

Objection to the State Significant Development 43-Floors (approx. 150m) at 10 Dangar St, Wickham

A building so tall that it challenges the natural landscape, Glenrock State Conservation Area, Charlestown and the Great Dividing Ranges

The proposed tower is of such an extreme height that it would become the most visually dominant structure in the region, challenging the prominence of Newcastle's natural landscape. At approximately 150 metres in height, the building would exceed the elevation of several significant local landforms, including the highest points of Glenrock State Conservation Area (101 metres above sea level), Munibung Hill (121 metres above sea level), and the ridgeline approached via the Pacific Highway at Charlestown (approximately 143 metres above sea level).

In practical terms, the tower would remain the dominant vertical element across much of the Newcastle urban area until the Great Dividing Range is reached. This scale is not only inconsistent with the intended character of Wickham but is also disproportionate to the natural topography that defines the region. Rather than complementing Newcastle's landscape setting, the proposal competes with it, creating an artificial landmark that overwhelms both the built and natural environment. The proposed height is excessive, an offence to the natural landscape surrounding Newcastle and should be rejected on the basis of its adverse visual impact and incompatibility with the surrounding natural landscape character.

Reference: <https://portal.spatial.nsw.gov.au/portal/home/webscene/viewer.html?layers=fd9367522d8b45848ef7eebfc3454903>

Dead and Inactive Edge Conditions on the Ground Floor and Lack of Passive Surveillance

The proposed ground-floor interface is dominated by building services and back-of-house functions, with no active retail frontage provided along Hannell Street and Dangar Street. As indicated on Sheet DA-1009, the primary retail activation is oriented towards the transport interchange and Hannell St, areas that already benefit from high pedestrian activity and passive surveillance. In contrast, the Charles Street and Dangar Street frontages are largely occupied by servicing areas, resulting in inactive edges and reduced pedestrian engagement along key sections of the public

domain. The design essentially treats the residential areas of Wickham as a “Back Alley”.

It is also important to note that two of the three foyers primarily function as unoccupied transitory circulation spaces and are therefore unlikely to contribute meaningfully to passive surveillance outcomes. Collectively, this creates a poor urban design outcome for Wickham by effectively treating substantial portions of the surrounding streetscape as secondary service interfaces rather than active public-facing frontages. The proposal fails to positively contribute to the activation, safety, and amenity of the areas where residents and pedestrians primarily interact with the public domain.

Lastly, the development will contribute to the continuation of inactive and poorly activated façades already prevalent throughout the Wickham streetscape.

Established urban design research indicates that passive surveillance is most effective within the lower building levels, specifically the first four storeys. In this proposal, these lower levels are occupied by hotel podium uses that accommodate transient occupants, preventing any meaningful visual or social connection with the street.

While the social impact assessment prepared by Sarah George Consulting states that the proposal will improve passive surveillance, under further scrutiny, the architectural plans prepared by SJB suggest that no measurable improvement in passive surveillance outcomes will be achieved along the Wickham public domain when the proposal is examined in detail.

Socio-spatial Stratification - Baked in Inequality by Design and Purpose

The proposed mix of 42 affordable housing units, 99 co-living units, and NDIS accommodation, included in the 300 dwellings within a single high-rise structure, introduces a highly stratified residential arrangement. The design includes three separate foyers, indicating differentiated access points for distinct resident groups.

The Sarah Gore Consulting report identifies the project as accommodating very low to moderate-income households. However, the spatial organisation of access, circulation, and shared amenities suggests a segmented internal structure in which residents are effectively grouped according to tenure and income category.

This arrangement risks reinforcing socio-economic stratification within a single building, where different resident cohorts experience varying levels of privacy, access, integration and amenity. While mixed-tenure housing is often promoted as an inclusive model, the degree of separation evident in the design limits genuine social integration and instead embeds hierarchical living conditions within the built form.

Unequitable Distribution of Affordable Housing in the Region

The proposal indicates approximately 300 dwellings, comprising NDIS housing, 99 co-living units, and 42 social housing dwellings. It is also framed against a broader government commitment to deliver 11,100 homes across the region. On this basis, the development allocates approximately 2.7% of the total housing target to a single tower in Wickham. While higher-density contributions are expected in urban renewal contexts, the scale of concentration raises questions about spatial balance across Wickham and Newcastle as a whole.

Another key concern is the uneven distribution of social and affordable housing obligations across precincts. Nearby major redevelopment areas with extreme scale, such as Honeysuckle HQ and Broadmeadow, are not subject to the same affordable housing requirements, despite their significant redevelopment potential and investment. This raises issues of consistency in planning expectations across adjacent urban precincts.

The NSW Government has previously indicated its intention to provide up to 30% of social and affordable housing within relevant precinct frameworks. However, the application of this target appears inconsistent across sites, with a disproportionate share of affordable and social housing delivered in Wickham next to the interchange. Wickham's 30% contribution to affordable housing is significantly higher than the 0% contribution required for Honeysuckle HQ and Broadmeadow redevelopment.

A more equitable planning approach would ensure that the 30% social and affordable housing obligations are consistently applied across all major precincts, including Honeysuckle HQ and Broadmeadow, rather than being concentrated in a single locality and a single tower in Wickham, which fails to deliver balanced, reasonable planning outcomes.

Reference: Newcastle Weekly (2023).<https://newcastleweekly.com.au/newcastle-greens-disappointed-housing-for-everyone-dropped-from-honeysuckle-hq/>

Poor Quality of Submission and Multiple Inconsistencies

The overall quality and coordination of the submitted documentation are poor, with multiple inconsistencies and contradictions identified across key documents. This creates substantial confusion regarding the proposed tower composition, height, dwelling numbers, and occupancy arrangements, making it difficult for the public to properly understand and assess the proposal. The submission appears inadequately coordinated and should be comprehensively reviewed for errors, inconsistencies, and conflicting information prior to determination.

These discrepancies undermine confidence in the accuracy and reliability of the application materials and limit the community's ability to make informed submissions. Examples of some but not all inconsistencies include:

1. The Planning Portal describes the proposal as a “43-storey mixed-use development with approximately 200 dwellings (including 42 affordable housing dwellings) and 99 co-living units, including parking, ground floor retail, hotel with associated facilities, public through-site links and plaza.”
2. The Environmental Impact Statement and Rezoning Report (p.137) instead state that the proposal will provide “245 apartments (plus 99 co-living units), contributing to growth in a strategically important renewal precinct.”
3. The Social Impact Assessment (p.9) instead refers to “249 residential apartments with the following mix”.
4. The Connecting with Country Country-Centred Design & Cultural Integration Framework Page (p.5) features basic spelling mistakes such as “SSustained efforts have been made to engage...”
5. Predevelopment Application CoN (p.2) states “The proposal has height of approximately 149 metres...”
6. The Architectural Drawings (P. DA-0351) state 150.90m RL.
7. Figure 9 on page (p.32) of the Environmental Impact Statement and Rezoning Report shows the building height to be 152m

These differing figures and the overall poor quality raise uncertainty about the actual residential yield, the occupancy composition, the scale of the proposal, and its merit.

The developer should be required to resubmit all documents with errata fixed for reassessment and re-exhibition to the public.

Lack of Genuine Community Consultation over the Proposed Tallest Building in Newcastle LGA

The developer's consultation process is inadequate, as evidenced by the limited community consultation undertaken and the documentation submitted for exhibition. The engagement activities described in the Environmental Impact Statement were limited in scale and procedural in nature rather than genuinely participatory. Concerning the largest community action group for Wickham, Great Lifestyle of Wickham (GLOW), it was excluded from the consultation process, despite its recognised role as an active community organisation within Wickham. The omission underscores that engagement with key local stakeholders was inadequate.

Public participation was relatively low throughout the engagement process. According to the developer's own figures, consultation comprised a letterbox drop to 488 properties, which generated 30 responses; an online survey with 53 responses collected over 8 weeks; and a single online webinar attended by 10 members of the public. This level of engagement is insufficient for a project of this scale and significance, as it is proposed to be the largest building in the Newcastle LGA.

Community concerns relating to building height, overshadowing, traffic impacts, construction disruption, infrastructure capacity, and the erosion of neighbourhood character have been consistently dismissed through references to technical reports and Environmental Impact Statement sections. It appears that consultation outcomes did not meaningfully influence the design or reduce the scale of the proposal. As a result, the process undertaken can be characterised as administrative rather than collaborative and community-focused.

Overall, the proposal undermines established planning controls, weakens accountability to prior community commitments, and fails to demonstrate meaningful engagement with affected residents and organisations.

Lack of Acid Sulphate Soil Management and Environmental Risk Assessment

The site at 10 Dangar Street is identified within the NSW eSPADE mapping system as “H2”, meaning having a high probability of containing acid sulphate soils between 1 and 3 metres below ground level. Given the substantial excavation that has already been undertaken for the proposed development, it is highly likely that these soils will be disturbed during excavation and construction. Despite this known risk, there appears to be limited publicly available information detailing how acid sulphate soils will be identified, managed, treated, transported, discharged or monitored throughout the excavation and construction process.

Acid sulphate soils present a significant environmental risk when exposed to air, generating sulphuric acid that can mobilise heavy metals, contaminate waterways, damage infrastructure, and adversely affect aquatic ecosystems. This risk is particularly relevant given the site's proximity to Throsby Creek and the broader estuarine environment. During inspection of the site boundaries, as shown in Figure 1, visible brown-orange staining was observed on exposed surfaces, potentially indicating iron oxide deposits commonly associated with oxidised acid sulphate soils. While this observation alone does not confirm their presence, it highlights the need for greater transparency regarding site investigations and management measures.

Given the environmental sensitivity of the Throsby Creek catchment, the community should be provided with clear information regarding how acid sulphate soil runoff, groundwater impacts, dewatering activities, and off-site environmental risks will be managed. The apparent absence of detailed discussion on this issue within the publicly exhibited documentation is concerning, particularly given the well-established environmental hazards associated with acid sulphate soils. A project of this scale and significance should not proceed or be approved without a comprehensive disclosure of the proposed management framework and an independent assessment of potential impacts on the surrounding ecosystems and the Wickham community.



Figure 1 (Author's Own) June 2026. Orange-brown staining of ground and site runoff

Reference: <https://espade.environment.nsw.gov.au/>

Unprecedented Emergency Response Requirements and Reliance on Performance-Based Fire Solutions

The proposed development raises significant concerns regarding emergency management, fire safety, and evacuation planning for what would become the tallest residential building in the Newcastle Local Government Area. Despite accommodating an estimated 700 or more residents, hotel guests, visitors, and staff, the publicly exhibited documentation provides little clarity regarding how occupants would be safely evacuated or where they would assemble during a major emergency. It remains unclear whether evacuees would be directed into surrounding Wickham streets, the transport interchange, nearby public spaces, or the Honeysuckle foreshore. Given the scale of the building and its constrained urban location, the management of such a large number of people during an emergency warrants far greater scrutiny.

The proposal also relies heavily on performance-based fire engineering solutions to address departures from the Deemed-to-Satisfy provisions of the National Construction Code. Notably, the retail components are proposed to achieve a Fire Resistance Level (FRL) of (120)/120/120 rather than the (180)/180/180 standard typically required under Clauses C2D2, C3D8, C3D9 and C3D10. While a Performance Solution is proposed to demonstrate compliance, the reduction in passive fire protection is concerning given the scale, height, and occupancy of the building. In a development of this magnitude, fire safety measures should exceed minimum expectations rather than rely on reduced standards justified through alternative assessment pathways.

Further concerns arise from the fire engineering report itself, which repeatedly relies on performance-based solutions because the proposed building exceeds the height limits contemplated by many Australian Standards. This highlights a fundamental issue: the proposal is so large that established prescriptive standards are no longer sufficient, requiring alternative approaches across multiple aspects of fire and life safety design. While performance-based design has an important role within the planning system, the cumulative reliance on such solutions introduces additional uncertainty regarding emergency performance outcomes.

The documentation also notes that a Performance Solution is required to address Performance Requirement E1P3 due to the absence of a clearly identifiable principal pedestrian entrance. The fact that the main entrance to the building cannot be readily determined from the architectural plans raises concerns regarding legibility, wayfinding, emergency access, and evacuation procedures.

Finally, the broader emergency management implications for Newcastle LGA have not been adequately addressed. A fire-based major incident involving a 43-storey tower would be unprecedented for the city and would occur at a critical transport junction located near Hannell Street, Stewart Avenue, Wharf Road, and the Newcastle Interchange. The potential impacts on emergency service access, traffic management, evacuation coordination, and surrounding TfNSW infrastructure could be substantial and devastating. Given the scale of the proposal, a more detailed assessment is required to demonstrate that local emergency services, infrastructure,

and evacuation arrangements are capable of responding effectively to a major incident within the building in a timely manner.

Reference: Appendix XX - Fire Engineering Statement

Misleading Visualisations and Unrealistic Landscape Representation

The visual rendered material presented to the public appears to understate the true scale and massing of the proposed development through the use of unrealistic landscaping and inaccurate representations of the surrounding environment. For a project of this significance, the community should be able to rely on visualisations that accurately depict how the building will appear once constructed.

Sheet DA-2502 depicts mature eucalyptus trees of a scale and height that are highly unlikely to ever be achieved within Wickham. The area is characterised by poor soil conditions, a history of industrial land use, limited planting volumes, wind exposure, and overshadowing from surrounding development. Existing street trees throughout Wickham, including those along Railway Street and Dangar St, demonstrate the challenges associated with establishing large canopy vegetation in the locality. The oversized trees shown in the render appear to have been strategically positioned to soften and visually obscure the substantial bulk of the podium, creating a more favourable impression of the development than would likely occur in reality.

Similarly, Sheet DA-2503 presents a representation of the Newcastle Interchange that does not accurately reflect existing conditions. Elements of the interchange appear to be visually infilled with buildings despite the open nature of the space beyond the ticketing area. This has the effect of altering the perceived relationship between the development and its surroundings and reducing the apparent visual dominance of the building. Once again, large mature trees are used throughout the image to break up the scale of the podium and tower, despite there being little evidence that vegetation of this size could be established or maintained on the site.

The repeated use of oversized landscaping and altered contextual conditions raises concerns regarding the reliability of the visual material presented during public exhibition. Visualisations prepared for community consultation should provide an accurate and realistic representation of the built outcome, rather than relying on

idealised "green screen" landscaping to disguise the building's true scale and impact at street level. For a development that would become the tallest building in Newcastle, the public is entitled to visual information that is transparent, realistic, and not potentially misleading.

Reference: Appendix L - Architectural Drawings

Failure to Deliver Meaningful Public Domain Improvements

The proposal seeks substantial increases in both building height and floor space ratio beyond the standard controls permitted under the Newcastle Local Environmental Plan. These additional development rights are intended to be justified by the provision of community infrastructure; however, the proposal fails to deliver public-domain improvements proportionate to the scale of the uplift sought.

Despite introducing a significant increase in residential population, hotel guests, visitors, pedestrian movements, and cycling demand around the Newcastle Interchange, the proposal does not provide upgrades to Dangar Street, Charles Street, or Station Street. Instead, the landscape plans simply state that the "existing public domain is retained and protected". This is an inadequate response for a development of this magnitude, particularly when existing footpaths and public infrastructure in the area are already deteriorating, and previous approvals for the site required public domain improvements at no cost to Council.

The applicant presents the proposed 3m-wide through-site links and plazas as public benefits; however, these spaces should be regarded as the minimum expected outcome for a development adjoining a major transport interchange rather than as community infrastructure. They remain under private ownership and control, are not dedicated to the City of Newcastle, and may be altered, restricted, or repurposed in the future to suit the development's operational needs. As such, they cannot reasonably be relied upon as long-term community assets.

The proposal also fails to demonstrate consistency with the Wickham Community Infrastructure Plan and Community Infrastructure Incentives Policy, both of which require infrastructure contributions to be proportionate to the additional development

capacity being granted. Given the scale of the proposed uplift, there is a strong case that substantial public domain works should be delivered, including the reconstruction and upgrade of Dangar Street, Charles Street, and Station Street in accordance with the adopted Wickham Public Domain Plan and the established design quality delivered through the Union Street public domain upgrades.

The applicant should be required to fully reconstruct and upgrade Dangar Street, Charles Street, and Station Street in accordance with the Wickham Public Domain Plan and the design standard established by the Union Street public domain upgrades. Independent costings should be provided, together with a works-in-kind contribution or equivalent funding to deliver these improvements. Such an approach is consistent with the City of Newcastle Community Infrastructure Incentives Policy and the Wickham Community Infrastructure Plan, which require community infrastructure contributions to be proportionate to the additional height and floor space being sought.

The proposal seeks the benefits of significantly increased height and floor space while providing fewer public spaces than the minimum required for the building to function. The community infrastructure offered is not proportionate to the scale of the planning concessions requested, resulting in an inequitable outcome for existing residents and the broader Wickham community.

Need for a Dedicated Community Liaison Officer and Independent Compliance Officer During Construction

Should the development proceed, a project of this scale and significance should be required to provide a dedicated community liaison service available 24 hours a day, seven days a week, with direct contact via telephone and email. Given the size, duration, and complexity of the construction works, local residents must have access to a responsive and accountable point of contact capable of addressing concerns as they arise.

Recent major construction projects in Wickham have demonstrated the significant impacts that large-scale developments can have on surrounding residents. Traffic management measures have frequently resulted in substantial delays and disruption

within the area's constrained one-way street network, making access to homes difficult during peak periods. Residents have also experienced construction activities occurring outside approved working hours, resulting in noise disturbance during evenings, overnight periods, and early mornings. Debris on roads left by builders and construction workers has also caused flat tyres in the community.

Given these negative experiences, the proposal should also require funding for an independent compliance officer and certifier who is available to receive and investigate community complaints throughout the construction period. Reliance solely on the developer's internal complaints process provides limited confidence that issues will be addressed transparently or impartially. Given that the largest building ever constructed in Newcastle LGA would be a robust community accountability framework, it should be considered a minimum requirement rather than an optional measure.

On the basis of the above issues with the development, I object to this development.

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