



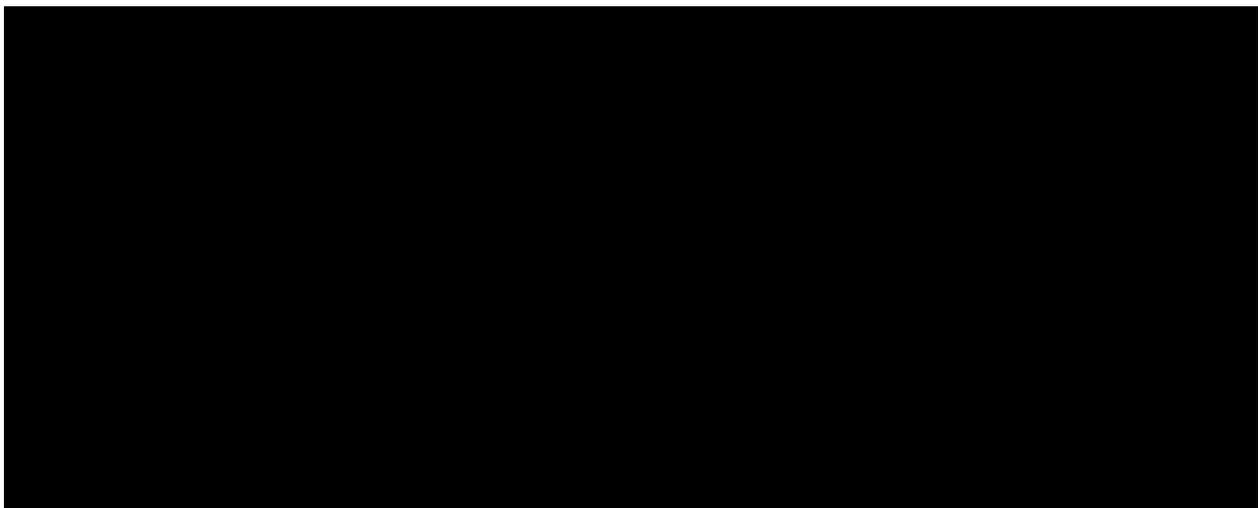
Submission to Victorian Planning Authority's draft Preston Market Structure Plan

This submission on behalf of the Central Preston Trackside Group focuses on very significant negative impacts of the draft Preston Market Structure Plan on the residential area north of Murray Rd, as well as the intersections between the Level Crossing Removal Authority (LRXA) Murray Rd project and the draft Preston Market Structure Plan. The Central Preston Trackside group is concerned by the absence of coordination between the LRXA project and the draft Preston Market Structure Plan, as well as key elements of both plans.

Some members of the Central Preston Trackside group have also made separate submissions about other aspects of the draft Preston Market Structure Plan (such as building height, environmental sustainability and impact on transport and other services).

Members of Central Preston Trackside Group are residents of the streets north of Murray Rd, Preston. We formed as a group in 2020 during the LRXA consultation on the removal of the level crossing at Murray Rd Preston. We have been lobbying for improvements to the trackside area between Murray Rd and Regent Street as part of the LRXA project (including against the proposed car park on Clinch Avenue), as well as pushing for information about the impacts of the proposal on pedestrian safety, traffic management and amenity. You can read more about our concerns on our website [Central Preston Trackside Group | Home](#) and our [Facebook Group](#).

This submission is made on behalf of the individuals listed below who have provided consent to join this submission:



Yours sincerely

 on behalf of Central Preston Trackside Group

1. Open space

1.1 Preston Central has the highest projected population density increase in Darebin and open space is already well below accepted benchmarks

Even without the market development, Preston Central has the highest projected increase in population density in Darebin. Darebin Council's 2019 [Breathing Space: The Darebin Open Space Strategy](#) projects the population of Preston Central to increase by 4,500 by 2028 (a 45% increase)¹. This is the minimum increase identified in the draft Preston Market Structure Plan.² An increase of 6,000 people (the maximum increase identified in the draft Preston Market Structure Plan) will increase the population of Preston Central by 63%.³ This does not take into account any other increased density development in Preston Central.

According to *Breathing Space*, access to open space in Preston Central is the second lowest in Darebin at 6.7 m² per capita and is projected to decrease to 4.6m² per capita by 2028. This is well below the accepted benchmark of 30 m² per capita.⁴ It is noted that this measurement includes Preston City Oval which is not generally used by the community as open space⁵ (see 1.5). It is not clear what the open space per capita will be if development occurs as is allowed under the draft Preston Market Structure Plan.

1.2 The Level Crossing Removal Project for Preston Station does not significantly increase open space

The Level Crossing Removal Project for Preston Station does not significantly increase usable open space in Central Preston. POSAP Area 3 creates an area of approximately 900m² of 'open space' adjacent to the railway track.⁶ Despite extensive lobbying by residents,⁷ there is no plan to improve the rest of the Murray Rd to Regent St corridor. This area is extensively run down, graffitied and used for dumping.⁸ Failure to upgrade the rest of the railway corridor is very likely to result in POSAP Area 3 also being trashed and becoming unusable (essentially a wasted investment by the State government).

Potential areas of open space that could have been improved along the Murray Rd to Regent St railway corridor have been set aside for future car parks to accommodate commuter parking.⁹

The new 'open space' in front of Preston Station created by the LRXA will not be a community-friendly and safe open space. It will not be used by the community as a recreational area. Rather it is the entrance to a busy railway bounded by a road.¹⁰ It will be

¹ *Breathing Space*, p 33.

² Draft Preston Market Structure Plan, p 5.

³ This percentage increase is calculated by dividing the proposed population increase (6,000) by the 2018 population as stated in *Breathing Space* (9,472).

⁴ *Breathing Space*, p 34. It is noted that the report by Mesh used to support the Draft Preston Market Structure Plan disagrees with 30m² as a benchmark.

⁵ *Breathing Space* p 27.

⁶ [Preston's newest open spaces | Level Crossing Removal Project \(levelcrossings.vic.gov.au\)](#); See also

Attachment A.

⁷ [Our Objectives | Cptg Staging \(centralprestontrackside.group\)](#)

⁸ See **Attachment B.**

⁹ [Pushback: LXP Carpark Move | CPTG Preston \(centralprestontrackside.group\)](#)

¹⁰ The Draft Preston Market Structure Plan map on p 22 shows 'primary vehicle access and movement' between the LRXA open space in front of Preston Station and the market.

overshadowed by the planned high rise to the east in the mornings and the raised railway and planned high rise to the west in the afternoons.

1.3 The draft Preston Market Structure Plan does not provide for sufficient open space

The draft Preston Market Structure Plan proposes that a 10% public land contribution with at least 6% to be land and 4% to upgrade existing open spaces.¹¹ This is a requirement for around 3,000m² of the market to be open space.¹² Land use principle L20 provides that at least 25% of this 6% to be consolidated into a single land parcel.¹³ This results in an area of only 750m² – the equivalent of two medium sized suburban blocks. This area is manifestly inadequate as a communal open space for 2,200 dwellings accommodating 6,000 people, plus market customers.

1.4 It is unclear how the draft Preston Market Structure Plan will ensure adequate sunlight to open spaces

The draft Preston Market Structure Plan provides that open space will be positioned to maximise access to sunlight.¹⁴ It is unclear how this will be achieved with the current building heights and orientations.

1.5 Preston City Oval is not a community recreational area

Preston City Oval does not contribute to Preston Central's open space except as a sports oval. It is not a general recreational area (except for very limited perimeter planting on Mary St), does not have shade and its arena seating is not conducive to general public use. It is not used by community like a park. Therefore, it should not be considered as general open space when considering the impact of the draft Preston Market Structure Plan.

Recommendation 1.1: That the VPA and other relevant authorities calculate and publicly release the per capita open space for Preston Central that would be available post development allowed under the draft Preston Market Structure Plan. There should be separate calculations including and excluding Preston City Oval which is not used by the general public as a community recreational area.

Recommendation 1.2: That if required, the draft Preston Market Structure Plan be amended to enable Preston Central to achieve the benchmark of 30m² open space per capita or close to that benchmark.

Recommendation 1.3: To ensure quality of open space and to demonstrate how the draft Preston Market Structure Plan will meet Land Use principle L22, that the VPA and other relevant authorities release shadow projections under the draft Preston Market Structure Plan to show how open space can be located and oriented to maximise access to sunlight. The VPA and other relevant authorities should also release shadow projections for the impact of the proposed development on the new open space in front of Preston Station.

¹¹ Draft Preston Market Structure Plan, 4.8.

¹² This calculation is based on the stated site measurement of 5.12 hectares (51,200m² Draft Preston Market Structure Plan, 3.1): 51,200 x 0.06 =3,072.

¹³ Draft Preston Market Structure Plan 6.2.1.

¹⁴ Draft Preston Market Structure Plan, Land Use principle L22.

2. Traffic and pedestrian safety concerns for residential areas north of Murray Rd

The Traffic and Transport Assessment conducted for the Draft Preston Market Structure Plan is manifestly inadequate. It only considers the impacts on the roads immediately bordering the market. It does not consider the impact of this major development on surrounding residential areas.

It also does not consider the impact of the level crossing removal stating that '[t]he exact extent of how traffic behaviour will change in this area is unknown once these level crossings are removed without undertaking in-depth analysis or consultation with the level crossing removal authority (LXRA).'¹⁵ It is unclear why the VPA as a state statutory authority cannot conduct consultation with the LXRA, another state statutory authority, for a major project such as this. This is not acceptable.

2.1. There is no information about the re-location of the existing parking west of the station

There is currently commuter parking west of the station on the corner of Murray Rd and St Georges Rd. This parking is retained in the LRXA plan, but the area is flagged for 'mixed use development' of up to 13 storeys in the draft Preston Market Structure Plan.¹⁶ There is no information in the draft Preston Market Structure Plan whether it is proposed that this parking be relocated and where to.

2.2 There will be four sets of traffic lights and a bus stop within 360m on the 'transport street'

There is no information about the traffic impacts and associated impacts on pedestrian safety and residential amenity under the draft Preston Market Structure Plan coupled with the LXRA plan for Murray Rd for the residential streets north of Murray Road.¹⁷

The LXRA plan relocates the current station commuter parking off Clinch Avenue north of Murray Rd. It locates a pedestrian crossing and traffic lights at the intersection of Clinch Avenue and Murray Rd to accommodate commuters crossing back across Murray Rd to Preston Station. This will be the fourth set of traffic lights within 360m¹⁸ (counting crossings at High St, Woolworths supermarket; Clinch Avenue and Spring St). The draft Preston Market Structure Plan designates Murray Rd as a 'transport street' – as opposed to Cramer St which has been designated as a 'people street'. Presumably this means that east west traffic will be directed to Murray Rd away from Cramer St.

There is also a large carpark at Woolworths on Murray Rd with entrances and exits on to Murray Rd and Clinch Avenue.

2.3 There will be increased traffic due to the residential building in the draft Preston Market Structure Plan

¹⁵ Traffic and Transport Assessment, p 5.

¹⁶ **Attachment D.**

¹⁷ This has been a key concern for residents: [Pushback: LXP Carpark Move | CPTG Preston \(centralprestontrackside.group\)](#)

¹⁸ See **Attachment C.**

The draft Preston Market Structure Plan provides for at least the same amount of market parking to be maintained.¹⁹ With 2,200 dwellings there will also be a significant increase in resident-related traffic, despite the proximity to public transport.²⁰

2.4 Traffic will be pushed into residential streets between Murray Rd and Regent Street

Experience has shown that when traffic increases on Murray Rd (for example on market days or when there are level crossing problems), drivers cut through William St and West Street, often through the Woolworths carpark which exits onto Clinch Avenue to access Regent St as the east west route. Commuters are also likely to access the proposed car park on Clinch Avenue through William St and West St.

There is no doubt that this pattern of pushing traffic from Murray Rd into the residential streets between Murray Rd and Regent St will increase due to the cumulative impacts of the market and LRXA design.

This will have serious impacts on pedestrian safety, traffic congestion and parking on residential streets north of Murray Rd and residential amenity.

Recommendation 2.1: That the VPA and other relevant authorities conduct a traffic assessment and the traffic management plan (including the pedestrian safety plan) that takes into account the impact of the draft Preston Market Structure Plan and the LRXA together.

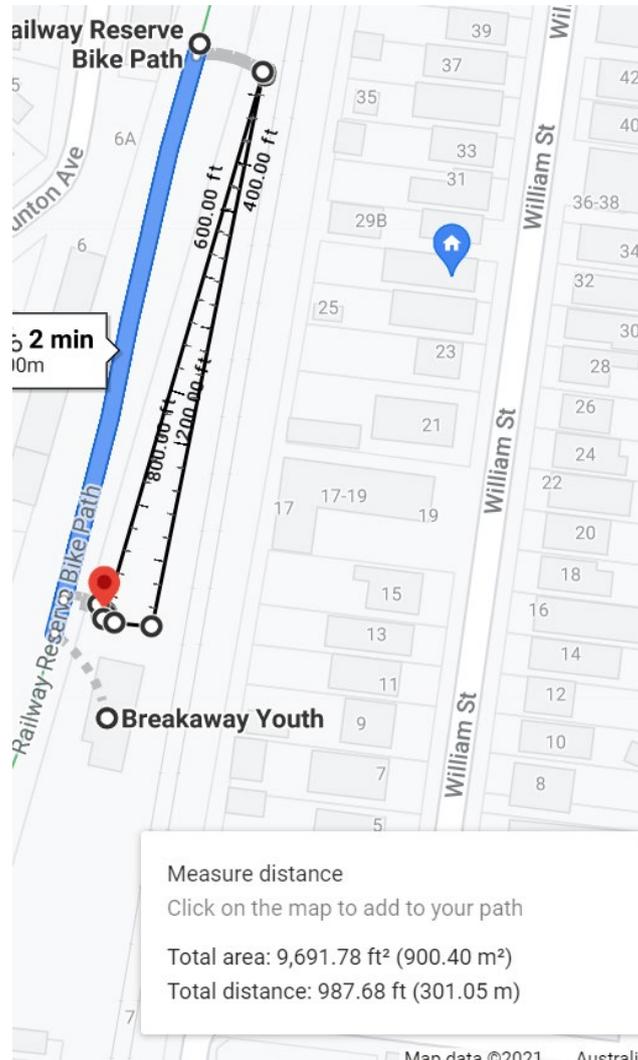
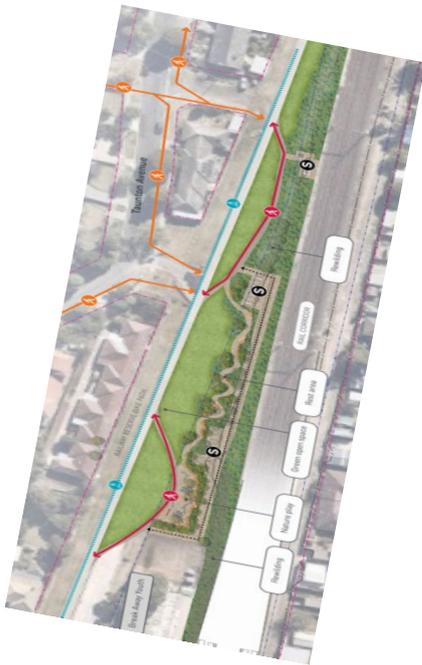
Recommendation 2.2: That the VPA and other relevant authorities model the traffic impacts on the residential streets between Murray Rd and West St and release publicly these.

Recommendation 2.3: If required, VPA and other relevant authorities to amend the draft Preston Market Structure Plan and LRXA plan to maintain pedestrian safety and residential amenity for the surrounding residential areas.

¹⁹ Draft Preston Market Structure Plan A 26.

²⁰ Draft Preston Market Structure Plan A 22 provides for provision of car parking at a 'rate which discourages private car use', and it is noted that the Traffic and Transport Assessment assumes resident parking at 50% the usual rate. However, the experience with high rise developments on Clinch Avenue showed that proposed reduced parking met with significant resistance from residents due to the impact on surrounding streets. The reality is that many people who move into the area will continue to have cars despite the proximity to public transport.

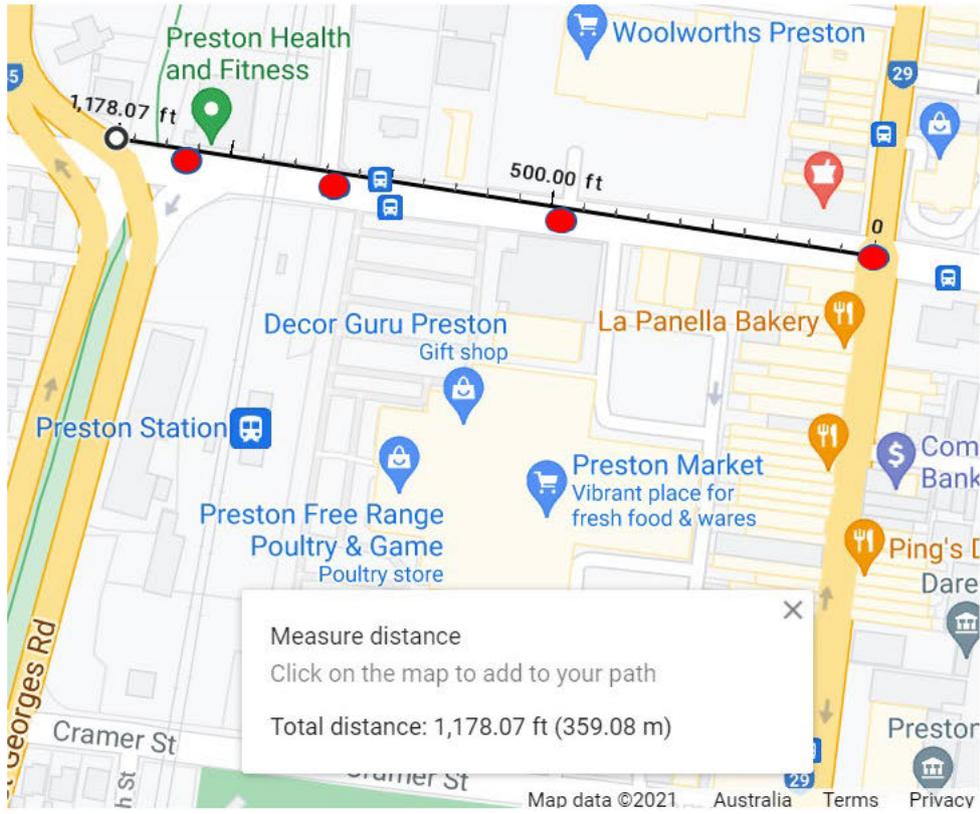
Attachment A: Size of POSAP Area 3



Attachment B: Current condition of Murray Rd to Regent St railway corridor



Attachment C: Traffic lights between High St and Spring Street



From: [REDACTED]
To: [amendments](#)
Subject: Central Preston Trakside Group submission to Draft Preston Market Structure Plan
Date: Tuesday, 13 July 2021 4:02:48 PM
Attachments: [Central Preston Trakside Group submission - FINAL.docx](#)

Please find enclosed Central Preston Trakside Group's submission to the Draft Preston Market Structure Plan.

Thank you

[REDACTED]
on behalf of Central Preston Trakside Group

Click [here](#) to report this email as spam.

From: [REDACTED]
To: [REDACTED]
Subject: Re: Central Preston Trackside Group submission to Draft Preston Market Structure Plan
Date: Tuesday, 13 July 2021 4:33:55 PM

Hi

An additional two people have contacted me wishing to sign their name to Central Preston Trackside Group's submission. Please add in [REDACTED]

Thanks, [REDACTED]

On Tue, 13 Jul 2021 at 16:01, [REDACTED] wrote:

Please find enclosed Central Preston Trackside Group's submission to the Draft Preston Market Structure Plan.

Thank you

[REDACTED]
on behalf of Central Preston Trackside Group

Click [here](#) to report this email as spam.