

Dear Minister Scully

Thank you for the opportunity to make a submission to the Hunter Indoor Sports Centre (HISC) proposal (Application Number: SSD-65595459<sup>1</sup>)

## SUMMARY

I do not support this development proposal in this location on the following grounds:

### 1. OWNERSHIP, MANAGEMENT AND MAINTENANCE

- The proposal is **silent on exactly which entity will be responsible for the ongoing ownership, management and maintenance** of any structures constructed on community land under the care and control of Council, in this case the City of Newcastle (CN).
- There is no clarity of what future governance structures and business planning has been considered for such a large structure.
- It is foreseeable that there will be significant ongoing management and maintenance costs for the HISC, even if only Stage 1 is completed, and particularly if all of the proposed stages are completed.
- This has the potential to significantly impact on future CN budgets and negatively impact on the provision of other community facilities and services within the CN budget and across the entire Newcastle LGA.
- Financial sustainability and sustainable facility management<sup>2</sup> have always been an issue for local governments.
- The NSW Flood Inquiry<sup>3</sup> noted that the insurance industry and banks are strong risk managers and are not likely to support future development re-building in high-risk areas and floodplains. Future developers seeking finance for development of the Broadmeadow floodplain are likely to experience similar insurance and fiscal constraints.
- Local government will not be exempt from these insurance and fiscal constraints.
- Councillors and ratepayers need to be fully advised and informed of any future financial commitments and impacts.

### 2. STRATEGIC PLANNING

There has been extended community engagement over at least the past decade and the HISC proposal does not align with the strategic direction as developed with local community input and adopted by CN over the past decade.

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<sup>1</sup> <https://www.planningportal.nsw.gov.au/major-projects/projects/hunter-indoor-sports-centre-hisc>

<sup>2</sup> City of Newcastle, Parkland and Recreation Strategy, 2014, [https://newcastle.nsw.gov.au/getmedia/1c37d589-dda6-4187-b00c-1e2e22a51626/Parkland\\_and\\_Recreation\\_Strategy.pdf](https://newcastle.nsw.gov.au/getmedia/1c37d589-dda6-4187-b00c-1e2e22a51626/Parkland_and_Recreation_Strategy.pdf)

<sup>3</sup> NSW Government, 2022 Flood Inquiry Volume Three: Appendices, Lismore Case Study: An off the scale event, [https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME\\_THREE\\_Appendices\\_1.pdf](https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME_THREE_Appendices_1.pdf) page 48

### 3. SOCIAL IMPACT ASSESSMENT

The Social and Economic Impact Assessment prepared for this proposal is totally inadequate and reads as a paean to why the BANL proposal should be supported rather than a meaningful consideration of identifying, evaluating and responding to any current or future social impacts in a timely, inclusive and respectful manner.

The cumulative loss of sportsgrounds will impact particularly on the main sporting groups such as football<sup>4</sup> (soccer) which has the highest proportion of participation (27.5%) in the LGA and cricket (13.7%).

The cumulative loss of open space and sportsgrounds is significant, unacceptable and will have a negative social impact on the residents and sporting groups of Newcastle with no feasible mitigation offered.

The remaining open space available for public use after Stage 2 could only be considered to be tokenistic and due to its location and subsequent lack of passive surveillance, at an increased risk of anti-social behaviours.

### 4. FLOODING

Flooding is a significant existing constraint in Broadmeadow.

The proposed development site is a known floodway, flood storage and flood fringe site<sup>5</sup> and there is no apparent integration with or in-depth consideration of the broader Broadmeadow catchment.

The EIS<sup>6</sup> notes that for an extreme flood event, most of the site will be inundated, including the potential for internal flooding of the building.

The NSW Flood Inquiry<sup>7</sup> has highlighted that the insurance industry and banks are strong risk managers and are not likely to support future development re-building in high-risk areas and floodplains.

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<sup>4</sup> City of Newcastle, Strategic Sports Plan, 2020, p.13 <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan.pdf>

<sup>5</sup> BMT WBM, June 2012, *Newcastle City-Wide Floodplain Risk Management Study and Plan Compendium of Maps, prepared for the City of Newcastle. Map 5-E.*

<sup>6</sup> Torrent Consulting, *Hunter Indoor Sports Centre, Flood Emergency Response Strategy*, July 2024, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240919T095628.348%20GMT>

<sup>7</sup> NSW Government, 2022 Flood Inquiry Volume Three: Appendices, Lismore Case Study: An off the scale event, [https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME\\_THREE\\_Appendices\\_1.pdf](https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME_THREE_Appendices_1.pdf) page 48

## THE PROPOSAL

The State Significant Development Application (SSDA) is seeking approval for<sup>8</sup>:

- *Site layout including carpark and landscaping.*
- *A single storey plus mezzanine basketball complex configured as eight (8) courts with amenities, administration spaces and retail tenancy, mezzanine level function rooms, administration space and training areas and an additional three (3) courts including show court with retractable grandstand seating and high-performance training facilities (teaching space and gym).*
- *Indicative GFA of up to 17,700m<sup>2</sup>, comprising ground floor of approximately 15,300m<sup>2</sup> and first floor mezzanine of 2,400m<sup>2</sup>.*
- *Civil works including construction of new vehicular access and egress point to Turton Road and an internal roadway.*
- *Demolition of existing amenities block*
- *Site remediation.*
- *Service infrastructure provision.*
- *Car park with 205 spaces.*
- *Site landscaping and pedestrian paths.*
- *Building and site signage.*
- *Subdivision to incorporate an additional piece of land into the overall site.*

The proposal is staged so that the project can be delivered as an initial block of six courts with subsequent additions to be delivered over several construction stages<sup>9</sup>.

### Stage 1A

- *A single storey plus mezzanine building with total GFA of approximately 10,218 m<sup>2</sup> comprising:*
  - *Ground floor: 6 x basketball courts, amenities to support the functioning of the complex including bathrooms, change rooms, lobby and foyer, retail tenancy and café.*
  - *Car park with 145 spaces*

### Stage 1B

- *Ground floor extension to the west to provide 2 x courts in the general configuration delivered in Stage 1A with a GFA of approximately 1,630 m<sup>2</sup>.*

### Stage 2A

*Extension to the northern side of the existing building with total additional GFA of approximately 5,269m<sup>2</sup> comprising:*

- *Ground floor 3 x courts including Show court with retractable grandstand seating over the 2 adjacent courts*
- *Mezzanine level: extension of mezzanine to provide additional corporate spaces*
- *Expansion of existing carpark to provide 205 spaces*

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<sup>8</sup> Urbis, Scoping Report, Hunter Basketball Stadium, December 2023,

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240108T043319.777%20GMT>

<sup>9</sup> Ibid, section 3

**Stage 2B**

*Ground floor extension to the southern side of the building to provide 1 x court plus high-performance training area with an additional GFA of 1,911m2..*

The staging approach is stated to be dependent on available funding. The applicant BANL is stated to be committed to delivery of the full proposal subject to allocation of additional funding. Estimated construction start date for construction of the first stage is April 2025.

**GROUND ON WHICH I OBJECT**

I have outlined several objections below.

**1. ONGOING OWNERSHIP, MANAGEMENT AND MAINTENANCE OF THE HISC – FINANCIAL IMPACT FOR THE CITY OF NEWCASTLE AND RATEPAYERS**

The Applicant is the Basketball Association of Newcastle Limited (BANL).

The site is Crown Land (Lot 2380 DP755247, Lot 2379 DP755247, Lot 2378 DP755247, Lot 2377 DP755247, Lot 7034 DP755247).

Landowner's consent was provided by the NSW Minister for Lands and Property Stephen Kamper on 12.08.2024

This site is Crown Reserve 72941, gazetted on 7/1/1949, and identified in the Crown Land Plan of Management<sup>10</sup> as sportsground under the community land classification category. The CN Sportsland POM<sup>11</sup> identifies the site as a district level sportsground.

The *Crown Land Management Act 2016* (CLM Act) authorises local councils appointed to manage dedicated or reserved Crown land, to manage that land as if it were public land under the *Local Government Act 1993* (LG Act). CN manages this land as if it were community land.

Currently funding is only available for Stage 1A of the proposal (\$25 million grant from NSW Government).

The total area of proposal (Stages 1A – 10,218m<sup>2</sup>, 1B – 1,630m<sup>2</sup> & Stage 2 – 7,180m<sup>2</sup>) is 19,028m<sup>2</sup> GFA (Gross Floor Area). This equates to a building that essentially has 1.9 ha under cover.

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<sup>10</sup> City of Newcastle, 2020 (Version Oct 2023) Crown Land Plan of Management, Appendix 1, p.87, <https://newcastle.nsw.gov.au/getmedia/cc5a51ac-19fa-42d7-a948-8d42cd4d11e8/Crown-Lands-Plan-of-Management-2023.pdf>

<sup>11</sup> City of Newcastle, Sportsland Plan of Management, 2003, amended 2014, <https://newcastle.nsw.gov.au/getmedia/316935ed-f5d3-4b65-af01-e086f6517f74/Sportslands-PoM.pdf>

The Estimated Development Cost<sup>12</sup> for all stages of the proposal is \$82.6 million excluding GST. A similar sized proposal, the Sunshine Coast Indoor Sports Centre<sup>13</sup> has 11 courts and a larger show court seating 6,000 and is currently costing at \$142 million.

- The proposal is **silent on exactly which entity will be responsible for the ongoing ownership, management and maintenance** of any structures constructed on community land under the care and control of Council, in this case the City of Newcastle (CN).
- There is no clarity of what future governance structures and business planning has been considered for such a large structure.
- It is foreseeable that there will be significant ongoing management and maintenance costs for the HISC, even if only Stage 1 is completed, and particularly if all of the proposed stages are completed.
- This has the potential to significantly impact on future CN budgets and negatively impact on the provision of other community facilities and services within the CN budget and across the entire Newcastle LGA.
- Financial sustainability and sustainable facility management<sup>14</sup> have always been an issue for local governments.
- The NSW Flood Inquiry<sup>15</sup> noted that the insurance industry and banks are strong risk managers and are not likely to support future development re-building in high-risk areas and floodplains. Future developers seeking finance for development of the Broadmeadow floodplain are likely to experience similar insurance and fiscal constraints.
- Local government will not be exempt from these insurance and fiscal constraints.
- Councillors and ratepayers need to be fully advised and informed of any future financial commitments and impacts.
- Both the NSW Government and BANL need to be upfront on future costs, who this may be shifted onto and how this will be managed.

## 2. STRATEGIC PLANNING

The City of Newcastle exhibited a draft *Social Infrastructure Strategy* (SIS) September-November 2022 and it was listed as a key informing strategy on the CN website in early 2024. The draft SIS is also consistently referenced in a number of other CN strategic planning policies and plans however it has not yet been adopted. An adopted SIS would be useful in ensuring inform the planning, investment, negotiation and delivery of social infrastructure for our city.

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<sup>12</sup> HISC EIS, Appendix G, APLAS, Estimated Development Cost (Sept 2024)

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240919T100437.407%20GMT>

<sup>13</sup> Queensland Government, media release 24 July 2024, *Works for new \$142m Sunshine Coast Indoor Sports Centre now out to market*, <https://statements.qld.gov.au/statements/100901>

<sup>14</sup> City of Newcastle, Parkland and Recreation Strategy, 2014, [https://newcastle.nsw.gov.au/getmedia/1c37d589-dda6-4187-b00c-1e2e22a51626/Parkland\\_and\\_Recreation\\_Strategy.pdf](https://newcastle.nsw.gov.au/getmedia/1c37d589-dda6-4187-b00c-1e2e22a51626/Parkland_and_Recreation_Strategy.pdf)

<sup>15</sup> NSW Government, 2022 Flood Inquiry Volume Three: Appendices, Lismore Case Study: An off the scale event, [https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME\\_THREE\\_Appendices\\_1.pdf](https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME_THREE_Appendices_1.pdf) page 48

The development proposal only occasionally references the draft *Broadmeadow Place Strategy* (BPS) as exhibited. The BPS however consistently shows the Wallarah Crown Reserve site as green space. Given the significant population growth proposed for Broadmeadow, existing green space will be required and increasingly valuable.

The Draft *Hunter Sport and Recreation Plan* (2018- 2023) prepared by the Office of Sport contains strategies relevant to CN's Strategic Sports Plan<sup>16</sup> (adopted 2020). These included

*Establish a Regional Sporting Hub at the Hunter Sports and Entertainment Precinct at Broadmeadow and explore locations for sub-hubs*

The CN Strategic Sports Plan<sup>17</sup> also notes specific recommendations for the Blackley and Wallarah Oval No 1-2

*Revisit the provision of cricket at this facility, in consideration of the planning for the Football CoE and non-compliance with CA standards. Relocate cricket to an alternative venue if pitch removed.*

Neither of these CN adopted recommendations appear to have been considered in the HISC proposal.

There has been extended community engagement over at least the past decade and the HISC proposal does not align with the strategic direction as developed with local community input and adopted by CN over the past decade.

### **3. SOCIAL IMPACT ASSESSMENT (SIA)**

The Social and Economic Impact Assessment prepared for this proposal is totally inadequate and reads as a paean to why the BANL proposal should be supported rather than a meaningful consideration of identifying, evaluating and responding to any current or future social impacts in a timely, inclusive and respectful manner.

Whilst the *Social Impact Assessment Guidelines* (DPIE, 2023) are noted <sup>18</sup>, they are not comprehensively addressed.

There is no consideration of what other uses the site is suitable for as already noted under strategic planning.

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<sup>16</sup> City of Newcastle, Strategic Sports Plan, 2020, <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan.pdf>

<sup>17</sup> City of Newcastle, Strategic Sports Plan, 2020, <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan.pdf> p.31

<sup>18</sup> HISC EIS, Appendix II LCG Solutions, Social and Economic Assessment, Newcastle Indoor Sporting Centre, p.11 accessed at <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240919T090700.199%20GMT>

There is no consideration of the potential impacts of visitation numbers to the HISC as outlined in the scoping report<sup>19</sup>. If the proposal is completed, weekly visitation will be between 15,000 – 22,500 people

There is no consideration of how the draft *Broadmeadow Place Strategy* may impact on the site proposal eg population growth, links and circulation involving a very busy road

There is potential distributional inequity both now and into the future that is not considered or addressed at all.

The document does not address the loss of access to sporting ovals and recreational open space for either local or regional user groups (eg sporting groups, Lambton High School students) and residents.

The current user groups, their participation and usage of the sportsground is not identified.

The provision of a market analysis (from ActiveXchange) on unmet future need for basketball courts does not address the loss of sporting fields for current users in 2024 and into the future.

There is no consideration of the cumulative impacts of the loss of sporting fields, only a statement that CN is to facilitate relocation of users.

- An unanswered question is where exactly can these sporting users go?
- There is no remaining suitable unconstrained community land available anywhere within the Newcastle LGA.

The CN *Strategic Sports Plan*<sup>20</sup> notes that CN has 63 sports venues/ sites with a total land area of 370.5ha and that the playing space (Ha) or supply of playing fields<sup>21</sup> is 133.3 ha.

The proposal consistently refers to people being able to use adjacent sportsgrounds for open space purposes.

The draft *Broadmeadow Place Strategy* shows that proposed flood mitigation measures (flood detention and storage) are proposed for adjacent open spaces<sup>22</sup>.

- Arthur Edden Oval – the entire area of 2.4 ha will be excavated, and the ground level lowered to a depth of 2 metres with removed fill to be retained onsite. This field will no longer be suitable as a sportsground.
- Kentish Oval – the entire area of 2.4 ha will be excavated, and the ground level lowered to a depth of 1.5m with removed fill to be retained on site. This field will no longer be suitable as a sportsground.

The cumulative loss of open space will be:

- 23 ha if the draft *Broadmeadow Place Strategy* is implemented

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<sup>19</sup> Urbis, Scoping Report, Hunter Basketball Stadium, December 2023, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240108T043319.777%20GMT> section 3.1.2

<sup>20</sup> City of Newcastle, Strategic Sports Plan, 2020, p.12 <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan.pdf>

<sup>21</sup> Ibid Table 3

<sup>22</sup> Rhelm, May 2024, Housing the Hunter: a plan for renewal at Broadmeadow, Flooding and Water Cycle Management, prepared for the NSW Government, DPHI, Figure 6.1 (map) and Table 6.1 Flood Modification measures <https://shared-drupal-s3fs.s3.ap-southeast->



- 3.196 ha of Wallarah Oval
- This equates to 26.196 ha of open space lost within the Newcastle LGA, with a significant proportion being actual playing fields

The cumulative loss of sportsgrounds will impact particularly on the main sporting groups such as football<sup>23</sup> (soccer) which has the highest proportion of participation (27.5%) in the LGA and cricket (13.7%).

The cumulative loss of open space and sportsgrounds is significant, unacceptable and will have a negative social impact on the residents and sporting groups of Newcastle with no feasible mitigation offered.

The remaining open space available for public use after Stage 2 could only be considered to be tokenistic and due to its location and subsequent lack of passive surveillance, at an increased risk of anti-social behaviours.

#### 4. FLOODING

Flooding is a significant existing constraint in Broadmeadow.

The proposed development site is a known floodway, flood storage and flood fringe site<sup>24</sup> and there is no apparent integration with or in-depth consideration of the broader Broadmeadow catchment.

The EIS<sup>25</sup> notes that for an extreme flood event, most of the site will be inundated, including the potential for internal flooding of the building.

Rhelm<sup>26</sup> notes the precinct is flat, low lying and flooding begins to affect existing properties as frequently as the 10% AEP. In the PMF, flooding is widespread with only a few small areas of any significance remaining flood free and many areas have flood hazards extending to H5 & H6 classifications (risk to life and buildings). The BMT report<sup>27</sup> (2012) clearly demonstrates the extent of a PMF Flash Flood upstream from the Broadmeadow precinct and highlights the need to understand the entire catchment flood behaviours in the future.

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<sup>23</sup> City of Newcastle, Strategic Sports Plan, 2020, p.13 <https://newcastle.nsw.gov.au/getmedia/bcb5139c-bd4a-4ce0-9c45-8c5e5eb20830/4412-Strategic-Sports-Plan.pdf>

<sup>24</sup> BMT WBM, June 2012, *Newcastle City-Wide Floodplain Risk Management Study and Plan Compendium of Maps*, prepared for the City of Newcastle. Map 5-E.

<sup>25</sup> Torrent Consulting, *Hunter Indoor Sports Centre, Flood Emergency Response Strategy*, July 2024, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SD-65595459%2120240919T095628.348%20GMT>

<sup>26</sup> Rhelm, May 2024, *Housing the Hunter: a plan for renewal at Broadmeadow, Flooding and Water Cycle Management*, prepared for the NSW Government, DPHI, [https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/04.+Flooding%2C+integrated+water+management+strategy+-+exhibition+report.pdf](https://shared-drupal-s3fs.s3.ap-southeast-2.amazonaws.com/master-test/fapub_pdf/04.+Flooding%2C+integrated+water+management+strategy+-+exhibition+report.pdf)

<sup>27</sup> BMT WBM, June 2012, *Newcastle City-Wide Floodplain Risk Management Study and Plan Compendium of Maps*, prepared for the City of Newcastle



In the draft *Broadmeadow Place Strategy*, a post development flood model has been developed that requires essentially reengineering of the Broadmeadow/ Styx Creek flood plain with extensive capital works outlined (Rhelm<sup>28</sup>, 2024, section 6, Figure 6-1 & Table 6-1).

The majority of these works are required to be constructed within Stage 1 and include:

- Widening of Styx Creek
- Construction of all external to precinct flood storages by extensive excavation up to depths of 2 metres ie Arthur Edden Oval & Kentish Oval, Myers Park in Adamstown
- Construction of flood detention and storage areas by extensive excavation up to depths of 2 – 3.7 metres ie Smith Park, Knights Centre of Excellence, McDonald Jones Stadium, Woodville Junction and Newcastle Showground
- Construction of a range of diversion channels, culvert upgrades and duplications
- Raising of major roads – Lambton and Griffiths Roads
- Bridge widening
- Filling of some areas

Rhelm<sup>29</sup> (2024) notes that despite the proposed mitigation strategy in managing flooding, significant inundation remains across the precinct in a PMF event, even despite such extensive infrastructure works that basically entail a major re-engineering of the flood plain.

The HISC is silent on the extent of the works required in the draft *Broadmeadow Place Strategy* and how these integrate with the proposed development.

The release of the recent *Flood failure to future fairness* report<sup>30</sup> highlights and responds to the growing number of uninsurable properties at very high risk. The report recommends guiding principles for such intervention include the need for ongoing community and household level mitigation investment, and that no further development should occur in high-risk areas.

Specific recommendations<sup>31</sup> include:

- disclosure of flood risk levels through property conveyancing and rental agreements
- exploring regulatory mechanisms to discourage banks from financing new housing developments at a 1-in-100 flood risk or higher

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<sup>28</sup> Rhelm, May 2024, *Housing the Hunter: a plan for renewal at Broadmeadow, Flooding and Water Cycle Management*, prepared for the NSW Government

<sup>29</sup> Rhelm, May 2024, *Housing the Hunter: a plan for renewal at Broadmeadow, Flooding and Water Cycle Management*, prepared for the NSW Government

<sup>30</sup> Commonwealth of Australia, 2024, *Flood failure to future fairness*, House of Representatives, Standing Committee on Economics, [https://www.aph.gov.au/Parliamentary\\_Business/Committees/House/Economics/FloodInsuranceInquiry/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/House/Economics/FloodInsuranceInquiry/Report)

<sup>31</sup> *Flood insurance inquiry reports on industry failures*, Media Release, 18 October 2024, [https://www.aph.gov.au/About\\_Parliament/House\\_of\\_Representatives/About\\_the\\_House\\_News/Media\\_Releases/Flood\\_insurance\\_inquiry\\_reports\\_on\\_industry\\_failures](https://www.aph.gov.au/About_Parliament/House_of_Representatives/About_the_House_News/Media_Releases/Flood_insurance_inquiry_reports_on_industry_failures)

Once again, I highlight the NSW Flood Inquiry<sup>32</sup> which noted that the insurance industry and banks are strong risk managers and are not likely to support future development re-building in high-risk areas and floodplains.

Future developers seeking finance for development of the Broadmeadow floodplain are likely to experience similar insurance and fiscal constraints

## CONCLUSION

Thank you for the opportunity to comment on these proposals. I reiterate that I do not support this development in this location.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sandra Feltham', is written over a light blue horizontal line.

Sandra Feltham

BSc (Human Geography), Grad. Dip Planning, MPH

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<sup>32</sup> NSW Government, 2022 Flood Inquiry Volume Three: Appendices, Lismore Case Study: An off the scale event, [https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME\\_THREE\\_Appendices\\_1.pdf](https://www.nsw.gov.au/sites/default/files/noindex/2022-08/VOLUME_THREE_Appendices_1.pdf) page 48