

From: [REDACTED]
To: [amendments](#)
Subject: Submission for draft Preston Market Precinct Structure Plan and Draft Amendment (C182dare) to the Darebin Planning Scheme
Date: Monday, 12 July 2021 8:01:48 AM
Attachments: [Key Submission Points from Darebin Council re Preston Market plans.pdf](#)

To whom it may concern,

My name is [REDACTED] and I live in [REDACTED] in Preston. As a local resident I wish to lodge a submission with my feedback on the Preston Market precinct plan that I received in the mail back in May.

My biggest concern is around the height of this development: seven apartment towers ranging from 10-20 storeys tall and a mixed-use complex over the market that will be up to 10 storeys tall is completely out of touch with what our community wants and expects from this project.

Only somebody who is totally disconnected from our community could suggest that these preferred building heights are in any way appropriate. A cursory glance at the surrounding area will make it clear that we don't have any existing buildings that are over 10-storeys tall. Furthermore, the existing apartment complex on St Georges Rd is a good 7-10 storeys shorter than the two towers you are proposing to surround it with!

The plan offers assurances that sunlight to open spaces will be protected and notes specifically that the new open spaces as well as Preston City Oval will be protected for a whole three hours on the shortest day of the year: this year's winter solstice lasted from 7:30am until 5:00pm, so for more than 60% of that day it will be overshadowed (funnily enough the only review for Preston City Oval currently on [tripadvisor.com.au](https://www.tripadvisor.com.au) from 2018 notes that there is not much shade). Presumably there will be times every day throughout the year when these places will be overshadowed by the hulking towers that will dominate the market precinct, but these are not given in the plan.

The more detailed documentation makes it clear that there will only be strategies to minimise overshadowing to key public spaces, Cramer St and Preston City Oval. It bothers me greatly that while overshadowing protections for Preston City Oval get multiple mentions in these plans, there's nothing on protections for overshadowing of local homes. How many local residents will be living in the shade of market precinct monoliths as a result of this plan? This seems like it will be especially problematic for anybody within the vicinity of the towers on St Georges Rd; why isn't protecting local homes also a priority?

I'm puzzled as to why Cramer St (people street according to some parts of the plan)

is being singled out as being ideal for greater pedestrian access or more deserving of protection from overshadowing than High St, Murray Rd or St Georges Rd: sure, that's where Preston City Oval is located, but the only other places on this section of Cramer St are Cramer's Hotel (including the TAB and Pokies), the BWS drive-thru bottle-o and Darebin City Brass Band Room (which according to Google is only open in the evenings). Across the average week High St and Murray Rd both see a great deal more foot traffic than this section of Cramer St does.

While the map on page 8 of the documentation mailed out to me suggests that there'll be lower building heights at the street edges, the more detailed documents available online make it clear that the setback is just a few metres in most cases. Given the height of these buildings and how close they'll all be to the street edges, it's hard to see how this will make a meaningful difference to overshadowing.

I live on [REDACTED] but honestly can't believe that the High St shopping strip doesn't seem to be worth protecting from overshadowing given how popular this strip is compared with the surrounding streets. How many local residents will be spending their lunch or coffee break in the shade of the Preston Market precinct towers under this plan? It's hard not to suspect a conflict of interest given that there appears to be zero interest in protecting any other commercial sites from overshadowing by this particular site (aside from the pub/pokies and the bottle-o, which I can only hope is by virtue of their proximity to the oval and not because we want to be encouraging more residents to drink and gamble).

The indicative green space map from page 10 of the mailed plan feels disingenuous and designed to give a false impression. While the mailed plan pitches the 10% public open space contribution, the online plan makes it clear that this is almost certainly going to be a 6% land contribution with the rest of the contribution being in cash (the land being something that residents can enjoy for many years to come, the money being something that will be gone before we know it). The additional public open space in precinct imagery clearly overlaps with the proposed apartment towers and takes up a lot more than 6-10% of the site, and Mary Street is marked in the wrong location entirely. It's hard to shake the impression that the public open spaces are a very low priority in the eyes of those behind the plan when these are not fixed on either the mailed plan or the online plan while the privately-owned spaces certainly seem to be fixed.

It is truly bizarre that the VPA and Darebin Council were so closely involved in the consultation process and yet came out with such vastly different ideas for how this plan should look. It's clear to me that Darebin Council's submission to the VPA would vastly improve this plan in many ways, and I would strongly encourage you to accept all recommendations from our local council (publicly available summary attached to this e-mail for convenience).

Sincerely yours,



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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