

FIRE ENGINEERING STATEMENT

Subject:	10 Dangar Street, Wickham, NSW	Project:	150103.00
Date:	1 April 2026	Version:	C

This letter is provided in support of the State Significant Development Application (SSDA), and to advise that Holmes has been engaged by UPG Wickham Pty Ltd to provide fire engineering services for the proposed mixed-use development, to be located at 10 Dangar Street, Wickham, NSW.

Based on Holmes's review of the project documentation, it is considered that performance based fire engineering can be utilised to demonstrate compliance with the Performance Requirements of the BCA without substantial changes to the current design. Additional fire engineering issues may be identified as the design is further developed, however it is considered that there are no significant issues that would substantially affect the building layout.

1 INTRODUCTION

This Fire Engineering Statement is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of UPG Wickham Pty Ltd (UPG) (the Applicant), in support of a State Significant Development Application (SSDA) and concurrent rezoning for the construction of a 43-storey mixed-use development at 10 Dangar Street, Wickham, NSW. The site is located within the Newcastle local government area (LGA) and occupies a prominent corner position immediately north of the Newcastle Interchange.

The project has been selected by the NSW Housing Delivery Authority (HDA) as a key development to help accelerate the delivery of well-located, diverse and affordable housing in New South Wales. Commencing in early 2025, the HDA plays a coordinating role across government agencies, focusing on unlocking complex sites through strategic planning, infrastructure coordination, and streamlined assessment pathways.

Following the Applicant's expression of interest (EOI 240837), the HDA considered and recommended to the Minister for Planning and Public Spaces (the Minister) that the project be declared SSD under Section 4.36(3) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 23 June 2025. Following this recommendation, the development was declared by the Minister to be SSD pursuant to the *State Significant Development Declaration Order 2025 (No 10)*, Part 2, Section 1(a), dated 30 June 2025.

2 PROJECT BACKGROUND

The site was identified under the *Wickham Master Plan 2017* as a strategically significant location for increased development capacity, given its proximity to the Newcastle Interchange and its potential to support high-density, mixed-use development. The Master Plan proposed an uplift in planning controls, increasing the permissible building height from 45 m to 60 m, and the FSR from 5:1 to 6:1, subject to the delivery of public domain improvements, including a 3-metre southern setback adjacent to the transport interchange.

This strategic vision was subsequently reaffirmed in the *Wickham Master Plan 2021 Update* (PP-2021-1506) and further refined in the 2022 amendment, which supported additional incentive-based planning controls.

The Community Infrastructure Incentives in Wickham Planning Proposal (PP-2022/1541), endorsed by Council in March 2022 (and subsequently approved 08 November 2022), proposed:

- An incentive FSR of 7:1 for Area E (the site),
- A maximum incentive building height of 60 m, and
- Community infrastructure requirements.

In alignment with these strategies, the site has been subject to successive development consents as outlined in the Environmental Impact Statement (EIS) prepared by Beam Planning. These prior consents have been physically commenced through demolition and excavation works and establish the maximum envelope for basement structures. This SSDA will adopt and refine these commenced elements to expedite the assessment process, continue construction progress on the site, and ensure continuity with previously endorsed planning outcomes.

3 THE PROPOSAL

3.1 Rezoning Proposal

To facilitate the proposed development described in Section 3.2, a concurrent Rezoning Proposal is sought to make the following amendments to the *Newcastle Local Environmental Plan 2012* (Newcastle LEP 2012) in relation to the site:

- Amend Clause 7.9 to permit a maximum building height of 152 m on the site; and,
- Amend the Clause 7.9A to permit a maximum FSR of 14.4:1 on the site.

3.2 State Significant Development Application

The proposed amendments to the Newcastle LEP 2012, as outlined above, will facilitate the following development, proposed via a concurrent SSDA. Specifically, the proposed works sought under the SSDA include:

- Construction of a 43-storey (+ plant) mixed-use tower, comprising:
 - 245 residential apartments
 - 99 co-living units
 - Ground floor retail premises, to all three street frontages
 - A hotel component within the podium
 - Basement car parking
- Associated landscaping and public domain improvements, including the provision of a pedestrian through-site link that runs east/west adjacent to the Newcastle Interchange.

It is noted that the project will commit to providing 15% of the residential GFA as affordable housing for a minimum of 15 years, to be managed by a registered Community Housing Provider (CHP).

The proposed SSDA will seek consent for the use of basement structures and enabling works approved under DA2018/01197 (as modified).

For a detailed description of the proposed development, refer to the EIS prepared by Beam Planning, and the Architectural Drawings prepared by SJB Architecture.

4 THE SITE

The site is located at 10 Dangar Street, Wickham, within the Newcastle LGA. The site benefits from triple street frontages, with a primary street frontage of approximately 64 m to Dangar Street, and secondary street frontages of approximately 61 m to Hannell Street and 50 m to Charles Street.

The surrounding locality comprises a diverse mix of land uses including residential, commercial, and light industrial uses, reflecting the area's ongoing transition. The site's frontage to Hannell Street, a major arterial road, supports high levels of connectivity to the broader metropolitan area. The site is located immediately north of the Newcastle Interchange, providing bus, rail and light rail services. Strategically, the site sits at the intersection of the Newcastle West End, Wickham, and Honeysuckle precincts, positioning it to support the city's transition to a higher-density, mixed use metropolitan centre.

The site is currently vacant following demolition works approved under DA2018/01197 (as modified).

Figure 4-1 illustrates the location of the site.



Figure 4-1: Aerial Photo

5 RELEVANT SEARS/REZONING REQUIREMENTS

This Fire Engineering Statement addresses the following relevant Secretary's Environmental Assessment Requirements (SEARs) and Guidance for Concurrent Rezoning Report: SSD Housing issued for the project set out in the table below.

Table 5-1: SEARs Compliance Table

Requirement	Response/ Location in Report
SEARs Requirement	
Not Applicable	Not applicable
Rezoning Requirement	
Not Applicable	Not Applicable
Additional Assessment Requirements	
Not Applicable	Not Applicable

6 PROPOSED PERFORMANCE SOLUTIONS

The proposed development comprises a 43-storey mixed-use tower. Car parking (Class 7a) is proposed within three basement levels, with retail (Class 6) and the hotel lobby (Class 3) provided at ground level (Level 00). Levels 1 to 5 comprise hotel rooms, while Level 6 contains dining, health club, outdoor space and food production areas associated with the hotel. Class 2 residential apartments are provided from Level 7 to Level 42, with Level 43 and the roof containing plant equipment.

A Building Code of Australia Volume 1, 2022 Amendment 2 (BCA) review has been undertaken by DC Partnership, reference SYD225_128-2 (BCA) JR, dated 31 March 2026. This report identifies a number of non-compliances with the Deemed-to-Satisfy Provisions of the BCA, which will be addressed by Holmes through the development of Performance Solutions where required.

Holmes will provide performance based solutions to comply with the relevant Performance Requirements of the BCA for the identified issues.

The design approach will be in line with the Australian Fire Engineering Guidelines¹ and other acceptable guideline documents. The Performance Solution designs will be developed in line with BCA Clause A2G2, as applicable; i.e. complying with the relevant Performance Requirements or by equivalence comparison with the Deemed-to-Satisfy Provisions.

¹ Australian Building Codes Board, "Australian Fire Engineering Guidelines," Australian Building Codes Board, Canberra, 2021.

The proposed approach of the Performance Solution for each issue is listed below. Holmes understands that all other aspects of the building will comply with the Deemed-to-Satisfy Provisions of the BCA.

- 1) BCA Clauses C2D2, C3D8, C3D9 and C3D10 require that where multiple classifications are located on a single storey, the classifications are to be separated by the relevant FRL of the classifications, or the entire storey shall be constructed to the highest FRL requirements. Level 00 contains multiple classifications on a single storey, however the separation is proposed to be rationalised. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2.
- 2) BCA Clauses C2D2, C3D8, C3D9 and C3D10 requires the retail areas to achieve an FRL of no less than (180)/180/180 generally, and to be separated from adjacent spaces with this FRL. It is proposed to provide a reduced FRL in the retail areas to (120)/120/120 generally. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2.
- 3) BCA Clauses C2D2 and S5C8 require fire-rated shafts to be enclosed at the top and bottom by construction having an FRL not less than that required for non-loadbearing shaft walls in the same building. A Performance Solution adopting an absolute approach will be developed to address Performance Requirement C1P2 in relation to the following locations, where the base of the shaft will not be fire-rated:
 - Level 00: Bulky waste chute.
 - Level 01: Linen chute opening into the housekeeping room.
- 4) BCA Clause C2D2 and Spec S5C11 requires the bounding walls separating Class 2 or 3 public corridors from adjoining rooms to achieve the prescribed FRL. Where glazing is proposed within common room walls and bounding the public corridors on Levels 07 to 11, a Performance Solution using a comparative approach may be developed to justify the arrangement, likely requiring wall wetting sprinklers (Tyco WS or equivalent) to the glazing to address Performance Requirements C1P2 and C1P8.
- 5) BCA Clause C3D15 requires public corridors in Class 2 and 3 buildings exceeding 40 m in length to be divided into sections of 40 m or less by smoke proof construction. The public corridors on the hotel and residential levels are proposed to be divided into sections by smoke proof construction, with a maximum corridor length of approximately 60 m. A Performance Solution using a comparative approach is proposed to address Performance Requirements D1P4 and E2P2.
- 6) BCA Clause D2D3 requires that for a Class 2 to 8 building that has an effective height of more than 25 m, in addition to any horizontal exit, not less than 2 exits must be provided. The pump room on Basement 01 is served by a single exit. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4.
- 7) BCA Clause D2D5 and D2D6 requires for a Class 2 and 3 occupancies travel distances are to be a maximum of 6 m from an SOU entry door to a point of choice of exits, 20 m from an area not within an SOU to a point of choice and 45 m between exits through the point of choice. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 from the following locations:
 - Travel distance up to 12 m to a point of choice from Class 2 and Class 3 SOU entry doors
 - Level 06: Travel distance up to 30 m to a point of choice from communal open space areas

- 8) BCA Clause D2D5 and D2D6 requires for a Class 5, 6, 7a and 7b occupancies travel distances to be a maximum of 20 m to an exit or point of choice, 40 m to an exit from a point of choice at which travel in two directions is available and 60 m between exits. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 from the following locations:
 - Basement 01-03: Travel distance up to 30 m to a point of choice, total of up to 60 m to the nearest exit.
 - Basement 01-03: Alternative exits located up to 80 m apart nominally (in lieu of 60 m).
 - Level 00B: Travel distance up to 30 m to a point of choice.
 - Level 06: Travel distance up to 30 m to a point of choice from the food production areas
- 9) BCA Clause D2D6(b) requires alternative exits to be located no less than 9 m apart. A Performance Solution using an absolute approach will be provided to address Performance Requirement D1P4 where the exits are no less than 6 m apart on Basement 03 and Level 42.
- 10) BCA Clause D2D12 requires a doorway from a room to not open directly into a stairway, passageway or ramp that is required to be fire-isolated unless it is from a public corridor, public lobby or the like, an SOU occupying all of a storey, or a sanitary compartment, airlock, or the like. There are doors into fire-isolated stairways from the exhaust plant room on Level 00B and from the lift motor room on the plant level that do not meet these criteria. A Performance Solution using a comparative assessment will be provided to address Performance Requirement D1P5 and E2P2.
- 11) BCA Clause D2D12(2)(c) requires that where a fire-isolated stairway discharges into a covered area, the covered area must adjoin a road or open space and provide an unimpeded path of travel to the road or open space of not more than 6 m. Stairs 1 and 2 from the Basements, and Tower Stair 1 discharge into a covered area adjacent to Dangar Street which requires travel of approximately 10 m to reach open space. A Performance Solution using an absolute approach will be provided to address Performance Requirement D1P5.
- 12) Clause D2D12(2) requires each fire-isolated stairway to provide independent egress from each storey served and to discharge directly, or via its own fire-isolated passageway, to a road or open space or to another discharge location permitted by Clauses D2D12(2)(a) to (c). Basement Stairs 1 and 2 serve as alternative exits from the basement levels. Tower Stair 2 discharges into the co-living lobby, resulting in a non-compliance with Clause D2D12(2). A Performance Solution using an absolute approach to address Performance Requirements D1P5 and E2P2.
- 13) BCA Clause D2D12(3) requires that where the path of travel from the point of discharge of a fire-isolated exit requires occupants to pass within 6 m of openings in the external wall of the building, these openings are required to be protected in accordance with Clause C4D5. The path of travel from the fire-isolated stairs which discharge adjacent to the hotel lobby requires occupants to pass within 6 m of openings in the external wall, however, these openings are not proposed to be protected in full in accordance with Clause C4D5. A Performance Solution using an absolute approach to address Performance Requirements D1P4, D1P5 and E2P2, allowing for a rationalised level of protection.
- 14) BCA Clause D2D15 requires that the discharge of alternative exits to be as far apart as practical. The discharge of Stairs 1 and 2 from both the basements and the towers are adjacent to each other. A

Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4 and E2P2.

- 15) BCA Clause D3D5 requires that there must be no direct connection between rising and descending stairs on the level of discharge. Stair 4, which serves the basements and the exhaust plant room on Level 00B, does not have the required separation on the discharge level. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P5 and E2P2.
- 16) BCA Clause D3D13 permits exits to discharge to a roof of a building if the roof does not have any rooflights or other openings within 3 m of the path of travel of persons evacuating across that roof to reach an open space. The building will have exits discharging across the slab above the basements, and this slab will have drainage openings within 3 m of the discharge path, technically not permitted by this clause. A Performance Solution using an absolute approach will be provided to address Performance Requirement C1P2.
- 17) BCA Clause E1D2 requires a fire hydrant system in accordance with AS 2419.1-2021. Where a building has an effective height greater than 25 m the fire hydrant system must incorporate a ring main. AS 2419.1-2021 permits the ring main to cross between scissor stair shafts as per Clause 8.6.2.1(c), however where a combined fire hydrant and sprinkler system is provided in accordance with AS 2118.6-2012, the vertical portions of the ring mains shall be located within separate fire-isolated stairs or fire rated risers, as AS 2118.6-2012 does not explicitly address scissor stairs. The vertical portions of the ring mains in the proposed design pass through both sides of the scissor stairs. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P3.
- 18) BCA Clause E1D2 requires a fire hydrant system in accordance with AS 2419.1-2021. In order to achieve hydrant coverage, supplementary hydrants are likely to be required along the path of travel on the floors. A Performance Solution using an absolute approach can be provided to address Performance Requirement E1P3.
- 19) BCA Clause E1D2 requires the booster location to be within line of sight of the principal pedestrian entrance. The booster is proposed to be located adjacent to the vehicle entry to the basement carpark. Based on the building layout, there is no obvious designated principal pedestrian entrance. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P3.
- 20) BCA Clause E1D2 requires a fire hydrant system in accordance with AS 2419.1-2021. Clause 1.1(c) of this standard states that AS 2419.1-2021 applies only to buildings having an effective height of not more than 135 m. As the subject building will exceed this height, the fire hydrant system falls outside the scope of the Standard and must be addressed by way of a Performance Solution.
- 21) BCA Clause E1D3 requires that fire hose reels must be located so that the fire hose will not need to pass through doorways fitted with fire or smoke doors. As it is proposed to fire rate the MSB room and the bulky waste at the base of the garbage chutes, as part of the performance solution to omit sprinkler protection within these rooms, fire hose reels would need to pass across fire or smoke doors to achieve coverage, or additional fire hose reels would be required within these rooms. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P1 in lieu of providing additional fire hose reels in these rooms.
- 22) BCA Clause E1D4 and E1D5 requires that buildings over 25 m are to be provided with sprinklers throughout the whole building and in accordance with AS 2118.1-2017. The main switch board

room and the adjacent comms room is proposed to omit the sprinkler protection. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P4.

- 23) BCA Clause E2D6 requires a zone smoke control system. A Performance Solution using an absolute approach can be provided to rationalise or omit this system, addressing Performance Requirement E2P2.

Additionally, a special hazards assessment will be provided to address BCA Clauses E1D17 and E2D21 to address the provision of Electric Vehicle (EV) chargers.

7 SUMMARY

Based on Holmes's review of the project documentation, it is considered that performance based fire engineering can be utilised to demonstrate compliance with the Performance Requirements of the BCA without major changes to the current design. Additional issues may be identified as the design is further developed, however it is considered that there are no significant issues that would affect the building layout.

The information contained within this letter is based on the architectural drawings prepared by SJB Architects and as listed in Appendix A.

Please do not hesitate to contact Holmes, should there be any queries about the above.

Regards,

A handwritten signature in blue ink, appearing to read "E. Carlsson", with a long horizontal flourish extending to the right.

Erik Carlsson
Manager QLD | Project Director
BSc (Fire), NER, CPEng
Registered Certifier – Fire Safety (BDC3174)
Design Practitioner – Fire Safety (DEP0000102)
Professional Engineer – Fire Safety (PRE0000094)

APPENDIX A REFERENCED ARCHITECTURAL DRAWINGS

Dwg no.	Title	Date	Issue
DA-1004	FLOOR PLAN - BASEMENT 03	20/03/2026	27
DA-1005	FLOOR PLAN - BASEMENT 02	20/03/2026	27
DA-1006	FLOOR PLAN - BASEMENT 01	20/03/2026	27
DA-1009	FLOOR PLAN - LEVEL 00	20/03/2026	27
DA-1010	FLOOR PLAN - LEVEL 00B MEZZANINE	20/03/2026	27
DA-1011	FLOOR PLAN - LEVEL 01	20/03/2026	27
DA-1012	FLOOR PLAN - LEVEL 02	20/03/2026	27
DA-1013	FLOOR PLAN - LEVEL 03	20/03/2026	27
DA-1014	FLOOR PLAN - LEVEL 04	20/03/2026	27
DA-1015	FLOOR PLAN - LEVEL 05	20/03/2026	27
DA-1016	FLOOR PLAN - LEVEL 06	20/03/2026	27
DA-1017	FLOOR PLAN - LEVEL 07 CO-LIVING	20/03/2026	27
DA-1018	FLOOR PLAN - LEVEL 08-11 CO-LIVING	20/03/2026	27
DA-1022	FLOOR PLAN - LEVEL 12-16	20/03/2026	27
DA-1027	FLOOR PLAN - LEVEL 17	20/03/2026	27
DA-1028	FLOOR PLAN - LEVEL 18-20	20/03/2026	27
DA-1031	FLOOR PLAN - LEVEL 21-40	20/03/2026	27
DA-1051	FLOOR PLAN - LEVEL 41	20/03/2026	27
DA-1052	FLOOR PLAN - LEVEL 42	20/03/2026	27
DA-1053	FLOOR PLAN - PLANT	20/03/2026	27
DA-1060	FLOOR PLAN - ROOF	20/03/2026	27
DA-1401	ELEVATIONS - NORTH	20/03/2026	27