

11 November 2024

Department of Planning and Environment

Exhibition of State Significant Development

Application No: SSD-65595459

Location: 2 Monash Road and 24 Wallarah Road, New Lambton

Applicant Basketball Association of Newcastle Limited (BANL)

Attention: Mr Navdeep Shergill

Dear Navdeep,

I am writing to voice my **objection** to the location of the proposed development in the following capacity;

- Long term (since 1994) owner and resident of 51A Durham Road, Lambton,
- Part owner with partner, Janice Martin, of 124 Womboin Road, Lambton,
- As a professional consultant town planner of some 35 years.

I acknowledge and accept that BANL have outgrown their existing site within the Broadmeadow Precinct and need to find an alternative location with an urgency to relocate exacerbated by the State Government whom require the site for housing development as part of the vision of the Broadmeadow Place Strategy to create up to an additional 20,000 homes.

Right Development Wrong Location

1. The proposal is inconsistent with the provisions of the **Hunter Regional Plan 2041 – Broadmeadow regionally significant growth area** - *"Planning for Hunter Park and Broadmeadow The NSW Government wants Hunter Park to be the first choice for sporting, leisure and entertainment as well as an important precinct for new homes and jobs close to Broadmeadow Station. The Hunter Park Urban Regeneration Program will transform*

underutilised government-owned lands into a nationally significant sporting and entertainment destination within a new urban precinct"

- Place strategy outcomes – "5. Nationally significant precinct– Leverage upgrades to the Hunter Park to create a world-class sport and entertainment complex. – Make Broadmeadow as a destination of choice for entertainment, housing, recreation and discovery. – Achieve optimum densities of the regional plan and promote employment and tourism activities near high-frequency public transport, open space and walking and cycling connections."

Clearly having regard to the scale and intensity of use of the HISC (18,000 attendees per week/ 2,600 persons per day) with the peak usage being in the evenings and on weekends the facility should be incorporated within Hunter Park and not within what is a predominantly low density residential neighbourhood. This seems obvious to everyone except planners!!

The principal reason it is not being located within Hunter Park appears to be one of expediency and convenience, as opposed to good long term planning. The existing basketball site is State owned land earmarked for housing and the State Government requires a quick and convenient fix to relocate BANL to an alternative site. A previous site within the Lake Macquarie LGA (Hillsborough Road) was refused by the Regional Planning Panel.

Alternative site within the Broadmeadow precinct which should be thoroughly investigated include;

- Relocate Magic Park Football Club and use this and the adjacent site bordered by Denny Street/Curley Road and Styx Creek.
- Relocate the Knights CofE playing fields which front Perth Road to Wallarah and Blackley Ovals and build the HISC on those sporting fields fronting Perth Road.

Loss of publicly accessible open space and sportsgrounds

- b. Wallarah & Blackley Oval form part of an extensive spine of open space which extends from Turton Road at the eastern end and follows the open concrete lined Lambton Ker-Rai Creek to the western end of Womboin Road in proximity to the intersection with Hobart Road and encompasses a number of open grassed sportsgrounds/playing field including Arthur Edden Oval, Ford Oval, New Lambton Skate Park, Harker Oval and Kentish Oval. A shared pedestrian/cycle path extends along the southern boundary of this open space adjacent to the Creek. Also in the immediate locality to the north-west, and separated by a small pocket of residential development is Lambton Park which incorporates Lambton Memorial Pool, Club Lambton (bowling club) Harry Edwards Oval, Lambton Oval, Lambton Park Tennis Courts and Lambton Park Playground.

This extensive spine of open space comprises predominantly open and accessible sports fields with only a small number of the aforementioned facilities fenced and inaccessible. This open space is highly valued by the local community for a range of recreational activities as well as

representing a defining characteristic of the Lambton/New Lambton suburbs. Very few suburbs in Newcastle can boast such an extensive network of freely accessible open space.

- c. CN's Strategic Sports Plan December 2020 makes no reference to an excess of open space within the LGA. Report states the existing quantity of open space is sufficient for future growth – Wallarah Oval deemed underutilised – need to explore this more
- d. The loss of the existing open space provides no net benefits to local residents (except those that play basketball which is likely to be a small minority) but will endure all the negatives:
 - Increased traffic and parking particularly in the evening during peak use times and weekends,
 - Increased noise associated with vehicular and pedestrian traffic,
 - Headlight glare (to residences along the southern side of Monash Road which is 90° angle parking rear to kerb)
 - A massive industrial scale building which, despite the use of architectural cladding, is of a significantly larger bulk and scale than any other building forms to the west of Turton Road.

Cumulative Traffic and Parking Impacts within Local Residential Streets

Local residents currently tolerate the use of local residential streets for on-street parking by patrons of sporting and other activities held at McDonald Jones Stadium and Newcastle International Hockey Centre including Newcastle Knights, Newcastle Jets, music concerts and other events. During the main winter sports season (April to September) the frequency of this on-street parking is high with the residential precinct of Lambton/New Lambton to the west of Turton Road effectively parked out during major events in excess of around 8,000 patrons.

Whilst there is general acceptance by residents of this on-street parking by sporting/concert patrons as residents can enjoy the amenity of the open accessible sportsgrounds when they are not being used for organised sport there comes a point when enough is enough. That trigger point is now with this current proposed development. Pursuit of public transport options for this development and the Hunter Park Precinct might be well intentioned but requires a more comprehensive traffic and parking strategy which should include a multi level parking station within the Broadmeadow Precinct.

The Traffic Impact Assessment (TIA) and Traffic Event Management Plan (TEMP) reference the use of overflow parking (within Monash Road - 140 parking spaces approx. and McDonald Jones Stadium – 900 parking spaces approx.) for the proposed larger events (16 events of approximately 1700 persons held between April and August (that's 1 event every weekend) + 2 x larger events of 2,500 persons) held on weekends.

Staging (P115) of the Broadmeadow Place Strategy indicates that Stage 1 (short term) – 0-10 years will include, among other components, the *“relocation of the entertainment centre and basketball facility to allow mixed-use developments to catalyse the future town centre at Broadmeadow Station (including a new community facility), and locate new residential uses within the town centre and adjoining Broadmeadow Park sub-precinct”*.

Stage 2 – medium term, 10-20 years includes a new aquatic and leisure centre to be constructed on the southern part of the existing harness racing track.

Clearly the McDonald Jones 'overflow' parking will be unavailable for use by the HISC in the short to longer term and cannot be relied upon to cater for overflow parking. The unavailability of this overflow parking will result in significantly more traffic and parking congestion in local residential streets.

The lack of overflow parking begs the larger question beyond the scope of this application as to where patrons of these proposed new sporting and/or entertainment facilities are going to park as there is no reference to any form of new multi-level parking facility within Hunter Park or the Broadmeadow Precinct generally.

Other shortcomings/issues;

- The TIA references 240 parking spaces but this includes 9 drop-off/pick-up which can't be used for persons attending an event.
- The TIA only allows for 2 larger buses (coaches 14.5m) and suggests that this will be sufficient during such events as school carnivals. Where is the evidence to suggest this will be the case and only smaller coaster buses will be used.
- The TIA & TEMP state the site is well located to Broadmeadow Station (1km). This is a long way for sporting fans (which would include small children, parents and grandparents) to walk particularly in extreme weather (hot, cold or wet) and carrying the usual array of accompanying gear. Furthermore the % of persons using public transport is minimal and no more than 2-3% as outlined in other traffic reports supporting the rezoning for the Broadmeadow Place Strategy.
- The TIA states *"Discussions have been undertaken between Newcastle Basketball Association, Basketball NSW and Venues NSW. The schedule for events at the HISC will be determined following review of the schedule for McDonald Jones Stadium to ensure they do not coincide with main events at McDonald Jones Stadium."* The Operational Mgmt Plan prepared by the APP Group states at section 2.7.1 that Venue NSW has indicated there will be between 60-70 days a year the carpark will not be available for shared parking due to planned concert and sporting events.

Given the significant outlay/grant of public funds being sought by BANL (around \$90m at today's cost for the complete development) it is considered essential that this schedule of events (not just MJ Stadium but also other major events including Hockey and Newcastle Jets) be clearly defined during the DA assessment process and not left as some form of deferred commencement condition particularly as the peak usage of the HISC for events exceeding 500-800 persons (Waratah League, NBL1 and full house events) on weekends will clash with other mass attendance events at other venues.

Resolution of this matter prior to determination of the DA is essential to ensure ratepayers money is being well spent and the operational capacity of the HISC is not constrained from day 1 given an anticipated lifespan of some 30-50 years.

- During larger events the vehicle entry/exit driveway of Turton Road, which is designed to favour vehicular traffic, will constitute a pedestrian/traffic conflict point for patrons using

overflow parking at MJ Stadium and crossing at lights at Turton/Young Road and walking to site south along Turton Road. The substantial width of the roadway across the road reserve will also present a traffic safety issue for regular pedestrians and school children using the public footway.

- Overflow parking on northern side of Monash Road will become the principal parking area for regular attendees (players, staff etc) to avoid potential traffic congestion on Turton road and need for left-in/left-out and proximity to the facility via the pedestrian bridge. The architectural plans readily show the pedestrian link from the Monash Road pedestrian bridge to the main entry of the HISC. However, the northern side of Monash Road is unformed and non-compliant with Australian Standard. Notwithstanding this section of road has been used for many years as overflow parking the use of this 'overflow' parking presents traffic and safety hazards (slopes to unfenced stormwater channel at the rear, no footpaths on either side of Monash Road with patrons (elderly, children) required to walk along the road shoulder.

The concept of 'overflow' parking assumes infrequent use but in the case of the HISC this parking will become, as previously stated, the principal parking area for many regular patrons of the HISC including players, coaches, staff and visitors.

Height, bulk and scale and intensity of use of proposed facility in inappropriate in the context of surrounding low density residential development

- a. Height of proposal (between 10 and 15m) is considerably higher than the 8.5m height limit of adjoining R2 Low Density zoned land.
- b. Bulk and scale of building(s) is significantly greater than that of adjacent and neighbouring buildings (dwellings and school) within the immediate locality on the western side of Turton Road. Monolithic massing and scale of the building(s) is more akin to industrial buildings in the industrial estates of Beresfield or Thornton.
- c. External materials and cladding requires clarification. The architectural plans reference horizontal standing seam cladding or similar however the elevational drawings depict some form of banding to the external facades of the southern and western elevations to break up the mass of unrelieved cladding.

Deficiencies of the Visual Impact Assessment (VIA)

- VIA is heavily biased towards characterising the site as part of the Broadmeadow Regionally Significant Growth Area or more specifically the sub-precinct of Hunter Park which it is not. Turton Road forms the western boundary of the Broadmeadow precinct for good planning reasons. Section 3.1 Local Context of the report devotes the majority of the chapter to describing the future character of the Broadmeadow Precinct rather than the low density nature of surrounding land to the west.

Section 3.2 states surrounding land is largely recreation despite the fact that Image 6 Land Zoning diagram clearly shows surrounding land use is low density residential.

While the site and proposed development, from a motorists viewpoint travelling north/south along Turton Road, would be incorporated within their view corridor the site will be most prominently viewed by persons (typically pedestrians/cyclists/students/teachers etc) from the adjacent cycleway and Monash Road and surrounding streets to the west.

The key Landscape Character Units which are considered most relevant to assessment of the visual impact are the Recreational Space and Low Density Residential.

A number of the viewpoints (3, 4 & 5) from the southern (Monash Road and shared pedestrian/cycleway) have been carefully selected as they include building elements to minimise existing views of the sporting ovals. More representative locations would be the junction of the shared pedestrian pathways at the SW corner of Wallarah Oval (where the water bubbler is located).

Image 59 (Viewpoint 4 from Authur Edden Oval). The proposed tree vegetation will take some 20 years to grow to the height shown. What the image fails to show is the more accurate scale and massing of the proposed building form for the initial 20 years but the visual impact has been assessed in section 10 as low (due the screening vegetation).

Similarly, the visual impact has been assessed as Moderate to Low for Viewpoints 3 & 5 due to proposed additional screen landscaping which like Image 59 won't be realised for 20 years or so.

If such extensive screen planting is required to reduce the visual impact rating, which is contrary to the open spaciousness which residents currently now enjoy, then perhaps the proposed development is inappropriate for this location.

Estimated Cost of Development

APLAS Quantity Surveyors estimate that the development cost of this facility (all stages) is approximately \$90M (inc. GST) with the costing including escalation to the end of 2025. It is understood that BANL have received an initial State Government grant of \$25m with no further funding commitment. That's a bloody lot of Bunning sausage sizzles to make up the shortfall!

Interesting the original proposal for Hillsborough Road (2019) had an estimated cost of around \$19m. Accordingly the costing figures seem very questionable.

Yours Sincerely



Simon Pocock