

25 May 2018

Your ref:
Our ref: HXWM/DXPM/5658267

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Fishermans Bend Planning Review Panel
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Attention: Ms Kathy Mitchell, Chair

Dear Ms Mitchell

**Fishermans Bend Planning Review Panel – APN DF2 Project 1 Pty Ltd (Submitter No. 157)
277-281 Ingles Street, Port Melbourne (Site)**

We continue to act for APN DF2 Project 1 Pty Ltd (**APN**) in relation to the Fishermans Bend Planning Review Panel Hearing.

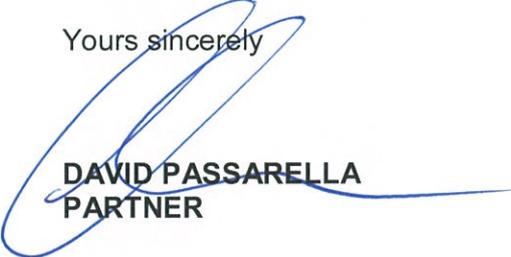
We refer to our previous letter dated 27 April 2018 in which we advised that APN no longer wished to participate in the proceeding.

Our client has instructed us that an opportunity for the redevelopment of the Site has recently arisen. Accordingly, we enclose further submissions from APN in relation to the Site.

We note that the Panel Hearing is now scheduled to continue until at least the week of 18 June 2018. In these circumstances, we respectfully request that the Panel takes APN's further submissions into consideration when making its recommendations to the Minister for Planning.

If you have any questions or require further information please do not hesitate to contact David Passarella on +61 3 8568 9527 or dpassarella@millsOakley.com.au

Yours sincerely


DAVID PASSARELLA
PARTNER

APN | Property Group

24 May 2018

Planning Panels Victoria
1 Spring Street
MELBOURNE VIC 3000

Dear Sir/Madam,

PLANNING SCHEME AMENDMENT GC81 – 277-281 INGLES STREET, PORT MELBOURNE

APN DF2 Project 1 Pty Ltd (APN) own 277-281 Ingles Street (the Site), Port Melbourne and writes to lodge a further submission to proposed Planning Scheme Amendment GC81. Although previously expressing that we had no further submissions to the Panel, an exciting opportunity has recently come to light and we respectfully request that the submission outlined in this letter be taken into consideration.

Currently, planning approval is sought for a mixed use development, comprising 4 residential towers (PA1500020). We wish to express an alternative opportunity for the development of the Site, however this is not to prejudice the existing planning application.

We wish to advise that there has been serious interest in the Site for the redevelopment of the land for a state-of-the-art data centre. This would be a large-scale operation, housing computer systems and associated components, generally used by organisations for the remote storage, processing and/or distribution of data. We consider this would be a desirable use and development that would contribute positively to the future character of the Sandridge Precinct.

There are limited opportunities within the Precinct for such a use to be located. To enable the built form required for the data centre, a large, generally unencumbered site is required. The Site benefits from two street frontages and comprises a number of lots, which provides a scale that can comfortably accommodate the data centre.

Future development for a data centre would need to be designed having regard to specific commercial and operational requirements. We have been advised that there are a number of matters proposed via Amendment GC81 that would make the future development of a data centre on the Site unviable. These are outlined below.

First, the proposed road infrastructure traversing the Site would mean that a large-scale building required by a state-of-the-art data centre would not be feasible. The proposed mandatory 22 metre through-road, 12 metre road and two indicative laneway connections would prejudice the built form outcome required. In the Statement to Fishermans Bend Planning Review Panel dated 10 April 2018 prepared by Jason Walsh, it is suggested that there be flexibility in the location for delivery of the proposed new road and laneways and that they do not need to be regimented or prescribed at this time.

The potential development opportunity for a data centre adds weight to the benefit of flexibility in the delivery of the road infrastructure. The relocation of the new road, potentially to the periphery of the Site rather than through the middle, would enable a large and consolidated area of the Site to be developed. This would not only achieve the intent of the through-link between Ingles Street and Bertie Street but would maintain the development potential of the Site for large-scale built form.

Second, the nomination of Bertie Street and the interface with internal roads and open space as 'secondary active frontages' poses further constraints on development. Commercial warehouse-type development, such as the potential development of a data centre, while actively encouraged in the Sandridge Precinct, has limited opportunity to provide active frontages.

In light of this recent opportunity, we consider it would be detrimental for Fishermans Bend if a large commercial tenant was not able to "buy in" to the area due to the development limitations that may arise as a result of the suite of planning controls proposed.

We request that the proposed provision of the roads and laneways on the Site, as well as open space and active frontage requirements, be given careful reconsideration in this regard.

We consider the potential for a large-scale data centre to relocate to the Site to be an exciting opportunity that should be encouraged and facilitated through the planning controls. While we note that this is an opportunity that we would like to pursue, we reserve the rights to continue with the current planning application for the site under PA1500020.

We apologise for raising these matters at such a late stage of the process, however, this opportunity has only recently arisen.

We request the Panel has regard to the matters raised in this letter as part of the recommendations it makes to the Minister on Amendment GC81.

Yours sincerely,



Tim Slattery
Chief Executive Officer
APN Property Group Limited