

# Objection to Proposed State Significant Development

I write to lodge a formal objection to the approval of the proposed Hunter Indoor Sporting Complex (HISC) State Significant Development at Broadmeadow. After reviewing the Environmental Impact Statement (EIS), associated technical appendices, and agency submissions, it is evident that the project does not comply with the key statutory and policy requirements that govern State Significant Developments (SSD) in New South Wales.

This objection draws on the SSD Guidelines (2023), Planning Circular PS-24-001 on flood risk (2024), the NSW Flood Risk Management Manual (2023), and the City of Newcastle Development Control Plan 2023 (DCP 2023). Each highlights material deficiencies and inaccuracies in the proposal that demonstrate it should not proceed at this particular location.

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## 1. Flood Risk and Storage Compliance

The HISC site is a known flood-prone area within the Hunter floodplain. The Newcastle DCP 2023 requires that no more than 20% of the site's flood storage capacity be lost ( $\geq 80\%$  retention). The proponent's Flood Impact Risk Assessment concedes that only 64–71% of flood storage would be retained in critical design events. This is a clear and measurable breach of the applicable control.

The Flood Emergency Response Plan (FERP) is also based on assumptions already deemed inaccurate by the NSW State Emergency Service (SES). The SES has stated it does not support shelter-in-place strategies for new developments, yet this is the central strategy proposed for the HISC. This approach is contrary to Planning Circular PS-24-001 (2024), which requires risk-based decision making and avoidance of intensifying use of high-hazard flood zones.

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## 2. Emergency Management Deficiencies

The proposal significantly underestimates real event attendance. While the Traffic Management Plans model "high-impact events" of 1,700–2,500 patrons, the FERP assumes fewer than 1,000 patrons would be present during flood onset. This discrepancy undermines confidence in the viability of the refuge and evacuation strategy.

Further, the proposed car parks sit within H2 and H3 hazard zones, where flood depths and velocities pose unacceptable risks. Newcastle City Council has already recommended removal or relocation of these areas. The proponent has not addressed these issues in line with the SSD Guidelines requirement for realistic, implementable mitigation strategies.

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## 3. Traffic, Transport and Cumulative Impacts

The development is positioned in an already congested precinct. The proponent inconsistently claims the HISC "does not rely" on nearby parking, yet the Traffic Management Plans direct overflow to the Marathon Stadium (already identified as not available with the Broadmeadow Place Strategy), Carparking at Wests Bowling Club that overlaps with patrons of both Western Suburbs Rugby League (Junior & Seniors), Western Bowling Club, Wests Newcastle patrons and vacationers)

<https://mywests.com.au/clubs/wests-new-lambton>

These sites are neither secured nor guaranteed. Venues NSW has confirmed stadium car parks will not be available long-term, especially under the Hunter Park / Broadmeadow Place Precinct redevelopment.

Further, Transport for NSW has requested updated cumulative modelling to reflect broader Broadmeadow/Hunter Park changes. The proponent has deferred this to future planning stages, contrary to SSD Guidelines, which require comprehensive cumulative impact assessment before approval.

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#### 4. Groundwater and Staging/Funding Uncertainty

The Department of Climate Change, Energy, the Environment and Water (DCCEEW) requested clear volumetric assessment of groundwater interception. Piling to 8m depth will likely intercept shallow aquifers, yet the proponent has failed to provide volumetric estimates or show compliance with the Water Management Act 2000 and Aquifer Interference Policy. This is a critical gap for SSD determination.

The project is also proposed in stages, with essential elements such as the show courts deferred to later funding rounds. Current estimates suggest costs exceeding \$80 million, but earlier documents reference only \$30 million in available funding. This raises serious risk that only a partial facility will be delivered, leaving the community with an incomplete, stranded development on critical open space and flood storage land.

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#### Conclusion

The Hunter Indoor Sporting Complex SSD fails to meet the standards set out in the NSW planning framework. Specifically, it:

- Breaches flood storage requirements of the Newcastle DCP 2023 ( $\geq 80\%$  retention).
- Relies on a flood plan rejected by SES, inconsistent with Planning Circular PS-24-001 (2024).
- Contains material inaccuracies in traffic and parking, with reliance on third-party facilities not guaranteed.
- Fails to quantify groundwater impacts, contrary to the Water Management Act 2000 and Aquifer Interference Policy.
- Lacks secured funding for its full scope, risking an incomplete development.

For these reasons, I respectfully request that the Hunter Indoor Sporting Complex SSD be refused in its current location. The proposal is not suitable for its site, does not satisfy the requirements of the SSD Guidelines, and is clearly contrary to the public interest under section 4.15 of the Environmental Planning and Assessment Act 1979.