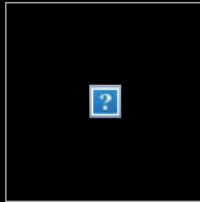


From: contact@engage.vic.gov.au
To: [amendments](#)
Subject: Making a submission Form Submission
Date: Tuesday, 13 July 2021 11:24:17 PM



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Submission Preston Market Precinct Structure Plan & draft Amendment C182 dare to the Darebin Planning Scheme Public consultation - May 2021

The affected property is the Preston Market site at The Centreway, Preston city of Darebin.

Online submission form at www.engage.vic.gov.au/preston-market-precinct-amendments@vpa.vic.gov.au

DAREBIN PLANNING SCHEME INCORPORATED PLAN (April 2021)

This document recognises the Market is affected by the Heritage overlay HO315, and addresses site specific exemptions from clause 43.01-1 of the LPPF, listing internal and external works where a planning permit is NOT required. The demolition of the Cramer St brick Market buildings during 2018, are now exempted from requiring a permit. The 'repainting of structural elements' is a welcome exemption reversing the general lack of maintenance and ambience of demolition by neglect. The reader notes this document offers no protection from major works such as the demolition of the original market buildings.

Preston Market PRECINCT STRUCTURE PLAN MAY 2021

The past 20 years have seen 3 attempts to develop the Preston Market site. The first iteration (circa 2007) was a modest affair with the developer proposing 2-3 storeys on the site with retention of the current market (see eg, Market Crossings, Victoria Stead et al, Breakdown press, Carlton Vic 2010). It was defeated after lax financial regulation and excessive risk-taking by banks, which burst the United States housing bubble. The event is known as the 2008 global financial crash, and was considered by many economists to be the worst financial crisis since the great depression.

The second iteration was divulged to the public during the 2016/17 VCAT hearings with 8-28 storey towers and 1620+ dwellings planned for the site. The statement "market renewal / refurbishment" hinted no change in location.

Stage	Dwellings	Description
1A	-	market renewal/refurbishment
1B/C	300+	Murray Rd mixed use (supermarket, speciality retail & dwellings)
2	300+	South mixed use (supermarket, speciality retail & dwellings)
3A	120+	Mary St mixed use retail and dwellings
3B	120+	Mary St mixed use retail market and dwellings
4A	200+	Station Ave residential
4B	200+	Station Ave residential
5	300+	Cramer St residential

A third iteration is embodied in the 2021 Preston market structure plan of May 2021. During the intervening 4 years since the 2016/17 VCAT case, site development was held up by funding uncertainty around elevating the railway line (and station), and the outcome of the site rezoning process.

During mid 2018, the Preston Market community reference group (CRG) was convened by the VPA, Capire and invited speakers. Four meetings were held at the Preston City Oval on Cramer St, each lasting about 2 1/2 hours during the evenings of May 23rd, June 7th & 27th and 8th August 2018. Prior to the first CRG meeting, on 21/05/18 Darebin council released their 2017 Preston Market Heritage study reports. In order to qualify for Heritage Victoria protection sites need to meet just one amongst seven Criteria for importance. Heritage report volumes 1 and 2 document how Preston market meets only five of these criteria (A, D, E, F & G). Darebin Council voted (minute no 18-149, 151, 152 item 5) NOT seek to apply a local heritage overlay for the market. In late 2018 Darebin Appropriate Development Association (dada) presented a case to Heritage Victoria seeking Heritage Status for the Market. The Brutalist architecture, early adaptation of space frame technology and other innovations were deemed less pretty compared to Victoria market, incidentally protected by the unmarked and shallow graves of about 2 thousand early settlers. The key recommendations were (a) the place NOT be included in the Victorian heritage register and (b) The city of Darebin protect the

site via a heritage overlay.

In addition Australia suffered the 2019/2020 black summer of disastrous bushfires, now understood to be the climactic influence of the Indian Ocean Dipole. In 2020 of the COVID-19 pandemic initiated yet another ongoing financial recession, recognised as the the worst global economic crisis since the Great Depression.

The key messages in the 2021 Preston market structure plan are not clearly articulated in one place or listed in the summaries, instead hints are offered in sections 4.4, 4.6, 6.2.1 (L15 and L24), 6.3.1 (B6, B13, B15c), 6.4.1 (A8, A20) and figure 5. These can be summarised as follows: (a) down size the fresh food market, (b) relocate to Cramer St, (c) shade with 12 storeys above, 17 to the north, 10 to the west and 4 to the east, (d) plus 10 and 12 storeys on St Georges rd, and (e) consider adorning with relics (section 4.4) from the demolition. The dwellings count is 2200+ representing 36% increase since 2016/17.

The structure plan contains one good idea (50 years overdue) to fix the circulation by removing conflict between vehicle and pedestrian access to the site (thanks Cardno).

The planning scheme amendment is vague offering insufficient details about

- the actual planning scheme amendments (is the current market to be protected, “preferred building heights” for apartment towers are excessive, there are no details about preferred building setbacks),
- affordable housing (what fraction, amenity quality etc ?)
- public open space is not just gaps between towers, but an absence of towers which are currently in abundant oversupply
- VPA and developer to articulate a commitment to the markets future
- Preston market management plan – aspirational whilst lacking in substance
- High St access – should not be too hard to achieve
- Marketing is not the right word for community engagement to use the public spaces, if any actually exist.

In addition

- 2200 dwellings is excessive
- A plan dominated by 1 and 2 bed apartments does not support future housing needs. Use a carrot and stick to motivate the developer to offer more than the token 3 bed apartment
- Too many nearby towers equals too much overshadowing and too much residential overlooking. Use the available planning tools to eliminate such annoyances
- VCAT 2016/17 presented plans with questionable internal amenity arising from squeezing an extra 10% onto every storey, but at the expense of all. Enforce apartment guidelines / minimum standards in terms of overall foot print, internal noise sources (no bed room on elevator shafts, carparks, plant rooms), room sizes, ESD, balcony dimensions (excluding 1.4 sqm of AC unit), access to daylight and cross ventilation. Forbid dwellings that can only offer “galley” kitchens.
- Provide open space for the residents
- Provide open space for the public.
- Enforce minimum standards for parking
- Enforce minimum standards for garbage and recycling collections
- Make the developer live in it for at least 5 years.
- Outlaw flammable building cladding.

The reasons for the submission are to express profound disappointment that an important cultural icon is to be replaced by dense thicket of towers that add to the existing glut of 1-2 bed apartments of questionable quality and available everywhere. Ask yourselves whether it is feasible that a short term building boom in Darebin can actually reverse the Covid-19 global recession.

From: [REDACTED]
To: [amendments](#)
Subject: Re: Submission Preston Market Precinct Structure Plan & draft Amendment C182dare to the Darebin Planning Scheme Public consultation - May 2021
Date: Wednesday, 14 July 2021 7:57:16 PM
Attachments: [CRG summary process and findings of the community 310818b.pdf](#)

Dear VPA

Please find attached an additional document to complement my submission concerning Preston Market Precinct Structure Plan & draft Amendment C182dare to the Darebin Planning Scheme Public consultation - May 2021
The affected property is the Preston Market site at The Centreway, Preston, City of Darebin.

yours sincerely

[REDACTED]

On 14/7/21 9:05 am, amendments wrote:

> Dear VPA

>

> Please find attached my Submission concerning Preston Market Precinct Structure Plan & draft Amendment C182dare to the Darebin Planning Scheme Public consultation - May 2021 The affected property is the Preston Market site at The Centreway, Preston, City of Darebin.

>

> yours sincerely

>

[REDACTED]

***“Community Report on the Preston Market Community Reference Group Process.*”**

- [1] Darebin Ratepayers Group (DRG), <http://www.darebinratepayers.org>
 [2] Darebin Appropriate Development Association, (DADA), <http://www.darebinada.org/>
 [3] Advocate for the Preston Market Traders (APMT), <https://au.linkedin.com/in/mannyspiteri>
 [4] Darebin Ethnic Communities Council (DECC) <http://http://decc.org.au>

[Introduction] The Preston Market community reference group (CRG) convened with the Victorian Planning Authority (VPA), Capire and invited speakers. Four meetings were held at the Preston City Oval on Cramer St, each lasting about 2 ½ hours during the evenings of May 23rd, June 7th & 27th and 8th August 2018.

The CRG had the opportunity to introduce them selves at the final meeting, finding x7 organisers (Capire and VPA), x4 Darebin council representatives, and x16 local residents, not including x1 (or more) who did attend the final meeting. Amongst the local residents were representatives for Delphi Bank (x1), Darebin Ratepayers Group (x1), Darebin Ethnic Communities Council (x1), Preston Market Traders (x1), Darebin Appropriate Development Association (x2) and an urban planning student (x1), leaving nine (9) with no declared affiliations. No one acknowledged any link to the site owner or the developer. One local resident admitted to having never visited Preston Market, and we were reminded that they now represent the future residents.

Prior to the first CRG meeting, on 21/05/18 Darebin council released their 2017 Preston Market Heritage study reports. In order to qualify for Heritage Victoria protection sites need to meet just one amongst seven Criteria for importance. Heritage report volumes 1 and 2 document how Preston market meets only five of these criteria (A, D, E, F & G). Darebin Council voted (minute no 18-149, 151, 152 item 5) NOT seek to apply a local heritage overlay for the market.

[DECC] Darebin Ethnic Communities Council unanimous position is to retain THE market not some market in the vicinity. The CRG membership lacked broader inputs from Asians and African communities. The consultation process failed to acknowledge the historical and cultural associations held amongst different migrant communities and Preston Market. CRG recommendations failed to capture the strong sentiments the migrant communities expressed via their representative, to retain the market buildings as they currently exist.

[DADA] There were concerns that the CRG member ship had limited representation from the diversity of Darebin residents, and this was further diluted by the numbers of organisers, council representatives and the unexpected inclusion of a town planning student. Much time was taken up by small group activities. We learned much about the site and two new concepts. As the Market currently lacks street frontage, there was talk it may be shifted onto the Cramer St car parks, making way for intensive development of the central and northern sections of the site. The site actually extends westwards beyond the Preston Station and might be unified by moving the rail line (vertically). However both matters currently remain unresolved.

The third meeting saw presentations from the CEO for Darebin and for the VPA who reviewed the incorporated plan, and a representative of the current site owner. Their comments raised more questions than we were allowed to ask as the meetings were tightly controlled with very limited time available to actually engage in robust discussion.

Throughout the consultation process, it was remarkable how quickly people were shut down when straying into topics of parking, building typology, heights, and urban design,

Planning professionals identified that traffic and pedestrian access is terrible, with poor vehicle entry and exit, two railway crossing traffic jams, no formal loading bays, and pedestrians thrust into traffic without warning. The lack of destination, conflict between public spaces, pedestrians and seekers of car parking, equals general chaos, and it is a miracle that no one has been killed. There exists uncertainty about plans for the Bell St level crossing upgrade and whether this will be extended to Cramer St and Murray Rd railway crossings. There is concern that site access is 48 years overdue for fixing.

A representative for the developer spoke (7/6/18) of their interest in the site shifting from “retail investment” to “urban renewal”. Our understanding is that these are financial aspirations that allude to site transformation from a neglected yet rentable land bank, to a new shopping centre overshadowed by towering stacks of mortgage loans. The current market buildings occupy approx 10,000 sq m surrounded by about 1000 visitor parking spaces. Plans divulged at VCAT in 2017 aim for approx 20,000 sq m of leasable retail & commercial space, with 1600 apartments in 8-28 storey towers. The development is currently held up by the funding uncertainty around elevating the railway line (and station), and the outcome (due end 2018) of this site rezoning process. There are unanswered questions about how these substantial changes might affect access to and the long term viability of Preston Market.

[APMT] Concerns were raised about the consultation process, in particular the under and over-representation of different parts of the community, the validity of assumptions underlying the statistical methodology, and how all of these can produce bias in the results. The subject was raised during the third meeting where this discussion was swiftly terminated. The matter was pursued in writing (email 16/08/18) seeking details about the qualitative and quantitative methodologies employed. In particular, questions were asked about the measures used to minimise bias, that might otherwise produce skewed or erroneous results. Were the sampled population sizes large enough to support reaching robust and meaningful conclusions. These questions have been met with silence. There is concern that a key planning decision has already been reached.

[DRG] We were dissatisfied with the consultation process. The opportunity to introduce ourselves to other CRG members was delayed until the very last meeting. Each meeting was tightly stage crafted and free time to provide input was very limited. The VPA asked us and also the community during the open sessions for suggestions and opinions about specific ideas, but those outside their very limited scope were immediately shut down.

The Owners only attended for a short time during the second part of the third meeting and therefore many questions, ideas and concerns were left unanswered and indeed they have not made clear their intentions for the site. Limited Designs were proposed. All the suggested planning controls suggested are a moot point because the VPA and Minister have limited powers to enforce the owners to comply. Questions about the Developer Contribution Plan (DCP) and the future for the Traders leases were not resolved.

There was actually no outcome from the CRG process, as the final meeting was very rushed and concluded with a thanks for coming. The organisers did not specify what Planning Controls would be put in place and as the owners did not consult we have no idea what the new Incorporated Plan might look like.

The end