

Lambton High School Parents and Citizens Association

Submission opposing proposed

Hunter Indoor Sports Centre (HISC) - SSD-65595459

November 2024

Introduction

This submission is made by the Lambton High school Parents and Citizen's Association (P&C) on behalf of the Lambton High School community, which comprises of the past, current and future students of Lambton High School, their parents and carers, siblings and neighbours. It also includes the school staff who teach and support the students, and enable the effective running and administration of the School now and into the future.

This submission comprises of:

- A summary of key issues of concerns
- Details about the school community, the school and existing uses of Wallarah and Blakely oval that are missing and/or misrepresented in the EIS and appendix
- A table of key issues and our concerns with the way these issues have been described and the limitations of the suggested mitigation measures.

The Lambton High School Parents and Citizens Association is an independent Incorporated organisation comprising of parents and other community members, that aims to support the Lambton High School community, staff and students. The P&C works closely with the principal and staff, and provides financial support to enhance the school and promote wellbeing, education and the interests of the school. The P&C runs the school canteen and all profits from the canteen are used to support the school and students.

Summary of concerns

- The Lambton High School current and future community of students, staff, parents and carers are major stakeholders and users of Wallarah and Blakely Oval. The EIS has not accurately or adequately identified the geographic, demographic or social nature of this stakeholder group now or into the future.
- The statement in the EIS that the ovals are underutilized is based on erroneous and misleading sources that did not in any way account for the School's right to use the land. The EIS fails to accurately or adequately identify the current uses and users of these ovals and completely ignores the nature of long formal agreement in place that gives Lambton High use rights to these ovals.
- The EIS is riddled with errors, omissions and false statements and cannot be considered a correct or adequate assessment of the impacts of the proposal. The EIS demonstrates a very poor understanding of the location, its uses, and its relationship to the proximal and wider school community.

- The development process has not adequately identified or address the needs of the current and future School community, nor has it adequately identified the specific impacts of the proposal on the School community which will be significant and last for generations.
- There is no certainty that the greenspace and sports field shown in images of stage one and stage 2 in the EIS would be built, managed or maintained as they are not listed as part of the formal proposal description of facilities and are not mentioned in the Operations Plan. There is no certainty that the school or school community would be able to use these outdoor facilities even if they did eventuate.
- The school does not need access to more indoor sports facilities or to basketball courts, these are well catered for in the existing school infrastructure. The school DOES need access to ovals and greenspace suitable for free play and to reduce school crowding.
- Most of the mitigation measure that are proposed that relate to the impacts on the School community have not been confirmed or formalised, and there is no enforceable mechanism for ensuring their delivery, this includes the use of the Macdonald Jones Stadium car park for events and the use of the external land at HSIC for school purposes.
- **The vast majority of the surveyed Lambton High School community (83%) say that the proposed basketball centre should NOT be built on the land next to the school.**
- **Lambton High School Parents and Citizens Association asked that this proposal be rejected and that an alternative site be found for the basketball centre.**

Lambton High School

Lambton High School is a large comprehensive high school with approximately 1175 students and over 80 teachers, plus senior executive team and over 24 support staff. It is a highly successful school with an excellent academic and sporting record. According to the NSW Department of Education “The students at the school achieve academically above state averages in national and state tests and have achieved recognition through the Minister's Awards for Excellence in Student Achievement, Future Leaders' National Environment Awards, representation in the National Youth Science Forum, National Sporting Championships and the State Envirothon.”

The southern boundary fence of the school is the suburb boundary between Lambton and New Lambton. This boundary is also the boundary between the school and Wallarah and Blackley ovals, which are proposed to be developed as the Hunter Indoor Sports Centre (HISC) by Basketball Association of Newcastle. Lambton High School is in the suburb of Lambton but the ovals are in New Lambton.

Lambton High School has:

- A covered outdoor sporting areas with two full size basketball courts
- A large multi-purpose centre (MPC) that is used for indoor PE and sport including basketball
- two half-court basketball courts (seen as the blue outdoor courts in figure 1)

The school currently has four full size basketball courts and two half size basketball courts. The school DOES NOT have any oval or large grassed area suitable for use as a sports field and play that involves kicking balls. The school ground are also small for a school of this size, with large areas of the school ground ‘out of bounds’ to kids for safety reasons (eg staff car park) or have limited access such as the front lawn which is set aside for special needs children only.

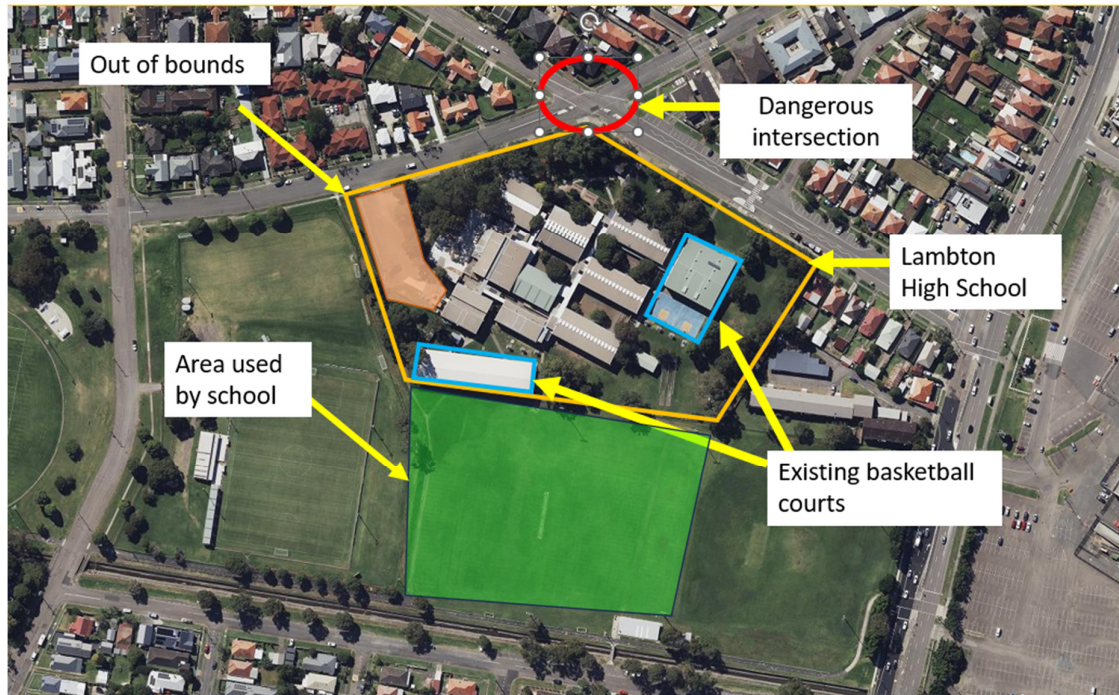


Figure 1. Lambton High School

Existing school use of Wallarah and Blackley Oval.

Since the school was established in the 1970's the school has had a formal agreement and paid fees/rent to Council to use Wallarah and Blackley Oval for school activities on school day throughout the school year. There is a gate between the school and these ovals, the school use of the ovals is so common and regular that many people in the community would be surprised to learn that the school does not own or have formal responsibility for these ovals.

Generations of Lambton High students have used Wallarah and Blackley oval for:

- Emergency evacuation zone
- Learning for students from year 7 -12 a range of subjects including; PDHPE and SR
- Free play at lunch and recess – including all play involving kicking balls
- Formal school Sport every Wednesday (for things such as)
 - AFL
 - Rugby League
 - Rugby Union
 - Soccer
 - Athletics
 - Cricket
 - Walking
- School fun events such as the annual Colour Run and Cross-Country carnival.
- Training for school sports teams and events
- Free play before and after school

The benefits of free play, greenspace, and lack of crowding are well documents benefits to learning and education. Free play, greenspace, the ability to run and kick a ball also contribute enormously to the physical and mental wellbeing of student. This is well documented in academic literature and by

leading organisation such as UNICEF (<https://www.unicef.org/armenia/en/stories/necessity-urban-green-space-childrens-optimal-development>) and is supported by the lived experience of parents and teachers. Lambton High's easy access to the two ovals has enable the School to provide opportunities to the students that have enhanced their learning and their physical and mental wellbeing, that would not be available without the easy access to the ovals.

The physical and mental wellbeing of the future student population has not been considered in the EIS or the Social and Economic Impact Assessment. While the EIS says there maybe benefits to the basketball playing community from the development it is our view that there will in fact been a loss in physical activity or mental wellbeing for the future students of Lambton High.

Implications and Recommendation

The EIS and SIA does not acknowledge the existing use of the two ovals adequately. It ignores the formal agreement between City of Newcastle and Lambton High School. The use of the land by the students and staff of Lambton High for about 200 days a year has not been considered in any data showing the existing use of the land.

The EIS incorrectly asserts that there will be an increase in use of the land if the proposal goes ahead. This statement that there will be an increase in use of the land cannot be justified as there has been no attempt to quantify the existing use or users, therefore it is not possible for the proponent to say there will be an increase in use.

The School Community

Lambton High School draws its students from a diverse area within the city of Newcastle. In addition to the many students from out of the zone who also attend the school, the school draws students from the suburbs:

- New Lambton
- North Lambton
- Lambton
- New Lambton Heights
- Rankin Park
- Elmore Vale

The Lambton High School current and future community, of students, staff, parents and carers are major stakeholders and users of Wallarah and Blakely Oval. The process for developing this proposal has not adequately identified or address the needs of the current and future school community and the impacts of the proposal on the school community will be significant and last for generations. These impacts have not been addressed adequately in the EIS or the proposed mitigation measures. Those mitigation measure that are proposed have not confirmed or formalised at all and there is no mechanism for ensuring their delivery.

The proponent has misrepresented the community engagement with the school community. A one-sided information only session was held at the school, which provided no opportunity to give input or feedback. There has been no attempt to engage with the student population or the families from the wider school catchment zone suburbs, whose children will attend the school in years and decades to come.

The school community is expected to grow as the population of Newcastle and the school catchment grows. The EIS does not use the most recent government growth projections which were updated in 2024 for either the adjacent Broadmeadow precinct, or for the suburbs within the school catchment zone.

The school population is expected to grow and as a result the school yard will become more crowded. A crowded school is at risk of reduced student and staff wellbeing and fitness, and has the potential to have increased levels of student conflict.

When the school community learned about the proposal to cancel the agreement with the school and have a basketball centre build on the ovals the P&C undertook a survey of the school community to find out if there was support or opposition to the proposal. Members of the school community attending parent teacher interview evening events were surveyed and provided some information about the proposal drawn from media releases. Over only two evenings **377** members of the school community (mostly parents and carers) did the survey. The questions and findings are shown in the table and figure below:

Questions	No. of responses	Yes	No	Unsure
Before reading this flyer were you aware of the proposal for the Basketball Stadium adjacent to Lambton High School?	377	53.0%	47.0%	0.0%
Were you aware that Lambton High School currently rents the fields adjacent to Lambton High School for the PE programs, from Newcastle City Council?	368	37%	63%	0
Should a Basketball Stadium be built next to Lambton High School?	372	15%	83%	1%

Survey respondents were also asked *‘Can you rate the impact for your student(s) of losing access to the playing fields on a scale of 1-10 where 1 is no impact and 10 is a high adverse impact. As shown in the figure below that vast majority of respondents rated the impact is high, with 55% giving the highest impact rating of 10.*

Total Lambton High School Response: Impact of Basketball Stadium on Lambton High School Students - Parent Survey 2023

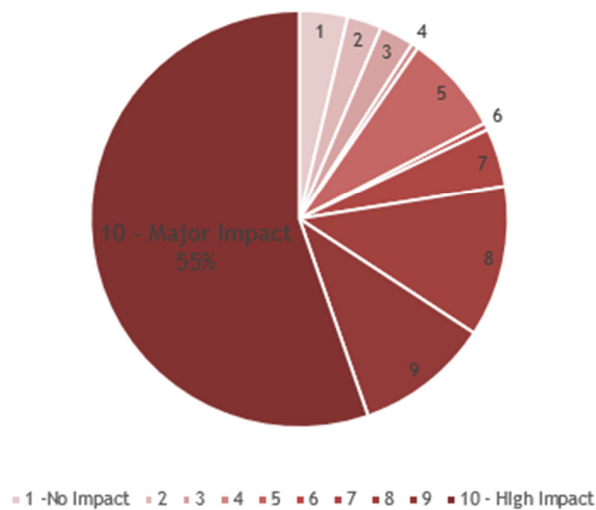


Figure 2. Responses to 'Can you rate the impact for your student(s) of losing access to the playing fields on a scale of 1-10 where 1 is no impact and 10 is a high adverse impact'.

Respondents to the survey raised the following concerns about the loss of the ovals.

Impact on Students Sport and PDHPE Development

- Sport Curriculum heavily affected – sport or PE, PDHPE or S&R classes offered every period across cohorts 7-12
- Direct Loss of playing fields - 1,200 students at full capacity
- Reduction in sport and sport options able to be provided
- Less free sport options. Increased cost impact for parents for off-site sports (bus fee, activity fee).
- Availability of access to other venues is limited and involved crossing roads or bus travel.
- New facility will provide only limited indoor access for some sports
- Students with mobility challenges may not be able to travel off campus easily

Traffic & Congestion

- Additional traffic and safety risk on Young Road
- Parking & traffic congestion is already a problem when school events are held
- Increased noise from traffic congestion
- Parking issues when all venues operating simultaneously

Community & Other Concerns

- Loss of amenity for junior soccer and cricket
- Parking congestion
- Increased risk of localised flash flooding

Health and Safety

- Overcrowding causing conflict and reduced play options in school yard
- Increase work for teachers
- Dust, vibration & noise – impacting teaching & asthmatic students/teachers – especially during tests, exams and performances
- Duration of works (noise and vibration) may go on for years due to multi stages approach to construction– impacting teaching
- Rubbish/environmental impact of works
- Emergency evacuation points affected
- Vehicle access for students/parents/teachers will be impacted.

The EIS says that the ‘overall feedback was positive and supportive of the objectives of the proposal’. There is **no evidence** provided to show this is true and the scope and nature of the community consultation undertaken was extremely limited and heavily biased towards the existing basketball playing community. The survey undertaken by the P&C shows there is a high level of concern that the development of the ovals will have a major adverse impact on the school community.

The only drop-in session were held at the existing basketball stadium and the general community (including the school community) was totally unaware of any opportunity to make submission or comments. The school community felt they were not provided with timely or accurate information. Data about information and drop in session attendance cannot be verified and is believed to be inaccurate.

Implications and Recommendation

The Social and Economic Impact Assessment (Appendix II of the EIS) does not correctly identify the Social Locality or the Social Baseline for the proposal (as required by the *Social Impact Assessment Guideline*). It is completely wrong not to consider all the suburbs within the catchment of the High School and the current and future school community.

The *Undertaking Engagement Guidelines for State Significant Projects* was not adhered to and the proponent has either ignored or misrepresented the issues of concern to the school community. The limited community engagement was largely focused only on information provision not consultation and was heavily biased towards the existing basketball playing community.

The Social and Economic Impact Assessment (Appendix II) uses out of date population projection data and does not account for the anticipated growth in the school community population.

The school community does not support the building of HISC on Wallarah and Blakely ovals.

Proposed use of HISC by the school community

The EIS suggest that Lambton High may be able to use the HISC for some teaching and learning. It does not specify which of the existing school uses of the ovals could be replaced by use of HISC. As stated above the school already has numerous basketball courts but does not have an oval.

HISC could NOT be used for the following activities that will no longer be possible (or will required additional cost, effort and time) if the school cannot longer use access to Wallarah ovals.

- Emergency evaluation area
- Free play at lunch and recess for people wanting to kick balls
- AFL
- Soccer
- Rugby Union
- Rugby League
- Athletics and Cross country

There is no agreement in place between the Department of Education and HISC to guarantee access to the HISC to the school. There is no information provided about the term, duration, activities or cost for the use of the HISC by the school.

Other issues of concern

- We reject the suggestion that the development will have a positive benefit for the site or the community. **The loss of greenspace for both the school and the community will be permanent and irreplaceable.**
- The development on the ovals will reduce opportunities in the community for children to play outdoor sports such as cricket, soccer, ALF, and the various rugby codes, either formally, socially or just as play. There will be added cost and burden to local parents/carers who will have to take their children out of the local community to play these sports in the future.
- The visual amenity of the school neighbourhood will be negatively impacted by the loss of the trees and greenspace. The statement in the EIS that there will be a positive contribution to the surrounding streetscape is unsubstantiated. How could a huge building and large car park possibly be more visually appealing than the open greenspace that currently exists on the site?
- Wallarah and Blakely oval are currently available for the whole community to use free of charge for many hours each day. The ovals are used by a diverse range of local people for a diverse range of purposes. If the ovals are developed as HISC, then only people who can afford to pay will be able to get full use of this land. The construction of HISC will reduce social equity and increase the cost burden on local people for recreation.
- The area is highly susceptible to both flash flooding and major flooding. Such as significant reduction in permeable surfaces in the area will increase stormwater flows in and around the site and result in more flash flooding on the roads around the school. Flash flooding is already a major problem and it is highly likely this development will increase this problem as it will increase the runoff and increase the number of people and vehicles using the area. The flash flooding blocks the access roads to and from the school and creates significant risks and traffic problems.

Impacts and Mitigations

The P&C does not believe that the proponent:

- Had adequate baseline data to make informed or accurate assessment of impacts on the school community or to formulate meaningful mitigation measures.
- Considered the cumulative impacts on the school community and the cumulative impacts of all the proposed changes within the local area, including plans for further development at Macdonald Jones Stadium and throughout the Broadmeadow precinct.
- No detailed contingency plans have been developed to avoid, mitigate or offset impacts or reduce risks. Many of the mitigation measures relevant to the school community are at best only ideas, and there is not mechanism to ensure they are delivered over the life of the project or operation of the HISC over decades.

The table below sets out our concerns with the way the impacts have been identified and why we think the mitigation measures are incorrect or inadequate.

Issue	Impact on the school	Why mitigation is inadequate or incorrect
Traffic, transport and parking	<p>The traffic studies and management plan do not accurately show the increased use of Young Road by through traffic leaving the HISC during both the construction and operations of the HISC.</p> <p>The impact of left turn in and left turn out only access to and from the HISC will force/encourage all south and west bound vehicles use Young Road going directly in front of the school, as they either head towards Newcastle Link Road or towards Hobart Road. The intersection of Young Road and Womboin Road is already a very dangerous intersection with no safe crossing for students and a complex and poorly understood 4-way stop.</p> <p>The P&C has repeatedly raised safety concerns about the intersection of Young and Womboin Rod with City of Newcastle. Increase vehicle use of this intersection (during construction and operations) would increase the risk of a student being involved in an accident as either a pedestrian or in a vehicle.</p> <p>The traffic study does not account:</p>	<ul style="list-style-type: none"> • There is no mitigation measure provided to address this increased risk of an accident on Young Road, especially at the intersection of Young Road and Womboin Road, resulting from increased traffic in Young Road. • There is no mention of any requirement or willingness to coordinate major events with the school which also holds events. • The proposed mitigation measure of encouraging public transport and active transport use is unlikely to achieve any meaningful reduction as the public transport is extremely limited, especially on weekends and evenings, and does not

	<ul style="list-style-type: none"> ▪ Parking and movement of staff and student vehicles, and parent for major school events such as parent teacher evenings, graduation, music and drama evening. Where parking is already under pressure and people are forced to park in the residential side streets. ▪ Impacts on staff and student parking when Young Road is closed for major events. <p>The EIS suggests the location is well services by public transport. This is highly misleading because the bus and train services (while existing) have very limited timetables and do not enable easy access from many parts of Newcastle Lake Macquarie, Port Stephens or Maitland. Many of the bus services do not run on weekends or evenings. For example the 132 bus mentioned in the EIS, is really only a school bus and only runs once in the morning and once after school on weekdays, and not at all on weekends. The train timetable is extremely limited on weekend and evening and it is not considered safe to walk to or from the train station at night through an isolated and poorly light area. Therefore the majority of people attending HISC would not be able to use public transport to get to the site.</p> <p>The proposal plans to have construction and delivery vehicles to all occur in the mornings, which is the peak period of school students and staff arriving in the area, via public transport, walking, cycling and private car.</p>	<p>connect to many areas that the HISC is expecting to draw people from.</p> <ul style="list-style-type: none"> • It is not safe for women or young people to walk 23mins to or from Broadmeadow Station in the evenings and at night. • The impact of major event parking is not adequately addressed or mitigated, especially as MacDonald Jones Stadium is looking to reduce the amount of parking it offers, and there is already a significant impact on the school community when major events take place. There is no formal long term agreement to enable HISC visitors to use the Macdonald Jones Stadium parking area. • The proposal to have construction and operations deliveries occur in the mornings will increase risk to students and staff.
Noise and Vibration	<p>The entire school community are ‘sensitive receivers’ of the impact of noise and vibration. The construction plan states that the majority of work will be done during school hours and on school days. There has been no attempt made to reduce the impact on the school community by stating that high impact activities should occur only during school holidays or on weekends.</p> <p>Noise and vibration will have a significant impact on students when they are undertaking assessments, tests and exams.</p>	<ul style="list-style-type: none"> • Work should be scheduled to avoid peak school days and times. • High impact construction should only be allowed during school holidays. • No impacts should be occurring during assessment periods, especially senior student exams and assessment.

Visual impacts	The EIS states that there will be a high impact on the school community from changes to visual amenity. The school will lose the green open space outlook and this will be replaced by an 18m high wall of building, totally changing visual amenity. It is ridiculous to suggest that a large building and a car park is an improvement in visual appeal compared to the existing large green open space.	<ul style="list-style-type: none"> No mitigation measure is provided to address the loss of visual amenity for the school community.
Wind	The construction of the huge building next to the school has the potential to create a wind tunnel effect between the HISC and the school.	<ul style="list-style-type: none"> No assessment or mitigation has been done on the potential for an unpleasant wind tunnel to be created by the development.
Flood	Flash flooding is already a major problem on the access roads to the school and the ovals. It does not take very much heavy rain before there is flash flooding on Turton Road, Newcastle Link Road, Wallarah Road and many other backstreets in the neighbourhood. This flash flooding causes significant risks and traffic chaos. The impact of both climate change and the increase in permeable surfaces in the Lambton Ker-ri Creek catchment, due to this development and increased urban density across many suburbs, does not appear to have been adequately addressed. Wallarah and Blackley ovals currently act as important sponges absorbing and holding water in storm events. The construction of HISC will increase runoff and therefore increase the risk of flash flooding on the access roads around the school.	<ul style="list-style-type: none"> No mitigation measure is provided to address the increase in flash flooding on access roads around the school.
Loss of school sport, learning and play area	<p>The EIS fails to acknowledge that the School has a long term formal agreement to use Wallarah and Blackley Ovals. The EIS fails to qualify the existing uses of the land or the users of the land, by all current and future users, especially the school community.</p> <p>The EIS fails to acknowledge or address the nature, scale or implications of the loss of the Ovals to the school. The Social and Economic Impact Assessment (Appendix II) fail to adequately mention that there will be:</p> <p>loss of physical activity for the students both through formal and informal use of the land and that this could lead to reduced fitness and mental wellbeing for students.</p> <p>Increased work for staff</p>	<ul style="list-style-type: none"> The assertion in the EIS that there will be an increase in use of the land the ovals are on is not substantiated with any evidence. Therefore all of the statements that say there will be a benefit from increased use cannot be considered valid as there may well be a net loss in use. The school already has two half court basketball courts and an undercover sports area, so there is no

	<p>Reduced learning times Students with complex needs will be less likely to have access to ... due to</p>	<p>demand for these facilities as suggested by the EIS. Adding additional half courts to the area will not mitigate the loss of the use of the oval as the ovals are used for totally different sports being AFL, Rugby Union and Rugby League, cricket and soccer.</p> <ul style="list-style-type: none"> • No alternative school emergency evaluation area has been nominated or provided for. • The proposal fails to provide any mitigation for the loss of lunch time and recess free play areas or account for the resulting loss of fitness or wellbeing in the school population. •
Social	<p>As outlined in this submission the social impact assessment for this project is based on a totally flawed assessment of the Social Locality, very poor community engagement and inadequate and inaccurate Social Baseline data.</p> <p>The EIS and SIA does not adequately acknowledge or quantify the current diverse uses of Wallarah and Blakely ovals. A lot of the EIS is written from the perspective of the land currently having low use which is not the case.</p> <p>The CN report that says the ovals are underutilized was fundamentally flawed and did not consider the school use or general public use. Wallarah and Blakely Ovals are currently used by a diverse general public and school student for free.</p> <p>The impacts on the large school community have not been adequately addressed at all. Issues of concern to the school community are outlined above.</p>	<ul style="list-style-type: none"> • Access to HISC by Lambton High School will not compensate or replace the loss of the ovals and greenspace. • HISC will not be able to be used for most of the sports that will no longer be able to be offered. • HISC will not be able to be used for lunch time and recess free play. • Because additional staff are required to supervise students crossing roads and going off school grounds it is highly likely that there will be a noticeable reduction in use of ovals for learning and classes and sports.

	<p>Reduced equity Currently the Ovals can be used by all student of Lambton High School at no cost to the individual student, before or after school and during holidays. HISC will require people to pay to use the facility and this will result in a loss of opportunity for kids without the means to pay the fees. This will increase inequity in the community.</p> <p>Wellbeing increased by greenspace Research is showing that the mental health of adolescence is on decline. Access to greenspace, physical and sports are one of the well documented ways to improve mental health in adolescence. There is a wide range of academic information that shows increased in education outcomes and wellbeing from access to green space and high levels of physical activity for young people. Some of this is referenced in the EIS. Reducing greenspace and sports opportunities for the school community may have negative impacts on the wellbeing of the student population. The EIS and SIA did not address the potential negative impacts on the student population.</p>	<ul style="list-style-type: none"> • Time taken to walk to Ford Oval would mean use of this oval for class activities would be impractical in a 40min class period. • Parents or the school are likely to have to pay additional costs to travel to places where sports like AFL, Soccer and Rugby can be played, as free Wednesday Sport options will be reduced. • Construction period is the peak school use time, which means the impacts on the school community will be increased. See details above. • Also see above for comments on construction vehicle deliver time being a peak school access times.
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Conclusion

Lambton High School P&C asked that the development of HISC on Wallarah and Blakely ovals be **rejected**, as it is not in the interests of the school community and the impacts on the school community have not been accurately described in the EIS nor have they been effectively mitigated by the suggested mitigation measure.