

Darebin City Council Submission to VPA Proposed Preston Market Precinct Framework

Council is deeply committed to the protection of Preston Market, particularly its heritage, identity and role as a gathering space and source of affordable fresh produce for our community. We have heard first-hand, from residents, traders and visitors, of the importance of this market in their daily lives. It is this commitment that has driven Council's efforts in recent years to influence the VPA's plans for the site.

Council submits that the proposed framework fundamentally fails to protect the social, economic or cultural functions of the market and poses an existential threat to Preston Market. The planning framework expresses values that are not aligned with those of market users and the broader community and shows little understanding of how the market functions or how it generates value for its community.

The proposed framework scores poorly against the criteria in Council's Heart of Preston, which was established by Council following four rounds of community engagement and technical studies. Many of these criteria are reflected in the structure plan, yet poorly implemented through the planning controls.

Already, over 5,500 community members have signed Council's petition requesting that the Market be adequately protected, and not demolished and rebuilt in another location. VPA have demonstrated through these proposed plans that they have failed to listen to the what the community wants.

The proposed development density and heights fail to achieve best practice principles of urban design and pave the way for an insensitive overdevelopment of the site that is not commensurate with actual housing need.

While there are positive aspects to the planning framework, like elevated environmentally sustainable design standards and the mandatory requirement for affordable housing, Council submits that they could go further still.

It is Council's view that the development assumptions underlying the proposed framework plan are flawed and substantial changes are required to meet good heritage and urban design practice. Council submits that the plans should be changed, and further engagement undertaken, before proceeding with the planning scheme amendment.

This document contains the key points that will form the basis of Council's submission to the VPA public consultation.

Market Heritage & Identity

Council Objective

Following redevelopment, the market retains its unique feel of covered streets, intersections, sheds, stalls and small shops that create a place of welcome, exchange and diversity; which would require the following key elements... (Heart of Preston, Objective 1)

Submission Request 1 – Strengthen the planning controls to protect market heritage and identity

- Stronger minimum market size controls including the market is at least the same size (including service areas + 1700m²) and a similar number, mix and size of stalls.
- Stronger heritage controls to allow only minimal change to the market, and change the framework plan and heritage guidelines to retain:
 - original parts of the market (including original sheds);
 - current market location and footprint;
 - the heritage space frame roof and tilt-up concrete walls;
 - the sunlit, open and airy feel; and,
 - two cruciform intersections which serve as important community focal points.
- Council's position is to retain the market where it is and preserve its heritage fabric. Where parts of market must be rebuilt, include stronger controls to protect the identity, amenity, access to daylight and airy feel of the market, specifically:
 - includes design guidelines for market within zone controls, not just within the structure plan;
 - guide the design of new market streets and public spaces that enable the same social function as current cruciform intersections;
 - prohibit vehicular access along market streets;
 - prohibit tall buildings over the market. The market cannot be replaced with a generic urban typology that has few streets, private walkways, large blocks, large podium buildings, large titles, and a single owner;
 - require public walkways to be at least 12m wide, covered with clear canopies, no narrow aisles within a building. Ensure that market streets and open space remain as public spaces; and
 - avoid shopping centre or mall style of market design.
- Demolishing the market by 80% is an unacceptable heritage outcome that has no clear rationale and would decimate the heritage significance of Preston Market. It would also harm the social and cultural roles of the market, along with its continuity and commercial viability.
- Ensure that the amount of market car parking is maintained and appropriately located:
 - Incorporate Structure Plan Action 26 'Maintain at least the same number of car parking spaces as currently provided for the existing market' into the zone as a mandatory requirement.
 - Change from a discretionary to a mandatory requirement in the zone that car parking must be located underground, where possible. Where this is not technically possible parking must be located above ground level and sleeved with active uses.

Market Traders & Operation

Council Objective

The vibrant mix of traders, particularly those from diverse backgrounds, are supported before, during and after redevelopment to keep the market accessible, affordable and multicultural; which would require the following key elements (Heart of Preston, Objective 2)

Submission Request 2 – Reinstate the Charter of Community Expectations to protect current traders and to keep the market accessible, affordable and multicultural.

- Reinstate a Charter of Community Expectations with the landowner/developer to ensure they commit to:
 - security and affordability for existing traders;
 - rental adjustments for traders where trading is disrupted by development;
 - retaining a diversity of independent businesses;
 - no franchises/chains; and
 - meaningfully involve migrant communities in precinct design and creation of new open spaces.
- Require the developer enter into a s173 agreement with Council, committing to the market diversity and affordability requirements in the Charter of Community Expectations. This must be entered into before a planning scheme amendment is gazetted.
- Strengthen the Market Continuity and Transition Plan application requirement to demonstrate how the market will be managed effectively during and after redevelopment. This includes measures to minimise disruption to trading, and to provide a clean, safe and pleasant environment for traders and shoppers.

Sustainability, Housing & Design

Council Objective

Surrounding precinct is developed as a model of a sustainable, liveable neighbourhood with world class architecture, open spaces, streetscapes, public areas and urban design that tell the stories of the migrant communities that have made this place what it is; which would require the following key elements (Heart of Preston, Objective 3)

Submission Request 3 – The site is developed as a leading example of environmentally sustainable development, housing provision, and exemplary design.

- Provide appropriate building design and height controls so density responds to best practice urban design principles, local context and minimises adverse amenity impacts of overshadowing and visual bulk, while still allowing for housing growth, as follows.

- Development to occur only around (not over) the market.

Change to maximum mandatory overall building heights of:

- 14 storeys to the north of the precinct along Murray Road;
- 10 storeys to the centre of the site and to south-west corner; and
- 4-8 storeys to the south of the site, reducing in height towards Cramer Street with setbacks to meet Council's preferred overshadowing control.

- Reassess the proposed dwelling density and heights so that development first responds to a high standard of urban design and local context, specifically:
 - substantially reduced proposed dwelling density to enable site responsive urban design and to accurately reflect local housing demand;
 - include minimum 3-bedroom typology requirements to provide housing for families; and
 - add internal amenity standards for new buildings with controls for minimum residential daylight and outlook requirements.
- Create a pedestrian friendly neighbourhood that prioritises cycling and walking, by strengthening controls to:
 - improve pedestrian permeability with additional laneways, helping to break the precinct into smaller blocks to help create a village of buildings;
 - ensure that vehicle movement is not permitted on primary pedestrian connections;
 - require a continuous north-south pedestrian-only connection from Cramer Street to Murray Road, through the market;
 - ensure that changes to transport and movement in the precinct support Cramer Street as a 'people street'; and
 - identify active frontages and uses on key pedestrian connections, including the connection through to 421 High Street.
- Bolster Environmentally Sustainable Development controls to support the State Government commitment to zero carbon by 2050, and require (as a 'must'):
 - certified Green Star 'Communities' and 'Design & As Built' Assessment that identifies the development will achieve a 6-star rating, and a certified average 7-Star NatHERS accreditation;
 - ensure the controls are drafted to allow higher 'current' best practice standards as they improve over time;
 - require an 'all electric site' and no new gas connections on the site. Ensure the precinct becomes a 'renewable energy power hub that maximises onsite solutions such as solar panels, battery storage and microgrid;
 - separate collection glass recycling, hard waste, e-waste, organic and green waste;
 - provide for residential and commercial composting and/or anaerobic digestion and encourage urban agriculture facilities within the precinct, where amenity can be protected;
 - best practice water sensitive urban design and reduction of impervious services;
 - planting of canopy trees and vegetation to reduce the urban heat island effect, as part of the landscape plan requirement; and
 - require minimum electric vehicle charging and bike parking requirements.
- Improve the provision and design of open space through the following measures:
 - provide at least 10% public open space on site, at multiple key intersections including along the main east-west market street;
 - provide an additional financial contribution of up to 8.2% to enhance existing open space within the central Preston area;
 - a stronger overshadowing control to meet best practice standards to prevent overshadowing of the southern footpath of Cramer Street and Preston Oval Park

(including informal open space between the Oval and Cramer Street) as measured at the winter solstice; and

- provide design guidelines for open spaces to ensure that they are green, attractive and useable by a wide variety of people, including generous public seating.

Community benefit, facilities and affordable housing

Council Objective

Value that is created through the redevelopment is shared with the wider community through a range of state-of-the-art new community spaces, affordable housing, social programs and facilities and employment opportunities; which would require the following key elements (Heart of Preston, Objective 4).

Submission Request 4 – Secure community benefit from the development for a broad cross section of the community

- Support the proposed intention that fully funded contributions are provided by the developer for new community facilities that are required as a result of this development. Request that VPA, enable this contribution to be put towards a consolidated facility that is delivered on the Preston Civic Precinct site. There are significant benefits to the economic development of the wider Preston Central Precinct of having community services on the Preston Civic Precinct, and an integrated 'services' hub will be a more effective way of delivering community services to new residents on the Preston Market.
- Incorporate best practice community hub location and design criteria into structure plan and planning controls.
- Provide objectives to encourage creative industries and commercial cultural facilities (such as cinemas and art galleries).
- With regard to affordable housing:
 - strongly support the proposed mandatory nature of affordable housing requirement;
 - request an increase in the amount of affordable housing delivered at the site to 20%, with both the State Government and the developer providing funding to achieve this;
 - prioritise allocation of affordable housing towards newly arrived migrants; and
 - remove delivery option 4 (non-descript delivery arrangement) which does not provide enough certainty for the delivery of affordable housing.
- Protect the economic sustainability of the market and broader High Street activity centre with controls that ensure the amount and type of commercial and office floor space targets do not diminish their economic vitality.

Protection of Preston Market use on the site

Council Objective

That any development is contingent on a contractual commitment to retain the market use at the Preston Market site (Heart of Preston, Objective 5).

Submission Request 5 – Secure the market use on site

- Strengthen the market use condition in the zone to prohibit any other use from locating within the market footprint on the framework plan.
- Require the developer enter into a s173 agreement with Council, committing to the ongoing market use on the site. This must be entered into before a planning scheme amendment is gazetted, and reflected in the Charter of Community Expectations. The agreement should protect the market's diversity and affordability.

End of Document

From: [REDACTED]
To: [amendments](#)
Subject: Submission for Preston Market Precinct Structure Plan & draft Amendment C182dare to the Darebin Planning SchemePublic consultation
Date: Sunday, 11 July 2021 12:55:48 PM
Attachments: [Darebin Council's Preston Market Key Submission Points.pdf](#)

To whom it may concern,

I am writing to express my concerns as a local resident with the current plan for the Preston Market Precinct as outlined in the documentation sent out to residents on 18 May 2021 (*Preston Market Precinct: What You Need To Know About The Structure Plan and Draft Planning Scheme Amendment C182DARE*), as well as how this plan will impact our community.

I am most concerned about the massive towers included as a cornerstone of this plan. The scale of these is so wildly out of character for the area that it beggars belief, and there is no way that this aspect of the proposal is in line with community expectations for any buildings in our suburb. The tallest building has a preferred maximum height of 20-storeys, which would make for a skyscraper that is *more than double* the size of the next tallest apartment complex in the area. It will be opposite the seven-storey Casabella apartment complex, and the five- and eight-storey buildings that make up the 8 Clinch Avenue complex. The two towers on St Georges Rd, with preferred maximum heights of 13- and 10-storeys, will sandwich a comparatively minute three-story apartment complex on 102-106 St Georges Rd (ironically called The Pinnacle). The 13-storey tower will also be diagonally opposite from 388 Murray Rd, a five-storey complex.

I live in an apartment complex and am supportive of higher density living arrangements in general, *provided that they are appropriate for the area and in keeping with the neighbourhood's character*. Although I do prefer height limits more in line with existing buildings, the changes outlined in Darebin Council's submission to VPA (under *Submission Request 3*: namely that the building heights should be limited to 14 storeys to the north of the precinct along Murray Road; 10 storeys to the centre of the site and to south-west corner; and 4-8 storeys to the south of the site, reducing in height towards Cramer Street with setbacks to meet Council's preferred overshadowing control) are much more reasonable than what is currently being proposed. I also agree with the council's position that having a mixed-use tower built on top of any market buildings would be totally out of character for the area and not what the community wants or expects from Preston Market.

I can save a great deal of time and space within this submission by simply noting that I support everything contained within Darebin Council's submission to VPA, and that any Preston Market redevelopment would be vastly better for our community if all of their requests could be accommodated. I've attached a copy of the summary document that they have provided the community, just in case such a thing is necessary.

However, I would be remiss if I didn't go further in outlining my concerns for what feels like a complete lack of long-term planning beyond sticking a whole bunch of apartment towers into the Preston Market Precinct. Injecting 4,000 to 6,000 new residents into our community as a part of this plan would represent a 10-15% increase of the total population in our community (the ABS estimated population for Preston in 2020 was 38,460), yet there appears to be little to no consideration for how we as a community can expect to accommodate this sudden population boom.





One of my biggest concerns is that this project will see the owners of the site reap significant private profits in the short-term while also ultimately requiring significant public expenditure from the taxpayer in the mid- to long-term to accommodate such a sudden and massive population increase. It has been noted by our local council that the proposal would make for a site with greater density than Fishermans Bend. Having seen how poorly that project has been going for the local communities there I have little faith that our community would be adequately supported before or even after Preston experiences the population boom that would come with the proposed plan.








Perhaps an easy illustrative example is in our schools: all students have the right to access their local school, but this plan will see our local schools become significantly overcrowded. Assuming



that the ratio of school-aged children to adults in the new 4,000-6,000 residents is roughly similar to what we saw in our community at the last census (6.4% aged 5-9, 6% aged 10-14 and 6.1% aged 15-19), this plan will also lead to roughly 750-1,110 new students needing places in our schools on top of what we are already anticipating for our community. All of these students would be living in the zone for Preston West Primary School and the newly re-opened Preston High School, neither of which would have the capacity to accommodate such a large number of students.


Based on the population growth estimates from *before* this plan was conceived, the Department of Education made the decision to re-open Preston High School after the *School provision review for Preston* found that our community would suffer a shortage of 1,600 secondary school places by 2031. The recently re-opened Preston High School has an expected capacity of 1,100 students, and based on their enrolment numbers according to the MySchool website they will most likely reach that capacity within the next five years. In 2020 Preston West Primary had approximately 680 students enrolled across years prep to 6, with similar numbers in preceding years; the current maximum capacity of this school is not something that I am able to find, but I note that the school has already had new buildings added in 2013 and 2016 to accommodate growing numbers.

With existing schools likely to be at capacity before the new Preston Market Precinct is completed, where are we proposing to send children of new residents for their studies? Will we be opening more new schools in the area? Or will they be given places at our schools at the expense of current residents? Or will we simply overcrowd our current schools and fill up their open spaces with portable classrooms? As a parent of young children who I had hoped to send to local schools this issue is especially important to me.

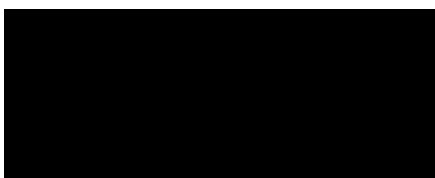
Do our roads, and Murray Rd in particular, have the capacity to accommodate several thousand extra cars every day as people commute to and from work or go about their daily lives? It is noted within the draft plan that the Preston Market Precinct is  on an increasingly congested road network , but it seems that this plan would only add to our congestion woes. As somebody who lives on Murray Rd I already have to contend with peak hour traffic (funnelled into a single lane if you are travelling westbound) every morning and evening, in addition to the  market traffic  on Saturdays (and to a lesser extent, Sundays).

While I had some hope that the level crossing removal would help to address our street  traffic woes, it s pretty clear that a key aspect of this plan is to cram almost all newly generated car traffic onto Murray Rd. The plan has disappointingly dubbed Murray Rd as  transport street  (as opposed to Gower & Cramer Streets   people street ) and will see the addition of two new sets of traffic lights, the western-most of which looks to be less than 100m from the existing traffic lights at the intersection of Murray Rd and St Georges Rd (which hardly seems necessary given that the level crossing will be gone), in addition to a very short section of the road possibly being widened for buses to pull into. Certainly the proposal creates 1,000 new local jobs, so there will be some in the community who may not need to use their cars as often as before (or at all, if they are fortunate), but with the addition of 4-6 times that many residents, many of whom will be using their cars to commute to work or carry out their day-to-day lives, this plan will see our local roads become significantly more congested.

No doubt many of these concerns would be considered as  beyond the scope  of any plan for the Preston Market Precinct, but this results in an incomplete plan for our community and fails to address inevitable problems that will arise as a result of what is clearly overdevelopment on this site.

I implore those responsible for this planning process to accept all requests and recommendations set out in Darebin Council s submission as written, and to carefully consider what will come next for our community as a result of this plan. You are the ones who will sign off on it, but we are the ones who will have to live with it.

Your sincerely,



Preston VIC 3072



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