

Submission Regarding SSD Proposal – DA2025/00976 10 Dangar & Hannell Street, Wickham Urban Village / Newcastle West End, Honeysuckle Stage 2. NSW

To Whom It May Concern,

I object to the proposed State Significant Development (SSD) at 10 Dangar Street, destroying Urban Village Wickham, on the basis that the proposal represents a profound departure from established NSW planning instruments, strategic regional planning, local character protections, infrastructure coordination principles, and public safety considerations that have guided Newcastle's urban development for decades. The proposal undermines the integrity of long-standing planning frameworks that were carefully developed to balance population growth, economic development, infrastructure delivery, liveability, heritage, urban character, environmental sustainability, and public safety.

(WILL IT BECOME A LEANING TOWER?)

The proposed 43-storey tower is inconsistent because it is abusing Newcastle Planning Instruments following on with constant redesign through various attempt 2018 /01197 modified DA 2022/00448 and now fails with the strategic foundations that shaped the Newcastle West End, Honeysuckle, Wickham Urban Village Corridor narrowing into Newcastle peninsula city precinct.

Immediate social affordable purpose housing supply alone in this proposal is adhoc and will not solve the housing crisis yet that appears to be the sole focus of the state government's new Housing Delivery Authority (HDA).

This planning process removes local planning powers and prioritises announcing numbers of approved dwellings over liveable cities. 10 Dangar Street Wickham is the second development to be assessed under this State Significant Development HDA pathway after the highly controversial proposal at 47 Darby St. This Wickham site is adjacent The Urban Village of the WICKHAM MASTER PLAN aligned to the Newcastle Interchange and was previously approved for a 60m tall 'Bowline apartment' building before the site was purchased by a new owner. This location is opposite the NEWCASTLE QUAYS of HCCDC and the carefully considered Wickham Masterplan which took community, business, 4 terms of Councillors and Council staff 35 years to formulate for a balance to liveability on the peninsula. This Masterplan allows the height limit to be increased from 45m to 60m only if additional improvements are made to infrastructure by the developer.

The current proposal put forward by Urban Property Group is not clear / with many inconsistencies on exactly what building heights are in the suggested concepts. They are asking for a height re-zoning for 117m, but their designs show a 43 storey building with an RL of 152 which is between 145-150 metres tall. That's 250% higher than original height limit of 45m and 150% more than original Corridor Heights. To be clear, this is an extreme proposal that is completely ignoring Newcastle's planning controls. Under the HDA pathway, if a developer provides 15% affordable housing for 15 years, they are permitted at 30% height uplift. This would allow a height limit of 78m. Support of incentives to include affordable housing are ok, but these should be in perpetuity, not immediate and short term over reach impacting on the

entire built form of the city. The proposal makes no mention of Newcastle Council's Affordable Housing Contribution levy which requires 1% of affordable housing to be provided in perpetuity.

1. Departure from Established NSW Planning Instruments For decades, NSW planning law has relied upon a layered planning system consisting of: • Regional Strategies, • State Environmental Planning Policies (SEPPs), • Local Environmental Plans (LEPs), • Development Control Plans (DCPs), • Infrastructure planning frameworks, • Strategic transport coordination, and • Public domain and urban design controls. Since the 1990s, NSW planning policy has evolved through integrated regional planning models intended to provide certainty, orderly growth, and consistency in decision-making. The former regional city strategies, including the "Six Cities" planning approach and the Newcastle 2040 strategic framework, established principles including:

2. Damage to Newcastle West End, Wickham and Newcastle Quays HCCDC and Honeysuckle Newcastle Character.

The Wickham Honeysuckle Stage 2 precincts were never historically planned as isolated ultra-high-rise tower zones detached from infrastructure capacity or surrounding urban form.

The West End renewal strategy was intended to deliver:

- mixed-use activation,
- walkability,
- medium-to-high density with transition,
- employment growth,
- public waterfront access,
- compatible built form,
- fine-grain streetscapes,
- integrated transport,
- and liveable urban neighbourhoods.

The proposed scale of DA2025/00976 damages these objectives by overwhelming the established urban grain and visual hierarchy of the precinct.

Impacts on Urban Character The proposal risks:

- creating an isolated vertical overdevelopment inconsistent with surrounding built form;
- overshadowing public spaces and adjacent development;
- diminishing the visual coherence of the Newcastle peninsula;
- reducing the human-scale nature of Wickham urban village streets;
- undermining carefully planned transitions between heritage, rail, waterfront, and residential areas; and
- creating a precedent for uncontrolled tower escalation across the Newcastle West End.

The Honeysuckle and Wickham precincts were developed through decades of strategic planning intended to balance density with public amenity and accessibility. This proposal disrupts that balance. _____

3. Planning Policy Deconstruction and Erosion of LEP Integrity.

The proposal reflects a broader trend whereby planning standards are increasingly overridden under the justification of accelerated housing delivery and "build at any cost" policy settings.

If approved, this development would effectively:

- neutralise established LEP height and scale intentions;
- weaken DCP built-form guidance; • undermine strategic consistency across Newcastle;
- diminish confidence in planning law;
- and create uncertainty regarding future development assessment standards.

Planning controls only retain legitimacy if they are consistently applied. Where a proposal substantially exceeds intended scale and intensity without corresponding infrastructure upgrades or public benefit, the planning framework itself becomes compromised.

4. Inadequate Emergency Access and Public Safety Risks The proposal fails to adequately respond to the physical limitations of the Newcastle peninsula road network.

The surrounding streets — including:

- Hannell Street, • Bishopsgate Street, • Union Street, • Railway Street, • and adjoining laneways — originate from late nineteenth and early twentieth century urban layouts designed for vastly smaller populations and low-rise industrial activity.

These roads were never designed to service a 43-storey tower with associated population intensity.

Serious Concerns Include: • restricted emergency vehicle movement;

- limited evacuation capacity;
- traffic bottlenecks during critical incidents;
- constrained turning movements for fire appliances;
- inadequate staging space for emergency response operations;
- increased congestion around Wickham Interchange; • and cumulative pressure on the peninsula road system.

5. Lessons from the 2007 Pasha Bulker Disaster Newcastle has already experienced major emergency movement failures during the 2007 Pasha Bulker storm event.

During this disaster:

- access throughout Wickham, Honeysuckle, Cottage Creek and the CBD became heavily constrained;
- emergency services experienced movement restrictions;
- sections of the city became effectively isolated;
- and transport routes suffered severe congestion and operational disruption.

The proposed development intensifies existing vulnerabilities in the peninsula road network.

The question must be asked:

How would emergency evacuation, fire response, police access, ambulance access, SES coordination, and resident movement operate during a major storm event, flood event, infrastructure failure, hazardous material incident, or large-scale fire emergency involving a tower of this scale?

This issue requires independent assessment rather than perception, assumption and concepts.

6. Fire Safety and High-Rise Emergency Concerns The proposed 43-storey building raises substantial unresolved questions regarding fire safety capability within Newcastle.

Key Issues Include:

- whether current Fire and Rescue NSW equipment stationed locally can effectively service a tower of this height;
- limitations of aerial ladder reach;
- evacuation timeframes for hundreds of occupants;
- smoke management under extreme weather conditions;
- emergency refuge and stairwell capacity;
- and operational response limitations in constrained streets.

There is also concern regarding:

- water pressure,
- water storage,
- and firefighting supply capacity.

Clarification is required regarding whether existing Sydney Water infrastructure can adequately support high-rise firefighting operations for a building of this scale. The proposal should not proceed without transparent independent certification regarding emergency operational capability. _____

7. Infrastructure Deficiencies and Lack of Community Benefit The proposal appears to provide limited meaningful public benefit relative to its scale and impact. The development does not appear to proportionally contribute toward:

- major road upgrades; • emergency access improvements;
- public open space expansion; • community facilities; • transport capacity improvements;
- public domain upgrades;
- or substantial utility augmentation.

The burden of infrastructure demand is therefore transferred onto the wider Newcastle community. The scale of uplift should be matched by corresponding investment in city-supporting infrastructure

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8. Excessive Density Without Coordinated Social Planning Density alone does not create successful cities. Without proper infrastructure, public space, safety planning, transport integration, and community services, excessive density can create long-term urban dysfunction. Newcastle has previously experienced challenges associated with concentrated housing intensity and poorly coordinated social outcomes in some precincts.

The proposal risks repeating planning mistakes where density targets override:

- dysfunction stress layer over liveability,
 - safety,
 - segregated entrances and isolation with poor accessibility,
 - impact on regional culture and social cohesion,
 - and long-term urban functionality. Good planning must balance growth with capacity.
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9. Inconsistencies and Lack of Clarity in Application Documentation The application documentation for DA2025/00976 appears to contain inconsistencies regarding:

- irregular repetition stated about building height and measurements,
- planning metrics,
- and technical appendices. These inconsistencies raise concerns regarding:
 - assessment transparency,
 - technical accuracy,
 - and procedural integrity.

All discrepancies should be independently reviewed and clarified prior to any determination.

10. Strategic Precedent Risk for Newcastle Approval of this proposal would establish a precedent for substantial planning uplift across the Newcastle peninsula outside the intended framework of existing strategic controls and infrastructure of the city and Lower Hunter.

This risk:

- cumulative overdevelopment,
- erosion of public confidence in planning law,
- infrastructure overload,
- diminished urban character,
- and long-term planning instability.

The Lower Hunter peninsula Newcastle and HCCDC Newcastle Quays should evolve through coordinated strategic planning — not isolated tower approvals that override the intent of the broader planning of NSW Government planning Instruments.

Increasing housing supply alone will not solve the housing crisis yet that appears to be the sole focus of the state government's new Housing Delivery Authority (HDA).

This planning process removes local planning powers and prioritises announcing numbers of approved dwellings over liveable cities.

10 Dangar Street Wickham is the second development to be assessed under this State Significant Development HDA pathway after the highly controversial proposal at 47 Darby St.

This Wickham site is adjacent to the HCCDC Honeysuckle Precinct, Newcastle Quays Precinct with Newcastle interchange, it was previously approved for a 60m tall 'Bowline apartment' that has been re approve and re designed over a decade. This building on this site is now purchased by another new owner.

This location is included in the carefully considered Wickham Masterplan which took community, Councillors and Council staff years to formulate and agree to in context to HCCDC and Corridor Planning.

This Masterplan allows the height limit to be increased from 45m to 60m only if additional improvements are made to the area by the developer. The current proposal put forward by Urban Property Group is not clear on exactly what building height they are suggesting. They are asking for a height re-zoning for 117m, but their designs show a 43storey building with an RL of 152 which is between 145-150 metres tall. That's 250% higher than original height limit of 45m and

150% more than the Wickham Masterplan height of 60m. To be clear, this is an extreme proposal that is completely ignoring Newcastle's planning controls.

Under the HDA pathway, if a developer provides 15% affordable housing for 15 years, they are permitted at 30% height uplift. This would allow a height limit of 78m

Clearly the proposal makes no mention of Newcastle Council's Affordable Housing Contribution levy which requires 1% of affordable housing to be provided in perpetuity.

Failure to Deliver Meaningful Public Domain Improvements

- The proposal seeks a very large increase in permitted Height of Buildings and Floor-Space-Ratio. (Or instead, say a very large increase in gross floor area.)
- The proposal will materially increase pedestrian and cycling demand at and around Newcastle Interchange.
- The proposal DOES NOT upgrade Dangar, Charles and Station Streets, at no cost to council, as required by previously approved DAs on this site. Stating "[e]xisting public domain retained and protected" is unacceptable for a development of this scale (Urban drawing LD-DA100_1).
- The public spaces provided by the proposal are not community incentive infrastructure.
- They are the minimum public spaces expected for a development of this scale adjoining a major transport interchange.
- They are not dedicated to council.
- They can be re-purposed in the future to suit the building's needs.
- The proposal does NOT provide community incentive infrastructure proportionate to the large increase in GFA.
- The consent authority must require the applicant to fully deliver the public domain works identified in the Wickham Public Domain Plan for Dangar Street, Charles Street and Station Street as part of the incentive package.

EIS is poor, the applicant must do due diligence:

- Revise the EIS to show the full reconstruction of Dangar, Charles and Station Streets in line with Wickham Public Domain Plan and the look-and-feel of the Union St Wickham – Public Domain Works.
 - Provide independent costings and a works in kind offer or cash contribution sufficient to cover those works.
 - Enter a planning agreement or binding consent condition securing completion of these works prior to the first occupation of any dwellings or hotel rooms. (Most people won't know)
 - This approach is consistent with the City of Newcastle Community Benefit Infrastructure Incentives Policy and the adopted Wickham Community Infrastructure Plan, which requires community infrastructure delivery proportional to the uplift granted.
- NLEP provides increased HOB and FSR only when Community Benefit infrastructure is in place.
- There are NO public domain works proposed along Dangar, Charles or Station St; even though previously approved DA's required this at no cost to council. But there was Community Benefit agreements.
 - Urban drawing LD-DA100_1 says: "Existing public domain retained and protected" along Dangar, Charles, Station and Hannell Streets. this is misleading.

- Existing footpaths are already damaged, so “retained and protected” is NOT acceptable. Wickham has obsolete paths and unwalkable pathways.
- Best practice requires remediation/upgrade to current standards, not passive retention. • As a minimum, public domain works are required as per previously approved Consent Condition 22 to DA2018/01197.
- Public domain works to now align with the Wickham Public Domain Plan, is changes of the Wickham Masterplan
 - ie Public domain works to continue the look-and-feel of the Union St Wickham – Public Domain Upgrade.
 - Public domain works are independent of the community incentive infrastructure required for exceeding HOB 45m and FSR 6:1.
 - Public domain works are at no cost to the council.
 - The major east-west through-site link and plaza, north-south through-site link along Hannell Street, and plaza at the north-east of the site are NOT community incentive infrastructure.
 - While publicly accessible, these public spaces are NOT community incentive infrastructure.
 - These public spaces are, at best, the minimum expected for a development of this size adjoining a major interchange.
 - The building retains ownership and control of these spaces. They are not dedicated to the City of Newcastle. They can be repurposed in the future.

For example, outdoor seating can be extended, or the plaza can be closed for a private function.

- The major east-west through-site link and plaza DOES NOT fulfil Wickham Community Infrastructure Project Ref No. 12.
- Cyclists cannot use this plaza east-west link.
- Cyclists must be discouraged from using the existing, narrow link beside the Newcastle Interchange; it is not wide enough for a shared path.

- Approved DA2018/01197 and its modified DA2022/00448 did not provide for this widened, shared path.
- Shared paths are no longer considered acceptable; pedestrians and cyclists should be kept separate whenever possible.
- Planning instruments have changed to reflect the current situation.

Wickham Park and Honeysuckle are now being connected via an on-road cycleway along Station Street; and a proposed one off grant \$1 million Path, routed off Railway Street - Holland Street which is infrastructure approach for what is poor access in the Interchange area of 10 Dangar Street, by NSW Gov. now recognising the rapid growth with no access and many problems of no improved infrastructure around green spaces of Wickham.

See: lost is the Wickham Public Domain Plan. The proposed development must facilitate these public domain works along Dangar, Charles and Station Streets as per the original DA Consent Condition 22.

- The east-west link and plaza are public spaces required for a development of this scale to interface with Newcastle Interchange – it is NOT community incentive infrastructure.
- Community Benefit incentive infrastructure is required proportional to the uplift proposed.

- This is to be calculated on the Gross Floor Area in excess of NLEP Clause 4.3 and 4.4 requirements.
- NLEP Clause 4.4 FSR 6:1. Site area 2904 m². GFA = 17,424 m² maximum without community incentive.
- Applying NSW in-fill affordable housing bonus (AH Bonus) in full GFA = 17,424 m² + 30% = 22,651 m² maximum without community incentive.

The proposal is applying the AH Bonus quite differently.

- Proposed GFA = 41,348 m² (EIS Table 7, p.38). (There are different figures in various documents, so which one to use???)
- Incentive GFA = (41,348 m² - 22,651 m²) = 18,697 m²
- Wickham “Incentive GFA Rate” = \$579.72/ m² as of Sept 2023. This rate will need to be indexed.
- Incentive Monetary Contribution = 18,697 m² x \$579.72/ m² = \$10.84M
- For context, development cost = \$204.2M, so incentive monetary contribution is 5.31%
- Accessing the increasing GFA is voluntary.
- See City of Newcastle Community

Ref: Infrastructure Incentives Policy (2024) for justifications.

Support for Bulky Goods Storage, but is insufficient in size and capacity.

Support for the proposal should explicitly affirm the inclusion of bulky goods storage and situate it as a recurring deficiency in Wickham’s recent residential apartment developments. A consistent lack of adequate storage provision has created a functional gap across comparable Apartment blocks, underscoring the need for properly sized facilities as a baseline requirement rather than an optional design feature.

If the proposed provision is 52.3 m², this may be insufficient when benchmarked against relevant waste and resource recovery guidance. The derivation of this figure (Area = 344 units × 4/26) is unclear and should be verified against the NSW EPA Better Practice Guide for Resource Recovery in Residential Developments. Based on EPA-aligned assumptions, a more appropriate provision may be closer to 71 m², depending on unit typology and inclusion of fully furnished co-living arrangements.

Accordingly, submissions could:

- (1) strongly support bulky goods storage in principle;
- (2) highlight the ongoing shortfall in Wickham developments; and
- (3) request recalculation and confirmation of area provision against NSW EPA guidance, noting that the current figure may not meet best-practice benchmarks.

Year of Construction with Oversight and Community Accountability if approved, a development of this scale should be required to establish a dedicated community liaison office operating 24/7, with direct telephone and email contact available to residents.

Given the length and complexity of the construction period, affected residents need access to a clearly identified point of contact who can respond promptly to issues as they arise.

Past construction projects in Wickham have demonstrated the significant disruption and damage to the Village infrastructure that such large developments impose on the surrounding area. Residents have experienced prolonged traffic delays due to inadequate traffic management within the suburb's constrained one-way street network, excessive noise from works outside

approved construction hours, and safety concerns about debris and construction materials left on public roads, including incidents that have resulted in vehicle damage home damage.

To ensure transparency and public confidence, the project should also fund an Independent Compliance Officer or certifier to receive, investigate, and respond to community complaints throughout the lengthy construction phase.

Reliance on complaint processes managed solely by the developer provides limited assurance that concerns will be assessed objectively. Given that this would be the largest building ever constructed within the Newcastle Local Government Area, independent oversight and a robust community accountability framework should be mandatory components of any approval.

Inadequate Assessment and Disclosure of Acid Sulphate Soil Risks The site at 10 Dangar Street is identified in the NSW eSPADE mapping system as an H2 acid sulphate soil area, indicating a high probability of acid sulphate soils at depths of 1 to 3 metres below ground level. Given the depth of excavation required for this development, disturbance of these soils is highly likely. Despite this known environmental risk, the publicly exhibited documentation provides limited information regarding how acid sulphate soils will be identified, managed, treated, monitored, or disposed of during construction. When exposed to air, acid sulphate soils can generate sulphuric acid, mobilise heavy metals, contaminate waterways, damage infrastructure, and cause significant ecological harm. These risks are particularly relevant given the site's proximity to Throsby Creek and the surrounding estuarine environment. Observations around the site perimeter indicate areas of brown-orange staining on exposed surfaces, potentially consistent with iron oxide deposits commonly associated with oxidised acid sulphate soils. While not conclusive evidence, these observations reinforce the need for greater transparency regarding site investigations and environmental management measures. Given the environmental sensitivity of the Throsby Creek catchment, the community should be provided with clear, detailed information on groundwater management, dewatering activities, runoff controls, soil treatment procedures, and measures to prevent off-site environmental impacts. The absence of a comprehensive, publicly accessible acid sulphate soil management strategy is concerning for this scale of development. Note Reports have been to the EPA and Newcastle Council about concerns of Sulphates.

Approval should not be granted until a detailed management framework and independent assessment demonstrate that potential risks to surrounding ecosystems, waterways, infrastructure, and the local community can be effectively mitigated.

Potentially Misleading Visualisations and Landscape Representations The visual material exhibited as part of the proposal appears to minimise the true scale and visual impact of the development by using unrealistic conceptual landscaping and representations that do not accurately reflect existing site conditions.

For a project of this magnitude, the community should be provided with species that realistically depict the completed development and its relationship with the surrounding urban environment. Sheet DA-2502 illustrates mature trees of a size and canopy spread that are unlikely to be achieved within Wickham as the soils are badly polluted.

The locality is characterised by constrained growing conditions, including a history of industrial land use, limited soil volumes, wind tunnel exposure, masses of bitumen and concrete, overshadowing, and long- term challenging establishment conditions.

Existing street trees throughout Wickham died on mass, including along Hannell, Railway Street and Dangar Street, Grey Street demonstrate the difficulty of sustaining large canopy vegetation and usually die throughout the entire precinct. The prominent placement of oversized trees throughout the render visually screens the podium, reducing the perceived bulk of the development is misleading. N.B. Most trees die, caused by wind exposure and pollution.

Similar concerns arise with Sheet DA-2503, which depicts the Newcastle Interchange and the surrounding public domain in a manner that does not appear to accurately reflect existing conditions.

Elements of the interchange appear visually enclosed despite the open character of the space beyond the ticketing area. This alters the perceived scale relationship between the proposed tower and its surroundings, diminishing the building's apparent dominance within the streetscape.

Once again, extensive mature landscaping is used to soften the building's massing, despite there being limited evidence that vegetation of this scale could realistically be established or maintained on the site. The repeated reliance on oversized vegetation and modified contextual elements raises concerns regarding the accuracy and reliability of the visual material presented for public assessment.

Visualisations prepared for exhibition should provide a realistic representation of the likely built outcome rather than relying on idealised, leafy-green landscape treatments to reduce the apparent scale and impact of the development. Given that this proposal would result in the tallest building in Newcastle QUAYS, Hunter Street, West End Newcastle, the public should be able to assess the project accurately, with appropriate vegetation conditions represented.

Conclusion The proposed SSD at 10 Dangar Street represents a major departure from the planning principles that have guided Newcastle's development for decades.

The proposal undermines:

- established LEP and DCP intent,
- Newcastle's strategic planning vision,
- infrastructure coordination principles,
- emergency management capability,
- and the character and liveability of the Wickham and Honeysuckle precincts. The development raises serious unresolved concerns regarding:
- emergency access, • evacuation,
- firefighting capability,
- infrastructure capacity,
- traffic congestion,
- urban character,
- planning integrity,
- and public benefit.

Please request that the proposal be subjected to rigorous independent scrutiny, including:

- independent traffic and evacuation assessment;
- independent emergency services review;
- infrastructure capacity review;
- cumulative impact assessment;
- and independent urban design analysis.
- Do not ignore local government work and standards for social housing standards.

The current proposal ignores. This proposal must Adopt and align with Lower Hunter Regional quota for Social Housing and Affordable housing that local government already have in place.

- The long-term integrity, safety, and liveability of Newcastle Quays, Newcastle's West End and CBD of now Interchange should not be compromised by excessive uplift that disregards the strategic planning foundations established over many decades

To strengthen the planning arguments, and maintained State Significant Development objection. I have also grouped in summary related issues together in planning concerns, to infrastructure and public benefit, then safety, with environmental and governance issues, relate in concluding with requested actions.

1. Excessive Height and Scale Contrary to Established Planning Controls

The site forms part of the Honeysuckle Stage 2. Wickham Masterplan area, a framework developed through extensive consultation involving the community, City of Newcastle staff and elected councillors for "line of site" to 2040..

The HCCDC Honeysuckle and Newcastle Quays West End and Wickham Masterplan permits an increase in building height from 45 metres to 60 metres where developers provide additional Community Benefits and infrastructure access improvements.

The current proposal seeks a scale that significantly exceeds these established controls.

The application seeks a height rezoning to 117 metres, however the submitted architectural documentation indicates a 43-storey tower with a Reduced Level (RL) of approximately 152 metres, resulting in an overall building height estimated between 145 and 150 metres.

This represents:

- approximately 250% of the original 45-metre height limit;
- approximately 150% of the Wickham Masterplan height limit of 60 metres; and
- a scale that is substantially beyond the intended planning framework for the precinct.

Under the HDA pathway, a development providing 15% affordable housing for 15 years may be eligible for a 30% uplift in development standards. Even if the maximum affordable housing bonus were applied, the resulting height would be approximately 78 metres.

The proposed tower far exceeds this benchmark.

While incentives for affordable housing are supported, affordable housing commitments should be secured in perpetuity rather than for a limited period. Furthermore, the proposal makes no clear reference to Newcastle Council's Affordable Housing Contribution requirements, which seek the ongoing delivery of affordable housing outcomes for the community.

2. Departure from Established NSW Planning Frameworks

For decades, NSW planning has operated through an integrated hierarchy of planning instruments, including:

- Regional Plans;
- State Environmental Planning Policies (SEPPs);
- Local Environmental Plans (LEPs);
- Development Control Plans (DCPs);
- Strategic transport planning;
- Infrastructure coordination frameworks;
- Public domain strategies; and
- Urban design controls.
- Community Benefit Agreements

These frameworks did exist to provide certainty, consistency, transparency and orderly growth.

Approval of this proposal would undermine the intent of those planning instruments by permitting a scale of development substantially beyond the strategic vision established for Newcastle Keys, Newcastle's West End, Wickham Park boundary and Master Plan.

Planning controls only maintain legitimacy when they are applied consistently and transparently.

3. Impacts on Newcastle West End, Wickham and Honeysuckle Character

The Wickham and Honeysuckle precincts were never intended to become isolated ultra-high-rise excessive tower precincts, detached from surrounding urban form and infrastructure capacity.

The Newcastle renewal strategy sought to deliver:

- mixed-use activation;
- walkability;
- medium-to-high density development with appropriate transition;
- employment growth;
- public waterfront access;
- integrated transport outcomes;
- compatible built form;
- fine-grain streetscapes; and
- liveable cohesive urban neighbourhoods.

The proposed tower would overwhelm the established urban grain and visual hierarchy of the precinct.

Potential impacts include:

- visual dominance over surrounding development;
- overshadowing of public spaces and neighbouring properties;
- erosion of the human-scale character of Wickham;
- disruption of planned transitions between heritage, residential, rail and waterfront precincts;
- diminished visual coherence of the Newcastle peninsula; and
- creation of a precedent for further uncontrolled tower escalation throughout the West End.

4. Failure to Deliver Proportionate Community Infrastructure and Public Domain Improvements

The proposal seeks substantial increases in both building height and gross floor area while offering limited community infrastructure in return.

The development will significantly increase pedestrian, cyclist and transport demand around Newcastle Interchange and surrounding streets. Despite this, the proposal does not provide meaningful upgrades to the surrounding public domain.

The exhibited plans is dropped in on the old damaged existing public domain / infrastructure along Dangar Street, Charles Street, and Hannell Street it will simply be retained.

This is unacceptable for a development of this scale.

Existing footpaths and public infrastructure within the precinct already require urgent upgrading and renewal.

The proposal fails to provide:

- substantial public domain improvements;
- major road upgrades;
- transport capacity improvements; only to destroy what is remaining with over sized truck movements with building materials.
- additional public open space;
- emergency access upgrades;
- community facilities; or
- utility infrastructure augmentation proportional to the scale of development.
- Segregation from the local area as the building has various entrances for access keeping people separate and compounded by excessive in form, while overwhelming the fine grain of the suburb.

The publicly accessible plazas and through-site links proposed within the development should not be considered community incentive infrastructure.

These spaces are the minimum expected design response for a development adjoining a major transport interchange. They remain under private ownership and control and may be altered or repurposed in the future.

The proposal therefore fails to demonstrate compliance with the intent of the City of Newcastle's Community Infrastructure Incentives Policy and the Wickham Community Infrastructure framework, both of which seek infrastructure delivery proportional to the planning uplift granted.

5. Planning Integrity and Erosion of LEP Intent

The proposal reflects a broader trend whereby planning controls are increasingly overridden under the justification of accelerated housing delivery.

If approved, the development would:

- undermine established LEP height and floor space controls;

- weaken DCP built-form guidance;
- reduce confidence in planning law;
- create uncertainty regarding future assessments; and
- establish a precedent for similar departures elsewhere within Newcastle.
- HCCDC “Newcastle Quays” will stand insignificant in context.

Where development substantially exceeds intended planning controls without corresponding public benefit or infrastructure investment, the integrity of the planning framework itself becomes completely compromised.

6. Emergency Access, Evacuation and Public Safety Concerns

The proposal fails to adequately address the physical limitations of the Newcastle peninsula road network.

Surrounding streets, including Hannell Street, Bishopsgate Street, Union Street, Railway Street and adjoining laneways, were established in the late nineteenth and early twentieth centuries and were never designed to support the population intensity generated by a 43-storey tower.

Serious concerns include:

- restricted emergency vehicle access;
- limited evacuation capacity;
- traffic bottlenecks during emergencies;
- constrained manoeuvring space for fire appliances;
- insufficient staging areas for emergency operations;
- increased congestion around Newcastle Interchange; and
- cumulative pressure on the peninsula road network.

Independent assessment of emergency access and evacuation arrangements is required.

7. Lessons from the 2007 Pasha Bulker Disaster

The 2007 Pasha Bulker storm event demonstrated the vulnerability of Newcastle's transport and emergency access networks.

During that event:

- movement throughout Wickham, Honeysuckle and the CBD became severely constrained;
- emergency response operations experienced delays;
- sections of the city became effectively isolated; and
- transport routes experienced significant disruption.

The proposal intensifies existing vulnerabilities by concentrating additional population within a constrained peninsula environment.

Questions remain regarding how emergency evacuation, fire response, police operations, ambulance access, SES coordination and resident movement would function during major storm events, flooding, infrastructure failures, hazardous material incidents or large-scale fires.

8. High-Rise Fire Safety Concerns

The proposed tower raises significant unresolved questions regarding fire safety and emergency response capability.

Issues requiring clarification include:

- the operational capacity of local Fire and Rescue NSW resources;
- aerial appliance reach limitations;
- evacuation timeframes for hundreds of occupants;
- smoke management systems;
- emergency refuge arrangements;
- stairwell capacity;
- firefighting water supply;
- water pressure and storage capacity; and
- emergency access constraints associated with surrounding streets.

The proposal should not proceed without independent verification that emergency services and supporting infrastructure can adequately service a building of this scale.

9. Construction Management and Community Accountability

If approved, a development of this magnitude should be subject to enhanced community oversight throughout the construction phase.

Past construction projects within Wickham have generated significant disruption, including:

- traffic congestion;
- inadequate traffic management;
- excessive construction noise;
- works occurring outside approved hours;
- debris on public roads; and
- damage to neighbouring property and vehicles.

The applicant should be required to establish:

- a dedicated 24-hour community liaison office;
- direct telephone and email contact for residents;
- regular public reporting on construction impacts; and
- an independently funded compliance officer or certifier to investigate community complaints.
- Contract double boggies/ haulage of material to the site, to pay for damages to the homes and vehicles that are in the narrow lanes on route to 10 Dangar.

Independent oversight is essential given the scale and duration of the project.

10. Acid Sulphate Soil Risks

The site is identified within NSW eSPADE mapping as an H2 Acid Sulphate Soil area, indicating a high probability of acid sulphate soils occurring at depths between one and three metres below ground level.

Given the likely excavation depth required for the development, disturbance of these soils appears highly probable.

The exhibited documentation provides insufficient detail regarding:

- identification and testing procedures;
- treatment and disposal methods;
- groundwater management;
- dewatering activities;
- environmental monitoring; and
- mitigation measures to protect nearby waterways.

Given the site's proximity to Throsby Creek and the surrounding estuarine environment, a detailed and independently reviewed Acid Sulphate Soil Management Plan should be required prior to any approval.

11. Proposal offers Concepts only.

The idealist concepts exhibited as part of the proposal appears to fail the development's excessive scale through the use of imagery landscaping and basic imaging.

Concepts show mature trees and growth, of a size and canopy spread unlikely to be achieved within Wickham's constrained polluted soils.

& the excess building bulk and induced wind tunnels will never support growth of any Trees.

While the image of the Newcastle Interchange and surrounding public domain appear are altered in scale and openness.

Given that this proposal would create excessive structural form in Newcastle, imagery and fact should depict truthful conditions, rather than relying upon inappropriate impossible landscaping treatments to beautify the building's "Cathedral Leaning Pisa" appearance.

12. Bulky Goods Storage

The inclusion of bulky goods storage is supported and should be recognised as an important component of residential development.

However, recent apartment developments within Wickham have consistently underprovided storage facilities.

The proposed storage area of 52.3 square metres appears potentially inadequate and should be independently assessed against the NSW EPA Better Practice Guide for Resource Recovery in Residential Developments.

The applicant should demonstrate that storage provision complies with contemporary best-practice standards and adequately accommodates the needs of residents.

13. Strategic Precedent for Newcastle

Approval of this proposal would establish a significant precedent for future development across the Newcastle peninsula.

Potential consequences include:

- excessive cumulative overdevelopment along the peninsula;
- infrastructure overload and damage by excess service requirement to the tiny site;
- erosion of urban character and social cohesion of a regional community;
- reduced confidence in planning law; and
- long-term planning instability.

The Newcastle West End should continue to evolve through coordinated strategic planning rather than isolated approvals that fundamentally exceed the intent of adopted planning controls.

Conclusion Once again the proposed SSD at 10 Dangar on Hannell Street represents a substantial departure from the planning principles that have guided Newcastle's development for decades & into the future.

The proposal undermines:

- established LEP and DCP intent;
- Newcastle's strategic planning vision 2040 and beyond;
- infrastructure coordination principles;
- public safety considerations; and
- the character and liveability of the Wickham and Honeysuckle precincts.

Serious unresolved concerns remain regarding:

- building height and scale;
- infrastructure capacity;
- public benefit;
- emergency access and evacuation;
- firefighting capability;
- traffic impacts;
- environmental risks;
- planning integrity; and
- long-term precedent effects.

Accordingly, I respectfully request that the proposal be refused, or alternatively be subjected to rigorous independent review including:

- independent traffic and evacuation assessment;
- independent emergency services review;
- infrastructure capacity assessment;
- cumulative impact assessment;

- independent urban design review;
- public domain and community infrastructure review;
- acid sulphate soil assessment; and
- affordable and social housing compliance review.
- Damage to the Village from the years of Construction and truck movements
- An old coal mine cavity on Hannell Artery at the site.

The site has constant Newcastle Harbour flooding into - 10 Dangar – on Hannell Street, that does have mine subsidence concerns ie next to the old mine cavity, adjoining the old mine i.e. is under Hannell Street and Interchange Rail Shed. (there concerns for what maybe a Tower with flawed foundations for **another leaning tower**).

The world already has “ Leaning tower of Pisa Cathedral ”

The long-term safety, integrity and liveability of Wickham Urban Village, Newcastle Quays, Newcastle CBD corridor, Newcastle Residential Peninsula, Newcastle's West End and Hamilton and Lower Hunter planning should not be compromised by excessive planning uplift that disregards the strategic planning foundations established until 2040 and beyond.