Submission Opposing the Hunter Indoor Sports Centre (HISC)

FLOOD IMPACT RISK ASSESSMENT – Appendix I

1. Non-Compliant Flood Level Increases

The FIRA modelling identifies measurable increases in flood levels upstream and downstream of the site, including:

- Average increases of **0.02–0.04m** across the floodplain.
- Localised increases of **up to 0.08m (8cm)**.

Although the report attempts to present these figures as "minor," NSW floodplain risk management practice recognises that **any increase in flood levels on third-party land is unacceptable**. Even small vertical increases can:

- Convert non-hazard flooding (yards, garages) into **over-floor flooding** of homes.
- Increase the **frequency of above-floor inundation events**, shifting properties into higher flood-risk categories.

This outcome is inconsistent with the **NSW Floodplain Development Manual (2005)**, which requires development to demonstrate no adverse impact on surrounding properties.

2. Reduction in Available Flood Storage

The assessment confirms that the proposal, including its building platform and car park works, will displace flood storage capacity within the floodplain. The consequence is a redistribution of floodwaters into adjoining residential areas. This results in:

- **Loss of natural flood buffering**, directly increasing flood depths and velocities off-site.
- Higher exposure of neighbouring homes and yards to damage and erosion.
- Contravention of the **"no worsening" principle** embedded in NSW planning practice.

3. Elevated Risk to People and Property

The increase in depth and velocity across the local floodplain translates into heightened risks, including:

- **Structural damage**: fencing, landscaping, and foundations undermined by faster moving floodwater.
- **Public safety hazards**: flood velocities sufficient to destabilise pedestrians, particularly children and elderly residents.
- **Health impacts**: prolonged standing water leading to mould, contamination, and increased vector breeding near residential homes.

This outcome is inconsistent with **Clause 4.15 of the Environmental Planning and Assessment Act 1979**, which obligates consent authorities to consider likely impacts on the built environment and human safety.

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4. Accessibility and Emergency Response Failures

The FIRA does not adequately address the effect of increased flooding on **road access and evacuation routes**. Even minor increases in flood depth can:

- Render key residential roads **impassable to vehicles**, cutting off communities at times of greatest need.
- Prevent emergency services from safely reaching residents, undermining disaster response.
- Conflict with the **NSW State Emergency Service flood evacuation policy**, which requires developments not to worsen local evacuation risk.

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5. Long-Term Community and Financial Burden

Beyond the immediate physical risks, the modelling outcomes impose **significant long-term consequences** on the community, including:

- **Insurance implications**: properties subject to new or deeper inundation will face higher premiums or loss of coverage.
- **Property devaluation**: homes reclassified as higher flood risk will experience reduced market demand.
- **Ongoing financial and psychological costs** for families repeatedly impacted by flood clean-ups.

The proponent has not addressed these downstream social and economic impacts, despite their material relevance under the SSD assessment framework.

6. Flood Storage and Greenspace

The subject land currently functions as a **large open greenspace within the floodplain**, playing a critical role in moderating flood impacts during **East Coast Low events and other high-rainfall systems**. Its natural permeability and storage capacity provide two key protective functions for surrounding residents:

1. **Absorption and infiltration** – the grassed, undeveloped land allows substantial rainfall infiltration, reducing immediate surface runoff into residential areas.
2. **Temporary flood storage** – during extreme rainfall and riverine flooding, the open space operates as a natural retention basin, **holding water on-site** and reducing flood levels on neighbouring properties.

The proposed development will replace this natural flood-mitigating function with hardstand, buildings, and car parking areas. The result is:

- **Loss of infiltration** capacity, forcing larger volumes of runoff into the drainage system at faster rates.
- **Reduction in natural flood storage**, displacing floodwaters towards residential properties that currently benefit from this protective buffer.
- **Cumulative intensification of flooding impacts** during East Coast Lows, where long-duration, high-intensity rainfall already stresses regional flood management infrastructure.

This represents a direct **erosion of community resilience** and contradicts the NSW Floodplain Development Manual (2005), which emphasises the preservation of natural floodplain storage and conveyance functions.

Conclusion

The proponent's own Appendix I confirms that this development will:

- Increase flood levels on surrounding land by up to **8cm**;
- Displace flood storage, worsening conditions for neighbouring residents;
- Reduce evacuation safety and emergency access; and
- Impose long-term financial and social costs on the community.

These outcomes are **contrary to the NSW Floodplain Development Manual (2005)**, the **Environmental Planning and Assessment Act 1979**, and the **core principle of no adverse off-site flood impact**.

For a State Significant Development, such risks are fundamentally unacceptable and cannot be mitigated by consent conditions. Accordingly, I strongly urge the Department to **refuse consent to the Hunter Indoor Sports Centre SSD in its current form**.

GROUNDWATER ANALYSIS – Appendix R

1. OPEN GREENSPACE – NATURAL BUFFER

The site in question is not vacant or degraded land. It is presently a **large, open greenspace that supports existing outdoor sporting use and functions as a natural flood buffer**. During East Coast Low events, this land provides significant temporary water retention capacity, reducing the risk of floodwater displacement into nearby homes and infrastructure. Development of this sensitive parcel into a hard-surfaced, heavily built facility threatens to remove this natural safeguard and to create unacceptable hydrological, environmental, and community impacts.

2. Flooding and Surface Water Risks

2.1 Inadequate Flood Storage Compensation

The *Flooding Assessment (Appendix L)* acknowledges that groundwater levels sit within 1–3m of the surface and that the site is prone to inundation. However, the modelling and staging plan fail to quantify **compensatory flood storage capacity** once the open greenfield is converted to a fully built stadium with impervious surfaces and reduced infiltration.

The removal of the natural absorptive function of the land will:

- Increase floodwater velocity and displacement toward residential streets and homes;
- Reduce lag time in peak flows during East Coast Lows, amplifying downstream impacts; and
- Compromise adjoining drainage systems already under stress during storm events.

2.2 Staging and Operational Concerns

The *Operational and Construction Staging Plan (Appendix JJ)* is unrealistic and financially under-resourced. With only **$25 million secured** against an estimated cost exceeding **$90 million**, there is no demonstrated capacity to deliver the required integrated flood mitigation measures. Partial staging without full mitigation infrastructure risks leaving the site in a compromised state, vulnerable to uncontrolled water flows during interim phases.

3. Groundwater and Aquifer Interference

3.1 Absence of Robust Quantification

The *Groundwater Statement (Appendix R)* relies on speculative estimates of groundwater take rather than hydrogeological modelling. It acknowledges groundwater at 1–3m below ground level and piling to 8m, yet fails to quantify cumulative groundwater drawdown or to assess seasonal fluctuations. This omission prevents proper risk assessment and contravenes the requirements of the **NSW Aquifer Interference Policy (2012)**.

3.2 Improper Reliance on Regulatory Exemptions

Rather than applying for a Water Access Licence (WAL), the proponent seeks to rely on the **<3ML/year exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018**. This is inappropriate for a State Significant Development because:

- No monitoring regime is proposed to verify compliance with the 3ML threshold;
- Seasonal and cumulative inflows could easily exceed estimates, especially during construction in wet periods; and
- The exemption mechanism was never intended to cover major developments of this scale.

3.3 Ignored Post-Construction Risks

The Statement asserts "zero water take after completion." This is technically flawed: subsurface piles and underground services create **permanent preferential flow paths**, altering aquifer pressures and potentially contributing to long-term subsidence, waterlogging, or seepage into adjacent residential areas. No conceptual model is provided to evaluate these legacy risks.

4. Loss of Greenspace and Cumulative Impacts

The proposed development will permanently remove a **multi-use sporting field and public open space**, which also serves as a natural hydrological buffer. This greenspace:

- Provides water absorption and retention capacity during heavy rainfall;
- Functions as a floodwater dispersion zone that reduces risk to surrounding homes;
- Supports biodiversity and soil stability through shallow groundwater interactions. Eliminating this function and replacing it with an impermeable stadium precinct amounts to a **net increase in regional flood and groundwater risk**, compounded by the project's admitted lack of funding for complete mitigation.

5. Conclusion and Determination Request

Taken together, the deficiencies in Appendix L (Flooding), Appendix R (Groundwater), and Appendix JJ (Staging Plan) show that the proposal:

- Fails to quantify or mitigate **flood storage loss** and **groundwater interference**;
- Relies improperly on **regulatory exemptions** rather than robust licensing and monitoring;
- Ignores post-construction groundwater and floodplain legacy impacts;
- Undervalues the current role of the land as a **greenspace and hydrological buffer**; and
- Proceeds without the necessary **financial resourcing** to ensure full and safe delivery.

TRAFFIC & ACCESSIBILITY IMPACT ASSESSMENT – Appendix L

The evidence contained within this technical report demonstrates that the proposal will have **unacceptable impacts on traffic efficiency, parking adequacy, pedestrian/cyclist safety, and residential amenity**, which directly conflict with NSW planning policy objectives and the principles of sustainable development.

1. Unacceptable Traffic Generation & Network Impacts

The assessment acknowledges that the proposed development will generate a **significant increase in traffic volumes** across the surrounding road network, including local residential streets. While the report attempts to conclude that the network can "absorb" this demand, its own modelling shows:

- **Queueing and delays** at key intersections during peak hours and event periods, which will worsen congestion on adjoining local roads.
- **Diversion of traffic into unsuitable residential streets**, contrary to best practice traffic management principles.
- Increased risks of **gridlock during concurrent regional events or emergencies**, undermining evacuation capacity and the safe movement of emergency vehicles.

This outcome is inconsistent with **State Environmental Planning Policy (Transport and Infrastructure)** objectives, which require developments of this scale to demonstrate net improvements to accessibility and road safety, not deterioration.

2. Inadequate Parking Provision & Overflow Impacts

Appendix L confirms that **on-site parking will not be sufficient to meet demand during peak events**. The overflow will be absorbed by surrounding residential streets, which is unacceptable for a State Significant project. The likely consequences include:

- Widespread **illegal and obstructive parking** across nearby streets, restricting resident access and reducing road safety as ALREADY evidenced with the current Marathon Stadium (Home to Newcastle Knights, Newcastle Jets) and the International Hockey Centre)
- Increased pedestrian hazards due to cars parked on verges and across footpaths.
- Permanent loss of residential amenity as quiet streets are turned into de facto event parking zones.
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This directly contravenes **Austroads Guide to Traffic Management** principles, which require adequate off-street parking supply for major developments, particularly where public transport access is limited.

3. Road Safety Risks to Pedestrians & Cyclists

The report concedes that the proposal will increase **turning movements and traffic volumes** at the site's access points, elevating conflict risk for pedestrians and cyclists. The risks are amplified during night-time events when visibility is poor. The affected groups include:

- **School children and families** who regularly walk or cycle in the area.
- **Elderly residents** with limited mobility who will be disproportionately impacted by higher traffic and reduced safety margins.
- **Event attendees themselves**, who will face unsafe conditions due to inadequate separation of vehicle and pedestrian flows.

This outcome breaches the objectives of the **NSW Road Safety Action Plan 2026**, which emphasises protecting vulnerable road users, especially around major activity centres.

4. Accessibility & Network Resilience Failures

Appendix L does not adequately address how residents will **maintain reliable access** to their homes and community services during high-volume events. Key deficiencies include:

- No evidence that the network can sustain both regular daily flows and event surges without **blocking residents in/out of their homes**.
- No clear strategy for **traffic management during emergencies**, raising serious concerns about evacuation safety.
- Failure to demonstrate compliance with **Clause 4.15 of the Environmental Planning and Assessment Act 1979**, which requires consideration of impacts on the amenity and accessibility of surrounding properties.

5. Long-Term Cumulative Impacts

The report narrowly focuses on isolated operational conditions, without robust assessment of cumulative effects over the long term. The reality is that:

- Residents will suffer **permanent deterioration of amenity** due to congestion, noise, and parking stress.
- Property values are likely to decline as liveability is compromised by constant traffic impacts.
- The community, not the developer, will bear the ongoing cost of traffic and accessibility failures.

Conclusion

Appendix L makes clear that this proposal will **worsen local traffic conditions, undermine safety, and erode residential amenity**. For a State Significant Development, these impacts are unacceptable. The evidence demonstrates non-compliance with State planning policies, road safety objectives, and statutory obligations under the Environmental Planning and Assessment Act.

Accordingly, I strongly urge the Department to **refuse consent for the Hunter Indoor Sports Centre in its current form**. The traffic, parking, and accessibility risks are fundamental and cannot be “managed” through conditions of consent.

TRAFFIC MANAGEMENT PLAN - APPENDIX O

1. Introduction

This objection addresses the *Traffic Management Plans (TMP01 and TMP02)* prepared in support of the Hunter Indoor Sports Stadium SSD. While the documents outline generic strategies for medium and high-impact events, they fail to satisfy the requirements of a State Significant Development (SSD) by underestimating risks, overstating mitigation capacity, and neglecting cumulative impacts with surrounding infrastructure.

2. Insufficient Parking Provision and Overflow Impacts

The TMP assumes that the site's **240 on-site parking spaces** will accommodate medium-impact events, with overflow demand directed to **on-street parking**. This approach is inadequate for an SSD because:

- It ignores the existing strain on local streets during concurrent events at McDonald Jones Stadium, the Hockey Complex, or the Entertainment Centre.
- No assessment is provided on the safety or amenity impacts of large-scale overflow parking in residential streets, including increased congestion, blocked driveways, or risks to pedestrian safety.
- Reliance on "sufficient on-street parking" is unsubstantiated and shifts the traffic burden to surrounding communities.

SSD projects require **comprehensive parking and transport solutions**, not assumptions that local streets will absorb unmet demand.

3. Understatement of Pedestrian and Traffic Conflicts

The TMP claims that **pedestrian traffic is minimal** and does not warrant significant additional controls. This is misleading for several reasons:

- High-impact events project attendance of **up to 25,000+ patrons**, creating significant pedestrian flows to and from Turton Road, Monash Road, and Young Road.
- Pedestrian spillover during simultaneous events in the precinct will compound risks, particularly given the limited footpath width and the absence of controlled pedestrian crossings in some areas.
- The TMP provides no modelling of pedestrian movement patterns, despite SSD requirements for demonstrating safe and efficient multi-modal access.

4. Lack of Integration with Surrounding Precinct Events

The Traffic Plans acknowledge the **risk of clashing with Knights games or concerts at McDonald Jones Stadium** but fail to provide a binding coordination framework. Instead, the TMP relies on ad hoc "consultation" with Stadium management, without enforceable protocols. For an SSD in a congested precinct:

- Joint-event scenario planning must be modelled, including cumulative traffic, parking, and public transport demands.
- Traffic Impact Assessments must demonstrate that concurrent events will not gridlock Turton Road and Griffiths Road, which are already pinch points during stadium operations.

5. Failure to Provide Public and Active Transport Solutions

The TMP explicitly states that **no shuttle bus services or Park & Ride options will be provided** for medium-impact events, and only a limited Park & Ride framework is suggested for high-impact events. This contradicts SSD requirements for:

- Promoting public transport as a primary access mode,
- Minimising private vehicle reliance, and

- Demonstrating integration with the regional transport network.

The omission of dedicated shuttle or Park & Ride services effectively ensures heavy reliance on private cars, worsening congestion and emissions.

6. Absence of Variable Message Signs (VMS) and Public Notification

The TMP indicates that **VMS boards and public notifications are not required** for medium-impact events. This underestimates the impact of redirected traffic, overflow parking, and changed traffic conditions on local residents. SSD standards require transparent public communication and advance notice of disruptions. By excluding these measures, the plan fails to provide adequate community protections.

7. Risk Management Deficiencies

Although a risk register is included, many identified risks such as "traffic jams in surrounding areas" and "illegal parking" are downgraded to low or moderate without robust mitigation strategies. For example:

- Traffic congestion is treated as a moderate risk, with vague reliance on "integrated ticketing" and "various egress strategies", none of which are substantiated.
- Pedestrian overcrowding is minimised despite acknowledged risks of injury and traffic conflict.

SSD obligations require **quantified, evidence-based risk mitigation**, not generic statements.

8. Conclusion

The *Traffic Management Plans (Appendix O)* fail to meet the requirements of a State Significant Development by:

- Over-relying on insufficient on-site parking and unproven street parking capacity,
- Ignoring cumulative traffic and pedestrian conflicts with other major venues,
- Providing no binding coordination framework for joint events,
- Excluding meaningful public or active transport solutions,
- Neglecting VMS and community notification obligations, and
- Minimising identified risks without substantive mitigation.

OPERATIONAL AND CONSTRUCTION STAGING PLAN (Appendix JJ)

Operational and Construction Staging Plan (Appendix JJ), together with the project's current funding position, demonstrates that the development is **not financially viable, not deliverable in full, and will impose unacceptable staging and operational risks** on the local community.

1. Funding Deficiency & Undeliverable Staging

The proponent has secured only **$25 million** towards the Hunter Indoor Sports Centre, while the development's total cost is identified at **approximately $90 million (according to 2024/25 prices)**. This leaves a funding gap of over **$65 million**, which is not accounted for in the application.

Given this deficiency:

- There is **no credible assurance** that Stage 2 of the project can or will be delivered.
- The community risks being left with a **half-finished facility** after Stage 1, without the full range of services and benefits used to justify the SSD designation.
- The Department would effectively be granting approval for a development that is **financially unachievable**, contrary to the principles of proper and orderly planning.

This directly undermines the SSD assessment framework, which requires proponents to demonstrate that a project is both **funded and deliverable**.

2. Prolonged Construction Disruption

Appendix JJ outlines up to **24 months of construction** across two stages, with Stage 1 operating while Stage 2 is built. The staging plan itself highlights risks of:

- **Prolonged noise, dust, and traffic disruption** for surrounding residents, students at Lambton High School directly adjacent to the proposed Development and recreational users.
- Increased safety hazards as **Stage 1 remains operational** while heavy construction vehicles and machinery operate in close proximity.
- Overlap between construction and operation creating **conflicting land uses on a constrained floodplain site**, which is incompatible with community expectations of safety and amenity.
- Given the funding shortfall, these disruptions may extend indefinitely if Stage 2 is delayed or abandoned.

3. Risk of Stranded, Incomplete Development

Approval of an underfunded, staged SSD creates a high likelihood of a **stranded asset**, where:

- Stage 1 is delivered, but Stage 2 is never commenced or completed.
- Residents bear the **long-term impacts of partial development** — ongoing traffic, flooding, and amenity impacts — without the benefits of a completed regional facility.
- Public perception of government accountability is undermined, as approval would have been granted to a project that was never realistically achievable in financial terms.

This outcome is inconsistent with **Clause 4.15 of the Environmental Planning and Assessment Act 1979**, which requires decision-makers to consider the "suitability of the site" and "public interest." A financially undeliverable, half-finished development cannot meet these criteria.

4. Loss of Community Confidence

The SSD process demands that projects of State Significance demonstrate clear public benefit. In this case:

- The proponent has not demonstrated how the **$65 million shortfall (and climbing annually)** will be resolved.
- The project, as staged, risks **delivering disruption without delivery of promised benefits**.
- Approval under these circumstances would erode public confidence in the SSD framework, appearing to favour speculative proposals over properly costed, achievable developments.

Conclusion

Appendix JJ confirms that the Hunter Indoor Sports Centre SSD relies on a **two-stage construction program** over at least 24 months. However, with only **$25 million secured out of the required $90 million (and climbing)**, the project is **financially undeliverable** in full. The likely outcome is an incomplete facility, prolonged disruption, and long-term negative impacts for surrounding residents.

For a State Significant Development, this is unacceptable. On these grounds, I strongly urge the Department of Planning and Environment to **refuse consent to the Hunter Indoor Sports Centre SSD** in its current form.

VISUAL IMPACT STATEMENT – APPENDIX H

1. The assessment, while detailed in presentation, contains fundamental shortcomings that result in an underestimation of the true visual and amenity impacts. The site is currently an **open community greenspace** that provides visual relief, recreation, and ecological value within a precinct already dominated by large sporting infrastructure. Converting this land into a large-scale built facility will irreversibly alter the landscape character, to the detriment of local residents and the community.

2. Mischaracterisation of Scenic Value

The VIA assigns a **"low scenic quality rating"** to the site and its surrounds, citing the presence of existing development. This is misleading:

- The site is one of the few remaining **open, flat green areas** in a precinct dominated by hardstand, carparks, and large structures such as McDonald Jones Stadium.
- The space contributes to local amenity by providing a **visual break** between dense sporting infrastructure and residential streets.
- Its current character as a natural, open sporting field enhances urban biodiversity and community wellbeing, which the VIA downplays.

By undervaluing the site's existing visual and social function, the assessment biases the outcome towards acceptability of change.

3. Understatement of Local Residential Impacts

The VIA acknowledges the **greatest visual impact will be felt by residents along Monash Road and commuters on Turton Road**. However, it downplays the scale and significance of these impacts by:

- Describing them as "moderate–low," despite the proposal introducing a **bulky massing form** with a 2,500-seat show court and extensive car parking.
- Ignoring the **cumulative impact of lighting** from extended operating hours (7am–10pm), which will introduce ongoing night-time glare into residential properties.
- Overlooking the **loss of outlook** for Monash Road residents, who will see their current open green view replaced by a large, brightly lit complex.

4. Over-Reliance on Landscaping as Mitigation

The assessment assumes that **perimeter tree planting and buffers** will adequately mitigate visual impacts. This is unrealistic because:

- Screening vegetation will take many years to mature and will not provide meaningful short- to medium-term relief.
- Mature trees cannot fully obscure the **visual bulk and height** of the proposed stadium, particularly Stage 2's show court extension.
- Landscaping does not address **lighting overspill**, which remains a significant visual intrusion for adjacent residents and road users.

The VIA's reliance on landscaping as the primary mitigation measure is therefore inadequate.

5. Failure to Address Cumulative Precinct Context

The proposed stadium is not occurring in isolation. The surrounding area already contains multiple **large, visually dominant sporting facilities** including McDonald Jones Stadium, the Entertainment Centre, and the Hockey Complex. Adding another large-scale, brightly lit structure further compounds the **loss of open visual relief** in the precinct. The VIA treats the project in isolation rather than assessing its contribution to **cumulative visual overload** in the Hunter Sports and Entertainment Precinct.

6. Conclusion

The *Visual Impact Assessment* significantly understates the scale, intensity, and cumulative nature of the proposed development's impact. Specifically, it:

- Mischaracterises the site's existing **greenspace and scenic value**,
- Understates the **residential and commuter impacts**,
- Relies excessively on **long-term landscaping mitigation**, and
- Fails to address the **cumulative visual saturation** of the precinct.

Given these deficiencies, the Visual Impact component of the SSD application is **inadequate and misleading**. The application should not be approved unless and until:

1. An independent peer review is undertaken to reassess **true residential and commuter visual impacts**;
2. A **night-time lighting and glare assessment** is provided that quantifies impacts on adjacent homes;
3. Cumulative effects are addressed, considering existing large sporting infrastructure in the precinct; and
4. Realistic, enforceable mitigation measures are developed that go beyond landscaping.

SOCIO-ECONOMIC IMPACT STATEMENT – Appendix DD

1. Introduction

The *Socio-Economic Impact Assessment (SEIA)* prepared for this SSD is presented as evidence of broad community benefit. However, closer review reveals **substantial methodological flaws, selective emphasis, and inadequate mitigation of negative impacts**. Far from supporting approval, the SEIA confirms significant community opposition and material socio-economic risks.

2. Overwhelming Community Opposition Ignored

The SEIA acknowledges that during public exhibition:

- **495 submissions objected**, compared to only **173 in support**.
- The most prominent objections related to: **loss of greenspace (443 submissions)**, **traffic (336)**, and **limited parking (254)**.

Despite this, the report downplays these objections and reframes them as outweighed by claimed regional benefits. This is inconsistent with SSD social impact assessment requirements, which demand genuine weight to local lived experience, not broad generalised assumptions.

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3. Misrepresentation of Greenspace and Community Value

The SEIA admits the loss of Wallarah and Blakeley Ovals will reduce community open space. However, it minimises this by asserting alternative sports fields exist elsewhere. This argument is flawed because:

- The site is not just sporting land but a **multi-use community greenspace** supporting unstructured recreation, dog walking, children's play, and Lambton High School emergency evacuation and other sports that are being displaced to Sporting Grounds almost 20km away.
- No equivalent replacement greenspace in close proximity is identified. Relocation of formal sporting codes does not mitigate the broader **loss of public open space character**.
- The SEIA fails to assess the loss of the land's **critical role in flood absorption** during East Coast Lows, which is both a social and economic protection for neighbouring homes.

4. Flawed Economic Benefit Claims

The SEIA forecasts job creation, increased productivity, and health benefits. These claims are **unsubstantiated** because:

- Job creation figures are based on **input-output modelling**, which overstates benefits by recycling multiplier effects without accounting for displacement (jobs and spending shifted from other venues).
- Health and productivity benefits are based on **assumed participation growth**, yet the report itself notes Newcastle already has above-average basketball participation. It fails to demonstrate unmet demand justifies a facility of this scale.
- The reliance on "ActiveXchange" modelling for participation projections ignores the risk that **cost, travel, and accessibility barriers** will exclude many vulnerable community groups.

5. Inadequate Consideration of Negative Social Impacts

The SEIA is required by the Social Impact Assessment Guidelines (DPIE 2023) to analyse how affected communities will experience impacts. It fails by:

- Minimising impacts on **Lambton High School students**, who lose daily access to safe, open green space for recreation, sport, and emergency evacuation.
- Downplaying **residential amenity impacts**, including noise, lighting, parking congestion, and loss of visual relief, despite widespread submissions raising these concerns.
- Treating social disruption as temporary, when the reality is a **permanent loss of local amenity and character**.

6. Engagement Process Tokenistic

While the SEIA claims "extensive consultation" was undertaken, the actual evidence reveals tokenistic methods:

- Only **240 surrounding households** received letterbox notifications—grossly inadequate given the scale of the SSD.
- Attendance at drop-in sessions was minimal, reflecting poor reach and accessibility.
- The report acknowledges strong feedback of "right project, wrong location," but then disregards this sentiment in its conclusions.

SSD requirements demand meaningful engagement and adaptive project design based on concerns. Instead, objections have been acknowledged but not addressed.

7. Cumulative Impacts Ignored

The SEIA treats the stadium in isolation. It does not adequately assess cumulative effects with:

- McDonald Jones Stadium,
- the Newcastle Entertainment Centre,
- the Hockey Complex, and
- Hunter Park redevelopment.

These overlapping facilities already create congestion, parking conflict, and saturation of built form. The SEIA's failure to address this precinct-wide cumulative impact renders its conclusions incomplete.

8. Failure to Demonstrate Strategic Necessity at This Site

While the SEIA argues the stadium is needed to address regional shortfall, it omits critical facts:

- A **previous Hillsborough stadium proposal was rejected** by the Hunter & Central Coast Regional Planning Panel in 2022 due to planning conflicts.
- Alternative sites, including Glendale, were identified but dismissed without full community assessment.
- The "justification" relies on political announcements, not a transparent multi-site comparison.

Thus, the argument of "no alternative but Wallarah Oval" is unsupported.

9. Conclusion

The *Socio-Economic Impact Assessment* does not meet SSD requirements for a robust, balanced, and transparent evaluation. It:

- Ignores overwhelming community opposition,
- Misrepresents the true value of lost greenspace,
- Relies on inflated and speculative economic benefits,
- Downplays serious negative social impacts,
- Engages tokenistically with affected residents,
- Omits cumulative precinct-wide assessment, and
- Fails to justify why this sensitive greenspace site is appropriate.

FINAL CONCLUSION

After careful review of the applicant's own supporting documents—including the Flooding and Surface Water Assessment, Groundwater Statement, Visual Impact Assessment, Traffic Management Plans, and Socio-Economic Impact Assessment—it is evident that the proposed Hunter Indoor Sports Stadium is **not suitable for the Wallarah/Blakeley Oval site**.

The combined evidence demonstrates:

1. **Flooding and Greenspace Loss**
    - The site functions as a **critical flood buffer during East Coast Lows**, absorbing and holding water that would otherwise inundate surrounding homes.
    - The development permanently removes this protective capacity, replacing it with impervious built form and car parks.
    - No credible compensatory flood storage has been provided, and staging risks mean the site could be left vulnerable and unsafe.
2. **Groundwater Interference**
    - Excavation and piling will intersect groundwater at 1–3m below ground with no robust modelling of inflows, drawdown, or long-term impacts.
    - The proponent improperly seeks to rely on exemptions rather than secure a Water Access Licence, avoiding proper regulation.
    - Permanent subsurface changes threaten to alter aquifer pathways, risking subsidence, drainage changes, and long-term impacts to neighbouring properties.
3. **Visual and Amenity Impacts**
    - The project removes one of the last open, green recreational spaces in the precinct, replacing it with a bulky, brightly lit stadium.
    - Residents along Monash Road and surrounding areas will permanently lose visual relief, amenity, and property value.
    - Landscaping mitigation is overstated and cannot offset the permanent scale, lighting, and built form impacts.
4. **Traffic and Access Failures**
    - Parking provision is grossly insufficient, with reliance on already congested residential streets.
    - No binding framework exists to manage traffic when events coincide with McDonald Jones Stadium, the Entertainment Centre, or the Hockey Complex.
    - Public and active transport solutions are absent, entrenching private car dependency and worsening congestion, safety risks, and community disruption.
5. **Socio-Economic and Community Harm**
    - Public exhibition confirmed **overwhelming opposition**: 495 objections compared to just 173 in support.
    - The community's concerns—loss of greenspace, traffic, flooding, parking, and school impacts—are downplayed rather than addressed.
    - Economic claims rely on inflated modelling and ignore displacement effects.
    - Lambton High School students lose access to vital open space for recreation, wellbeing, and emergency evacuation.
    - Engagement has been tokenistic, with objections acknowledged but not resolved.

Taken together, these flaws demonstrate that this proposal **fails to meet the fundamental requirements of a State Significant Development**. It:

- Increases rather than mitigates flood and groundwater risk,
- Destroys valued greenspace that is irreplaceable in this location,
- Compromises residential amenity and safety,

- Cannot demonstrate integrated or sustainable transport outcomes,
- And faces overwhelming community opposition.

The **right project has been placed in the wrong location**. There is a clear regional case for improved indoor sporting facilities, but this does not justify forcing them onto a site whose natural function is to serve as greenspace and flood storage.

For these reasons, it is respectfully submitted that the SSD must be dismissed, and that alternative, less sensitive locations—already identified in previous planning processes, such as Glendale or Hillsborough—be properly reconsidered.