 2377 to 2380 as part of the development proposal. 				
	Sewer diversion				
	Demolition of existing Amenities building				
	Removal of nominated existing trees				
	Estimate of Stage 1A – Estimate = \$30.8M to \$41.2M based on rates used in Appendix G – assumes rates from EDC summary table				
	Demo and site prep = \$1.2M				
	Buildings Works, GFA = 5,975m2 using rate of \$2,455.21 per m2 = \$14.6M (note that EIS main body Section 3.1.1 states Stage 1A				
	has a GFA of 10,218m2, which would be \$25M) External Works, Services and Infrastructure = \$7.1M				
	Preliminaries (1/3 only) = \$3.3M				
	Builders margin (1/3 only) = \$1M				
	Furniture, fixtures and equipment (1/3 only) = \$0.5M				

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	Professional, consulting and design fees (1/3 only) = \$1.4M			
	Contingency (1/3 only) = \$1.7M			
	 Stage 1B: (page 8 of Appendix TT) – note also that Stage 1B still requires the use of the existing basketball stadium facility to accommodate demand (page 10 of Appendix TT) Extend the HISC Facility to the West to provide two (2) additional basketball courts Addition of a mezzanine level for function rooms, administration spaces, and training areas. Expanding the car park to include an additional 75 spaces, bringing the total to 185 spaces. Remove additional trees to accommodate the building expansion. 			
	Estimate of Stage 1B – Estimate = \$12M to \$20.5M based on rates used in Appendix G – assumes rates from EDC summary			
	table			
	Demo and site prep = \$0M (completed in Stage 1A)			
	Buildings Works, GFA = 5,134m2 using rate of \$2,455.21 per m2 = \$12.6M (note that EIS main body Section 3.1.1 states Stage 1B has a GFA of 1,630m2, which would be \$4M)			
	External Works, Services and Infrastructure = \$0M (completed in Stage 1A)			
	Preliminaries (1/3 only) = \$3.3M			
	Builders margin (1/3 only) = \$1M			
	Furniture, fixtures and equipment (1/3 only) = \$0.5M			
	Professional, consulting and design fees (1/3 only) = \$1.4M Contingency (1/3 only) = \$1.7M			
	Contingency (1/3 onty) – \$1.7M			
	Stage 2: (page 11 of Appendix TT) – note also that only after completion of Stage 2 is the existing basketball stadium at Broadmeadow is redundant.			
	 Extending the northern and southern sides of the building to add three more courts, which can be used as a show court with retractable grandstand seating. 			
	 Extending the southern side to include a high-performance training area and one additional court. 			
	 Extending the southern side to include a high-performance training area and one additional court. Expanding the mezzanine level for more corporate spaces. 			
	 Expanding the mezzanine level for more corporate spaces. Expanding the car park to include an additional 55 spaces, bringing the total to 240 spaces. 			
	Extension of the existing building with a total additional GFA of approximately 7,180m2			

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	Mezzanine Level – an extension of the mezzanine to provide additional corporate spaces				
	An additional 6 courts for basketball and other sports				
	A show court with 2,400 seats				
	a cafe and social zone				
	 tenant areas for associated health and wellbeing services 				
	Athlete development and training facilities				
	Estimate of Stage 2 (including previous stages) – \$90,875,861 from Appendix G				
Traffic	The proposed development of the Hunter Indoor Sports Centre (HISC), as outlined in the Environmental Impact Statement (EIS) and its associated appendices, raises several significant concerns, particularly regarding the proposed traffic assessment and impacts. A detailed review of the EIS, including Appendix P – Traffic Impact Assessment (TIA), Appendix R – Construction Traffic Management Plan (CTMP) and Appendix RR – SIDRA intersection modelling (Sidra) have identified traffic impacts that do not appear to have taken into account all aspects of traffic outlined below and this is a concern.				
	 Trip distribution according to Google Maps is different to how trips appear to distributed in the model according to section 4.1.3 and 4.1.6 of the TIA, particular the use of local roads in Lambton such as Young Road, Wallarah Road, Howe Street, Hobart Road, Womboin Road and Monash Road, some of which are narrow roads through a residential area and will increase the risk of vehicle collisions with vulnerable road users such as children on bicycles and scooters (particular in the afternoon peak when the HISC stadium is in high use combined with children returning from nearby schools. Refer google map (screenshots below) suggested routes to Wallarah Oval from selected suburbs, particularly those in western suburbs of Newcastle and from Hunter Expressway 				











Item	Comment
	risk to pedestrians (particularly young children and the elderly) who may lose balance on unstable ground with potential for slips, trips and falls, nearby the large concrete drain (Lambton Ker-rai Creek)
	4. There is a permanent loss of parking on Turton Rd due to the access provided.
	5. There is a risk that vehicles queue across the adjacent mid-block pedestrian crossing when waiting to enter the site, (e.g. vehicles stopping to park, waiting for parks to become available or vehicles requiring to give way to pedestrians using the footpath that crosses the entry point). This presents a safety risk to vulnerable road users (cyclists and pedestrians) who are using the mid-block crossing and may lead to serious injuries or possible death.
	6. There are multiple opportunities for vehicles to access the site either illegally or in a dangerous manner due to how access has been provided from Turton Road. Refer sketches below
	a. performing a u turn on Turton Road at the intersection with Monash Road.
	b. performing a right turn from Turton Road at the intersection with the McDonald Jones stadium access
	c. performing a straight or right turn movement out of the development onto the southbound carriageway of Turton Road





Item	Comment			
	8. Will the right turn bay from Turton Road into Young Road and Turton Road into Monash Road from the north be extended to cater for additional traffic using this route to access the development from the north?			
Event Management	The proposed development of the Hunter Indoor Sports Centre (HISC), as outlined in the Environmental Impact Statement (EIS) and its associated appendices, raises several significant concerns, particularly regarding the proposed event management.			
	Stated in the EIS: "The plan has been developed following consultation with Venues NSW to determine opportunities for the use of the McDonald Jones stadium carpark for the HISC. Venues NSW supported this approach, subject to events at the two facilities not occurring at the same time."			
	There is however no mention of how often consultation will occur.			
	 There is no mention of consultation with other large events that may occur at any of the following nearby venues Newcastle International Hockey Centre, Broadmeadow 			
	Lambton Jaffas Football Club, NPL Games at Arthur Edden Oval			
	Western Suburb Leagues Club, Newcastle Rugby League at Harker Oval			
	 Local community sport, Soccer, Cricket, Rugby League, Hockey and Netball are all present within this area, including matches on weekends and training during the week. 			
Flooding and Stormwater Drainage	The proposed development of the Hunter Indoor Sports Centre (HISC), as outlined in the Environmental Impact Statement (EIS) and its associated appendices, raises several significant concerns, particularly regarding the identified flooding impacts. A detailed review of the EIS, including Appendix CC – Flood Risk Impact Assessment has revealed significant concerns with the proposed development.			
	The executive summary of the flood report states			
	"The DCP Management of Risk to Property condition C-7 requirement cannot be satisfied by the proposed development without impacting the retention of floodways and flood storage or having implications for off-site flood impacts, as this would require significant raising of the external surface levels throughout the proposed car park. Given this conflict between satisfying different			

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	aspects of the flood planning controls non-conformance with condition C-7 is considered the better option for overall flood risk management."	
	My suggestion would be that the best mitigation here is to not build the proposed development on this site and instead investigate a suitable alternative that is not in flood-prone location. There is a risk that vehicles and other items that are usually stored in carparks, such as rubbish bins, containers and other floatable objects could be moved by flood water into floodways' and become blockages, causing significant flooding that has not been accounted for in the modelling.	
The flood hazard classification maps show that for a 1% AEP event the carpark area is shown as H3 which is vehicles, children and the elderly. The area is also shown to be about 1m and in some places up to 2m in flood significant concern given the carpark will be used by vehicles and the facility will likely be used by children, be a risky situation to put people and vehicles in that kind of danger. It gets a lot worse in the PMF event, wit carpark increasing to a H5 and flood depth >2m, this is a significant concern for flooding risk. This is also an cyclist shared pathway exists adjacent to Lambton Ker-rai creek.		
	10%AEP Flood hazard existing	







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	Index well impact (m) - 4.09		
	flooding (increase afflux or duration), with a mechanism for landholders to get an independent assessment through something like an independent flood advisory panel to make determinations if agreements cannot be reached.		
Green space/Open public space	This development is not in accordance with the Public Open Space Strategy NSW document that was released by the NSW government in 2022, link to website here.		
	https://www.planning.nsw.gov.au/policy-and-legislation/open-space		
	The Minister for Planning at that time (Anthony Roberts MP) had the below foreword. I have highlighted some of the key points he touches on.		

Item

Minister's foreword

Public open space is everyone's backyard, for everyday activities and extraordinary events. It's where our communities come together to enjoy moments that matter - celebrating a first birthday, seeing friends and family, cheering on a game, connecting with nature, and so much more.

The NSW Government is already delivering more and better public open space by collaborating with state agencies and local councils, through programs like Parks for People, the Public Space Legacy Program, and Everyone Can Play.

But together, we can do so much more.

The Public Open Space Strategy for NSW provides a framework for implementing policies across Government and contributes to a more joined-up approach to public open space planning and delivery.

This ambitious strategy shows how we can coordinate, plan and continue to deliver public open space across our state. It provides essential guidance for effective, efficient and equitable provision, so we can make sure existing and future neighbourhoods are great places to live.

By setting this direction for public open space, we are taking steps to create meaningful legacies for all communities.

Anthony Roberts MP Minister for Planning and Minister for Homes



Recreation hub: golfers chip in with own plan for Moore Park

Megan Gorrey Sydney editor

Moore Park's 18-hole golf course while golfers say the 18-hole course would be salvaged and parts of the is required for competitions, and fairway reworked as a "world- the sport provides mental and class" sport and recreation pre- physical health benefits for players. cinct under an alternative proposal golfers hope will fend off plans to claim the course's western boundsplit it into a new public park for any and part of the land north of Sydney's east.

rising urban density with access to golf course and the operation of the green space, Premier Chris Minns existing driving range and clublast year vowed to slash nine holes from Moore Park Golf Course and convert nearly half the 45-hectare site into parkland for residents of

Green Square, Redfern, Zetland and Waterloo in mid.2026. The move angered golfing en-

thusiasts, prompting an alliance of industry bodies - Golf Australia, PGA of Australia Golf NSW and Moore Park Golf Club - to fight back with a new plan. The Moore Park Golf Collect-

ive's proposal, unveiled on Saturday, would transform about 15 hectares of underutilised land at the eastern suburbs course with a football oval, a BMX track, a dog

pedestrian and cycling path. grant the public access to green

space while retaining a full course. "Golf NSW believes the proposing Sydney by offering a multitude generation.

of recreational activities, whilst continuing to service the massive demand for publicly accessible golf Via an 18-hole course," he said. Planning and Public Spaces Minister Paul Scully hadn't seen amis to create a park that caters to the details of the alternative proposal, but said the government "renains committed to having more

public, green space".

Clover Moore and former premie Bob Carr have said it would give more people access to open space,

The government intends to re-Dacey Avenue for recreational Amid debate about balancing space while retaining a nine-hole

h Under the golfing sector's plan,



NSW has plans to slash nine holes from the course. Photo: Nick Moin

carpark and a three-kilometre 18-hole course that could host local, state and national competitions, Golf NSW chief executive Stuart a shortened driving range with ex-Fraser said the proposal would tra bays, and a mini-golf course. It also includes an adventure playground, a nature play space, a futsal court, an athletics hub, baral provides a win-win solution for becues, a fitness trail and areas for the NSW government and a grow- eastern suburbs' banksia scrub re-

"By enhancing existing infrastruc-

financially sustainable way." Moore Park Golf Course is one of 16 government-owned public The prospect of shrinking the golf courses in metropolitan Moore Park course has been de- Sydney. It is run by a private operbated for years. Proponents includ- ator under a service agreement

park, a multi-storey 500-space the site would have a smaller

Save Moore Park Golf Club spokesman Jared Kendler said:

diverse recreational interests in a

ing City of Sydney Lord Mayor with the NSW government.

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	Additionally, there was a similar article in the Herald Sun on 10/11/2024 (refer above) in relation to a proposal to repurpose part of a golf course at Moore Park for more public open space in Sydney's eastern Suburbs and the now Minister for Planning, Paul Scully commented on that proposal saying that the government "remains committed to having more public, green space".
	Page 9 of the Public Open Space Strategy for NSW, is shown below with relevant sections highlighted. The SSD proposal is titled as "Hunter Indoor Sports Centre" but don't be fooled as this is not a multipurpose facility. The applicant for this development is Newcastle Basketball, with a funding commitment provided to Newcastle Basketball to build a basketball facility that will be owned and operated by Newcastle Basketball, it is just a basketball stadium.
	The ovals at Wallarah and Blackley are currently multipurpose ovals that are used by the local community, sporting groups and the high school and they are in line with what the people of NSW have asked for according to Page 10 of the Public Open Space Strategy for NSW.
	Extract from page 10 of Public Open Space Strategy for NSW.
	When we asked people what open space experiences they would like to see, ² they requested more opportunities for swimming, more large open spaces, better connected networks of open space, more high quality and multipurpose open spaces, and certainty that public open spaces will be protected into the future. To deliver on these identified community needs and preferences, a coordinated approach to planning for public open space is needed across government.

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	Page 9 of Public Open Space Our vision	Strategy for NSW.	
	Government through leadershi	nces across NSW, enabled by the NSW (p, coordinated direction and support. Ing towards. It is supported by five broad objectives.	
	Sanding of the set five objectives will be act	 space more effectively, through joint-use arrangements, co-management structures, memorandums of understanding, committees of management, and licensing agreements. Ensure the value of public open space in projects delivered across Government, including the economic, social and environmental benefits. Ensure a well-connected system of public open space that supports healthy habitats for plant and animal communities, and mitigates the impacts of a changing climate and urban heat for people. Provide public open space in areas where it is most needed. Ensure public open spaces are planned, designed and managed sustainably and are resilient. Ensure public open spaces are high quality and well maintained. Create opportunities for local business and skills formation, by recognising public open space as a skills 	
	Collaborate and partner across Government to deliver public open space.	economic development infrastructure across NSW. Provide support and guidance for local Government in the planning, design and management of public open space. Provide a range of funding programs that are focused on the improvement and expansion	

Item	Comment