



5 November 2025

2210627

Anna Nowland
A/ Team Leader
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Anna,

Response to Request for Information – SSD 49295711 MOD 7 Harbourside Shopping Centre Redevelopment – Substation Plant

This letter has been prepared by Ethos Urban on behalf of Mirvac Retail Sub SPV Pty Ltd (Mircac) in response to the Request for Information received from the Department of Planning, Housing, and Infrastructure (DPHI) on 23 October 2025.

It should be read in conjunction with the following:

- Amended Ground Level Plan prepared by Snohetta + Hassell (**Attachment A**).
- Hazardous Chemical Statement prepared by Arup (**Attachment B**).
- Substation Servicing and Access Statement prepared by DEP (**Attachment C**).

A detailed response to each comment received from DPHI and the City of Sydney (Council) is provided in the table over the page.

We trust that the information provided is sufficient to enable determination of the Modification Application. Feel free to contact the undersigned should you require any further information.

Yours sincerely,

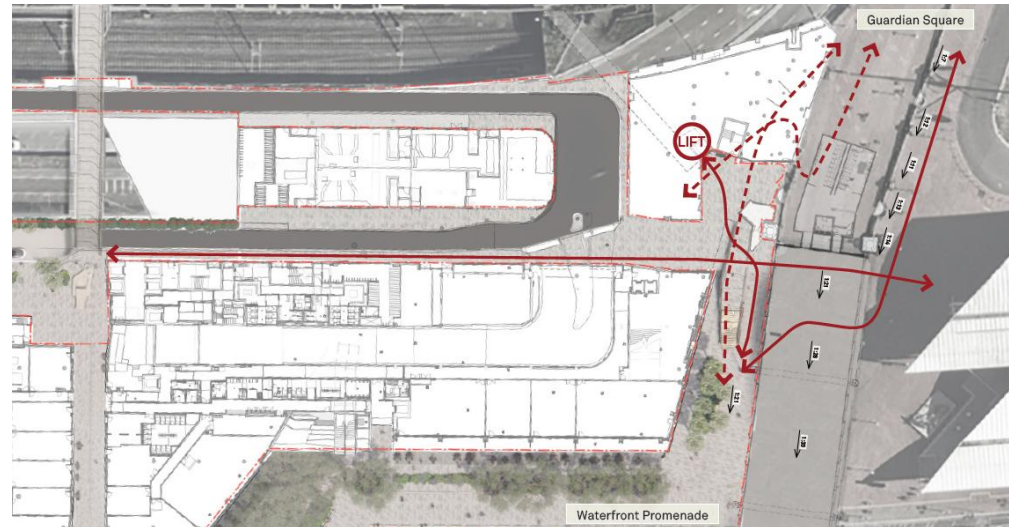
Jacob Dwyer
Associate Director
jdwyer@ethosurban.com

Item	Response
Department of Planning, Housing and Infrastructure	
Pedestrian access and servicing	

Amend the design of the fire hoods to enable pedestrian movements along both the west and east Darling Drive slip lane, noting the proposed hood walls would impede the public footpath and would require pedestrians to enter the road. The proposed design also creates concealment opportunities between Substation 2 and Substation 3's hood walls.

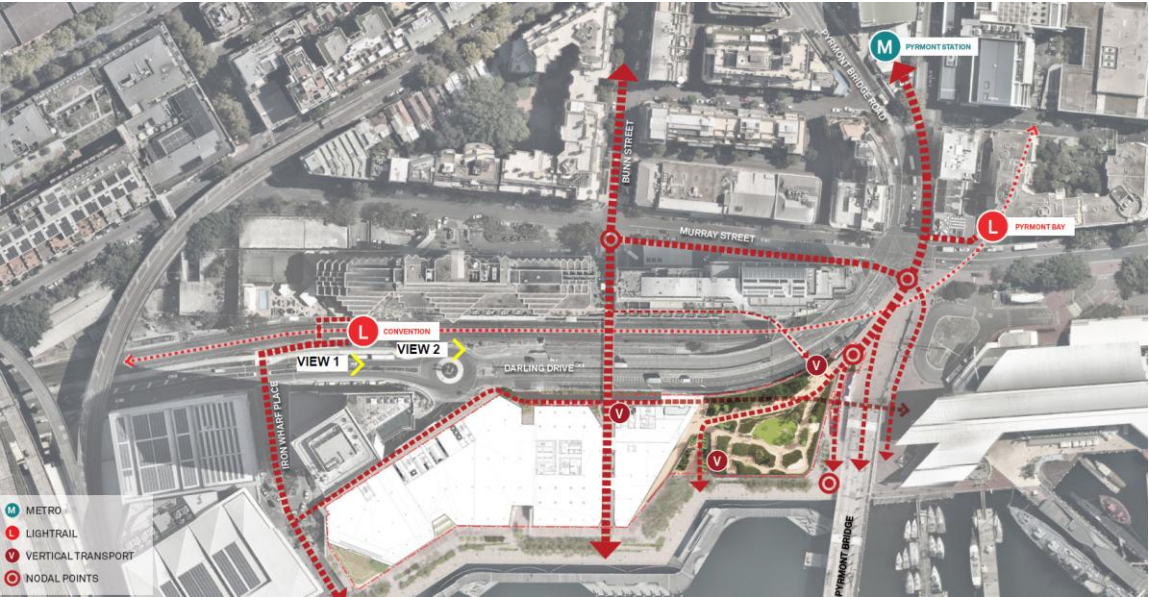
The area adjacent to substations 2 and 3 is not intended for pedestrian use, as there are no desire lines or pedestrian infrastructure that would direct pedestrians into this area. The area is intended as a back-of-house servicing laneway, with access generally only required for maintenance and servicing personnel.

As shown below, for pedestrians coming from the north, the desire lines generally do not draw people south into the site, with pedestrians generally staying in the north connecting between Pyrmont Bridge/Waterfront Garden and the Waterfront Promenade. For those that do walk south, the footpath on the eastern side of the Darling Drive slip lane is wide and has been designed to accommodate pedestrian movement.



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For pedestrians potentially entering the Darling Drive slip lane from Darling Drive to the south of the site, this is extremely unlikely. As shown below, the main pedestrian desire lines will utilise other connections being delivered as part of the project, such as the Bunn Street Bridge, Waterfront Steps or the Pyrmont Bridge Steps.



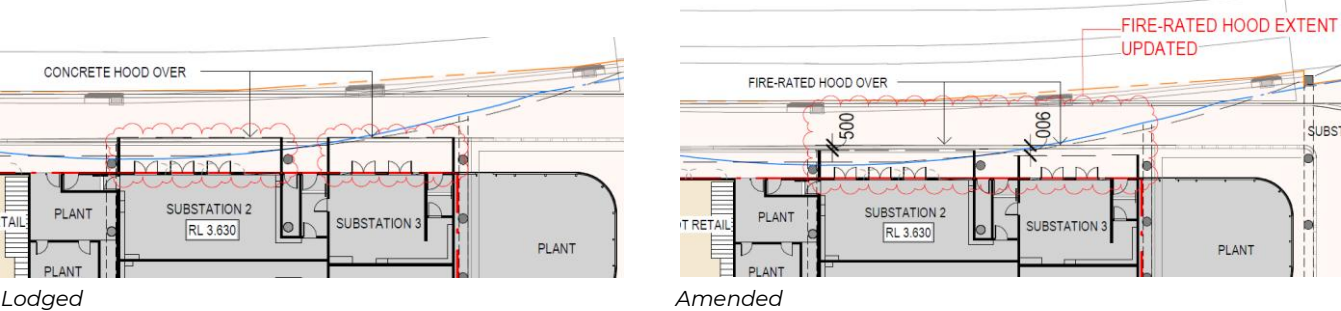
If a pedestrian was walking north bound along Darling Drive, they would not feasibly enter the slip lane, since the pedestrian footpath ends before the roundabout and does not continue into the Harbourside site.



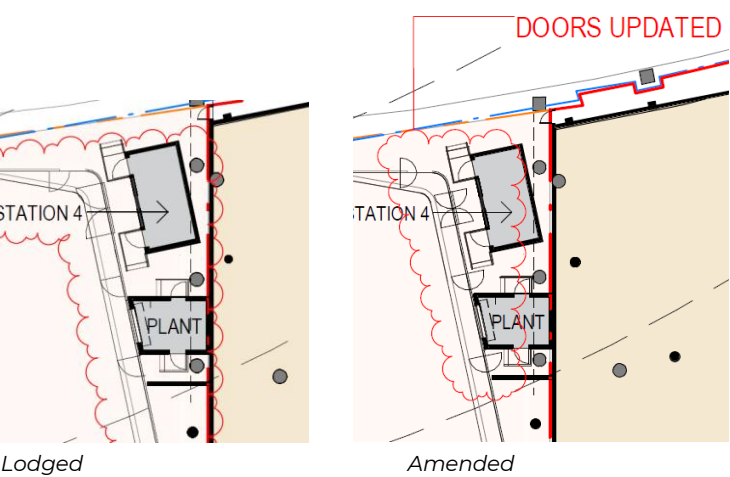
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For the reasons above, it is considered extremely unlikely that pedestrians would be using the area adjacent to Substation 2 and 3, except for maintenance and servicing of the plant equipment.

Notwithstanding the above, the extent of the fire protection hoods for substation 2 and 3 has been minimised as much as possible, while still remaining compliant. The hoods now provide a clearance of 500mm in front of substation 2 and 900mm in front of substation 3 from the edge of the slip lane. This provides sufficient space for manoeuvring around the hoods without entering onto the road, if required, and also provides better sightlines and less opportunities for concealment. See below comparison of the as-lodged (left) and amended (right) design (also at **Attachment A**).

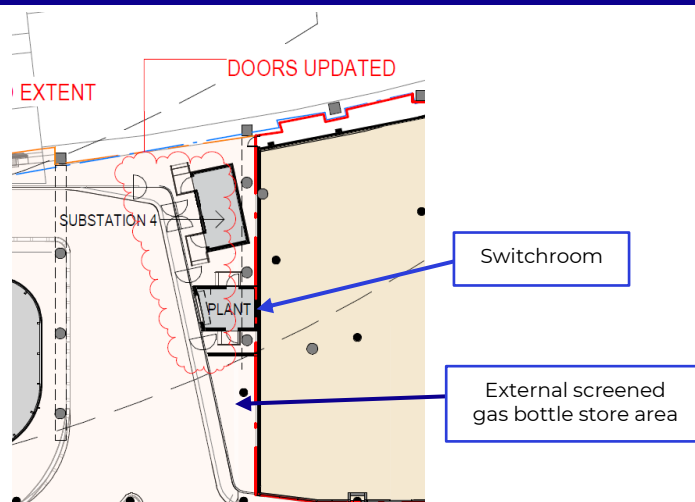


Amend the design of Substation 4's access doors to not open onto the public road.	The design of Substation 4's access doors has been amended so that they do not open onto the slip lane. See below comparison of lodged (left) and amended (right) configuration. An updated Ground Level Plan is provided at Attachment A showing the amended configuration.
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Item	Response
<i>Clarify how servicing would be undertaken noting there is limited space for vehicle parking</i>	The servicing arrangements for Substation 4 will be similar to the arrangements for the approved Substation 1, 2 and 3. Servicing of the substations will be undertaken by Ausgrid-authorized personnel as part of their routine maintenance program. For typical activities such as inspections, testing or minor equipment servicing, dedicated parking adjacent to the substations is not required. Service vehicle parking will be organised with the Harbourside Operations Management team, and parking for Maintenance Staff can be organised in the Basement Loading Dock as required. In the event of a transformer replacement or major equipment upgrade, access will be required for heavy vehicles, consistent with standard practice at similar urban sites. These activities are infrequent and will be coordinated with the building management team to ensure safe and efficient access, with appropriate traffic and pedestrian management arrangements in place. The above is confirmed in the Substation Design and Servicing Statement prepared by DEP Consulting at Attachment C.
Gas bottle storage	
<i>Clarify the use of the plant room next to Substation 4, noting the submitted Design Report proposes use of the space as gas-bottle storage rather than as plant space.</i>	The space next to Substation 4 and Switch room is proposed to be a gas-bottle store. The design of this gas bottle storage is assessed against the requirements of Australian Standard AS 1596:2014 <i>The Storage and Handling of LP Gas</i>. The store will be a fenced area with access control and meets the requirement of separation distances to public and protected places. The bottles are intended for occasional use by commercial tenants for portable heaters and will not be used to service any of the base-building elements (which are gas-free). The proposed storage area has been reviewed by dangerous goods consultant Arup, with detail provided at Attachment B.
<i>Confirm the type and quantity of gas being stored in this location, e.g., LPG (Liquid Petroleum Gas), propane, butane, etc.</i>	The stored gas will be Liquefied Petroleum Gas (LPG) and classified as Class 2.1 flammable gas under the Australian Dangerous Goods (ADG) Code. The total quantity of LPG stored at site will be 3197 Water Litre (WL), in 9kg (23L) sized individual bottles (standard BBQ style bottles).
<i>Provide additional information on the storage and handling procedures being implemented for storing gas canisters with reference to Fire and Rescue NSW's LPG Cylinder Safety Check List and Portable Outdoor Gas Heater's fact sheet.</i>	The proposed storage area and ongoing handling procedures have been reviewed by dangerous goods consultant Arup, with detail provided at Attachment B. Placards will be used to label the store and indicate the class of gas stored, as required by WHS Regulations. The operator of the premises will develop storage and handling procedures for gas canisters using Safety Data Sheet (SDS), NSW LPG Cylinder Safety Check List as required by Chapter 7, Part 7.1, Division 5 of WHS Regulations.
Gross floor area	
<i>Confirm whether there are any changes to gross floor area noting the repositioning of the facade line and the use of a plant space as above-ground storage.</i>	For clarification, the area labelled as "plant" is a switchboard. Both this and the Substation 4 room are considered plant/building servicing and therefore do not count towards GFA. The gas bottle store area is not fully enclosed and therefore does not count towards GFA either. Notwithstanding the façade re-alignment at Level 2, the development continues to comply with the maximum GFAs specified in the consent.

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City of Sydney

1. Fire hoods and pedestrian access

It is understood that the proposed fire hoods to substations 1 -3 are required to meet Ausgrid requirements for fire protection. It is unclear if the location of the proposed substation hoods is able to be accessed by pedestrians. Where accessible, the proposed full width hoods would obstruct pedestrian movements and create a safety issue whereby persons walking along the footpath would have to step onto the roadway to navigate around the hoods.

Please refer to the response to DPHI's Pedestrian Access and Servicing RFI in line 1 of this table for a detailed response.

It is also not clear how access to the substations will occur for servicing. Vehicles parked immediately adjacent would block all vehicle movements. It is recommended that the hoods be set back from the roadway where possible for pedestrian safety and to prevent impacts from moving vehicles, particularly wing mirrors and other obstructions.

Please refer to the response to DPHI's Pedestrian Access and Servicing RFI in line 1 and 2 of this table for a detailed response.

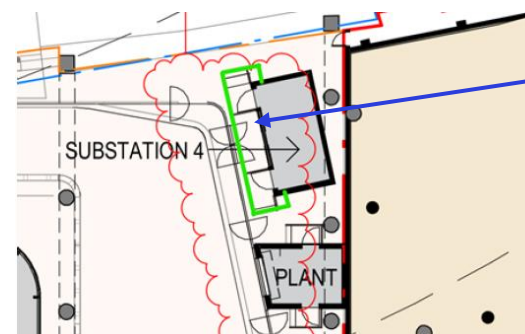
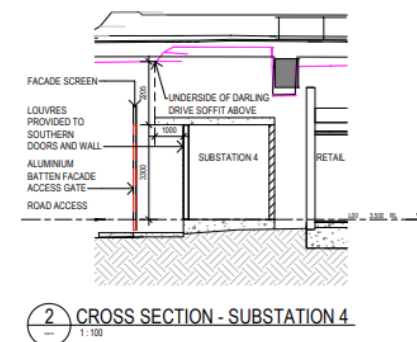
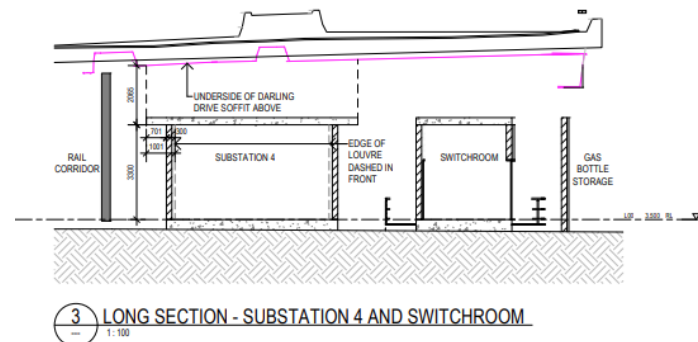
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2. Substation 4

Fire hood

Clarification should be sought as to whether a fire protection hood is required for Substation 4 and where it will be located. There is concern that where required, the hood may overhang the access road.

As detailed in the Substation Servicing and Access Statement at **Attachment C**, the Substation 4 design incorporates the required fire protection within the substation structure, including an integrated slab awning. It therefore does not require the same external hoods as Substations 1-3. Refer below for indicative section drawings of substation 4.



Indicative extent of slab roof shown in plan

Swing doors

The proposed double swing doors to Substation 4 encroach into the roadway. It is suggested that doors opening into the roadway be limited/consolidated where possible. It is recommended a management strategy is developed for when doors are in operation.

The design of Substation 4's access doors has been amended so that they do not open onto the slip lane. A comparison of the lodged and amended configuration is provided in the response to DPHI's Pedestrian Access and Servicing RFI in line 3 of this table.

An updated Ground Level Plan is provided at **Attachment A** showing the amended configuration.