

Chris Erlandsen

**OFFICIAL: VPA SAC-Referral 7
– Preston Market Precinct
Plan (PSP) and draft Planning
Scheme Amendment
C182dare**

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And draft Planning Scheme Amendment C182dare

1.0 Introduction

To the Chair and Committee,

My name is Chris Erlandsen and I have lived in Darebin for 43 years. I have worked in Darebin for 23 years and have regularly patronised the Preston Market for most of that time.

I would like to express my gratitude for the opportunity to have my say here today. I will be providing the committee with insights that I have gained over a continuous period of many years involvement in what can only be described as a protracted struggle to save the unique and important Darebin asset that is the Preston market.

I am an active member of two community groups; Darebin Appropriate Development Association (DADA), and Save the Preston Market (STPM) Action Group.

I have a strong interest (and academic background) in design and the built environment and for a layman, an above average knowledge of the Planning Scheme. I have asked questions related to planning matters at Council meetings and at Planning Panels Hearings on Re Zoning the municipality.

I have assisted neighbours and many others in formulating their positions and concerns on matters of development to Council and for VCAT hearings.

As a DADA member, I participated in the VCAT mediation with the council and the developer and the community. This process led to the developer being compelled to attend VCAT as at all times there has been a fundamental difference between parties about the value of the Preston Market. Over the course of this process I became increasingly aware of the fact that this issue deeply impacts a very broad section of the community and we need to take a stand.

It was DADA that initiated the hearing at Heritage Victoria regarding the Preston Market to test whether the Preston Market fabric is of State significance for which I prepared a submission.

More recently DADA along with the regrouped 'Save The Preston Market Action Group', galvanised the community voice, vigorously advocating to Council to strengthen its position on the imminent threat to the Preston Market and to mobilise the community where we have advocated and engaged with the broader community, market shoppers, market stallholders, local businesses, schools, organisations, Darebin Council and State politicians.

According to the community's extensive and protracted engagement, the prevailing view is that whatever happens on the land that is currently car park in the Preston Market Precinct, that the starting point must be that the market remains as it is, where it is.

1.1 Community Position

Our position is that:

- *We support Council in the retention of the market*
- *We accept that the precinct could be moderately developed.*
- *We do not accept the premise of the VPA and PMD plans which is to demolish 80% of the market*
- *We believe that the optimum solution for protecting the market and to ensure its survival is for it to be compulsorily acquired*

2.0 The Preston Market – a community viewpoint

2.1 Darebin demographics

Regardless of claims about the changing demographic, the suburbs of Reservoir and Preston consist of a large majority of working class folk and there are pockets recognized as being comprised of the most severely disadvantaged groups in the nation.

It is a vast demographic mix that is the catchment for Preston Market

For many, the existing Preston Market is a key community support resource – as a social meeting point as well as a market retail outlet offering affordable goods to assist manage increasing cost of living challenges.

In a sense, the existing Preston Market is contributing to the social capital of community members.

As defined by Vic Health, and cited in the April 26 2022 minutes from the Darebin City Council, *“Social capital is an overarching term used to refer to social connections and the broad benefits that these generate, including concepts such as trust, social connection and social cohesion, and can also broadly capture people’s affiliation with their neighbourhood(s)”*

Also referenced in these same Council minutes (April 26 2022, Darebin City Council), a profile of the Local Government Area on Darebin, stated:

-that 50.2% of people indicated that they felt valued by society in Darebin (compared to 52.9% for Victorians overall), and that 53.5% of Darebin residents rated their community as good or very good for community and support groups (compared to 61.3% for Victorians overall). Socio-Economic Indexes for Areas (SEIFA) is an Australian Bureau of Statistics ranking which looks at relative disadvantage.

Using the most recent data available, Darebin ranks in the ninth decile in the state and for Australia overall, which indicates that Darebin has a relatively high level of disadvantage. We contend that the current Preston Market is an asset and a support to the residents of Darebin, particularly benefiting those who are disadvantaged and in greatest need. Furthermore, we argue that the disadvantaged within this area would be disproportionately negatively affected by any changes to the Preston Market which could increase cost of goods, decrease access to the market (particularly for those driving), and where gentrification of the Market occurs (however unintentionally) further excludes a part of our population already feeling marginalised by the current community offering.

2.2 Failure to value

It has been disappointing to witness the gradual decline in the state of the Preston Market over time, particularly to the fabric. We wonder if the absence of reference to the heritage significance of the market in forums such as the CRG has been a strategy to continue this neglect and to surreptitiously build a case for demolition. Fortunately the integrity of the structure is largely intact. We imagine that the importance of the market to the broader community would have been understood by the major land owner and we are disappointed that a sense of social responsibility has not prevailed and has not translated to the ongoing maintenance of the roof structures and supports.

In 2015, the 1A- \$4.5 million badged as a “facelift” to some parts of the market were portrayed as a benefit to the community. It was reported to me by the then representative to the stall holders who had been complaining about the problems for years that most of the work done related to leaks in the roof over laneways which was causing power outages in fuse boxes when it rained. Some minor drainage work needed to be carried out to prevent water pooling within the market in the affected areas.

On the “to do list” of the “facelift” was the much-heralded installation of solar panels and upgrades to the toilets. These improvements were not carried out.

The work undertaken essentially addressed Health and Safety issues and resulted in the patchy replacement of the roof over some of the laneways which may well have eliminated the leaks, but has also through the use of sections of poly carbonate, contributed to a loss of internal ambience.

The new roofing over some laneways looked more like a temporary fix, like a work in progress, demonstrating how even small changes can adversely impact the feel of the place. The so called improvements had a negative effect on shoppers and some stallholders, who were under the impression that the work was temporary and wondered when the work would be properly completed. In addition stall holders on affected laneways complained that their display of fruit was getting “stewed” in the summer sun.

2.3 Unique Major Activity Centre

Referring to the City of Darebin Preston Central Vision 2006 Doc page 3 where the then Mayor states: - *“Preston Central has enormous potential, both in terms of maintaining its role as a vibrant local business and community hub and further establishing itself as a major activity centre for the northern region of Melbourne”.*

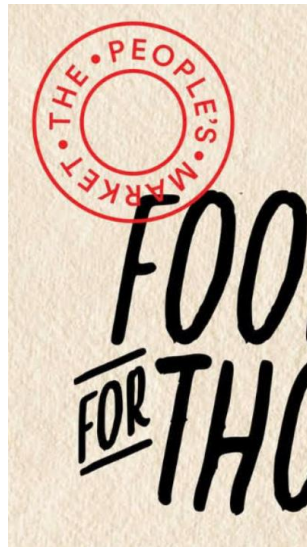
The Preston Market Precinct is zoned as part of a Major Activity Centre, but unlike other Major Activity Centres, the Preston Central Major Activity Centre includes the Preston Market Precinct in a central location amidst the busy High St retail centre. The High Street provides a range of retail offerings and services. This synergistic locating of activity centres is both complimentary and unique and surely ought to be nurtured not lost.

Under the previous Liberal government, City of Darebin was allocated 13% NRZ, thus now having plenty of opportunity for infill development, particularly in Darebin’s northern suburbs.

Darebin is managing the pressures of population growth with infill sites so there is less need to “max out” the Preston Market Precinct for the sake of losing the one thing that we regard as our nett community benefit.

The fresh food market has been successfully serving this regions' waves of migration for more than 50 years, making it a unique feature of the MAC and a destination for the immediate and broader community and this has not been considered with sufficient sensitivity.

2.4 *The People's Market*



While most of the Preston Market has been owned by the current majority land owner for about 20 years, advertising including as illustrated above, could be read as suggesting that the Market is publicly owned. The slogan "Preston Market- "The People's Market" certainly promotes this idea. Since the myth has not been dispelled, we hear criticism unfairly directed toward State Government and/or Local Council about lack of attention to the market for example, with regard to general cleanliness, maintenance, improvements, lack of signage to make the public feel welcome, arrangements with stallholders and promotion of the place more widely.

During the 2020-2021 pandemic years, all markets in Victoria were regarded as essential services, and Preston Market was also one in providing some normalcy to the day to day lives of many and importantly, consistently providing a wide variety of affordable, nutritious fresh produce throughout that time. All credit should be given to the stall holders who endured those tough times for which we are very grateful. The imposed Covid lockdown increased peoples' awareness of the importance of open space and places that make one feel a sense of belonging and the spaciousness of Preston Market gave comfort including through familiarity and the enabling of connections through sharing lived experiences and all under one roof.

Preston Market is an essential piece of infrastructure which was designed and built to be fit for purpose to satisfy the basic and essential human need to gather and obtain affordable fresh food. It was designed and conceived in the European tradition of markets while also reflecting the Australian character including through the use of local materials and finishes as called for by the respected architect Robin Boyd.

Many already think of the market as our civic square simply because, in the vicinity of Preston, there is insufficient or unsatisfactory places for relaxing in a convenient setting.

3.0 Community Consultation – reflections on the process

As a member and attendee of the phase one CRG meetings, I want to take this opportunity to debunk claims that the VPA has made regarding relocation of the market' and raise the matter as an unresolved issue and we want our third party rights to be properly acknowledged and heard. My submission to the VPA outlined numerous issues relating to the hasty manner in which Capire conducted these meetings that were tightly scripted and manipulated and did not allow discussion, resulting in a biased outcome.

We have a number of concerns arising out of the token consultation process and remain puzzled.

In their purported "detailed discussions" - pp8 - 2.1 Engagement in 2018, we were told on the night by Capire that: "the topic of heritage was not on the table for discussion". To omit this important issue during the community consultation was and continues to be a major failing and a denial of procedural fairness by not giving the CRG members the full picture of what was at stake.

We kindly requests that members on the committee ignore the claim made in the VPA's Draft Structure Plan Nov 2021, pp8 2.3 Key Messages from Engagement, where it states:

"Whilst the markets specific location in the precinct was not a key concern, for the majority of people, the community agreed that the essence of the market should be preserved including:"

(VPA's Draft Structure Plan Nov 2021, pp8 2.3 Key Messages from Engagement),

The above statement about relocation is a misrepresentation of the analysis and misleading in that the issue of relocation of the market was raised by the Architectus representative, no one else, who sat at the "Built Form" table where I too chose to sit.

It was reported back to the whole group as an issue and a brief and lively discussion then ensued but was cut short by the convener.

As it was nearing the end of the night session, participants were then asked to write a response on a prepared A4 sheet and to stay behind to complete it, then to hand it back. At the same time that instructions were given, many of CRG folk were walking out without writing anything.

Results of analysis came back the following week with no public oversight and can't have been complete or accurate. Capire claimed 51% of respondents agreed "the markets specific location in the precinct was not a key concern", which in subsequent iterations went from the phrase "a narrow majority" and ultimately became "the majority".

If Capire was genuine and conducted a process that was meaningful, they might have asked: – "How much of the market should be demolished to make way for a bunch of new residential towers and some open space"?

100% 80% 60% 50% 40% 20% or 0%

Instead, the CRG members were asked, "What do you love about the market?"

The Capire/VPA approach to engagement, in our view was not really to try to glean a community view or to understand our ideas as is claimed, rather to skew outcomes in order to justify relocation of the market. It simply demonstrates that there was a predetermined position.

We say that, of the 386 submissions received by the VPA during 2021 public consultation, that 380 submitters in general, overwhelmingly reject the VPA plan and by default the PMD plan to demolish 80% of the market.

The two community groups Save the Preston Market Action Group and Darebin Appropriate Development Association have tirelessly and successfully worked together to counter the VPA's findings with more thorough and ongoing work done to engage the broader community reaching out through weekly volunteer tables set up at the edge of the market, organising volunteers with expertise in graphic design, media and film. We have thousands of members on our two STPM Fb Private and Public pages with dozens of volunteers still wanting to join and wanting to know how they can help. We have had Working Bee's making designs for the sale of T shirts and other merchandise, and we have staged public events that have attracted media attention

Surveys and petitions were produced as evidence of our findings and we have even received public donations to our campaign.

Other STPM members will elaborate on the overwhelmingly positive response to the Save the Preston Market Action Group Campaign and the private Fb group that asked three simple and relevant questions.

4.0 Heritage

"Melbourne's heritage is fundamental to its cultural economy. That is why we must invest in our heritage, and in places that contribute to Melbourne's identity and distinctiveness"¹.

"The Victorian Planning Provisions contain clauses to protect aspects of distinctiveness, but can be improved to specify what Melbourne's distinctive aspects are, or how they should influence new development. This will encourage the creation of memorable, well-designed places that build on our city's legacy of distinctiveness and liveability"².

We agree with the above comments and the invitation that Plan Melbourne 2050 makes for the adoption of a different and broader way of thinking about distinctiveness and the part that heritage plays. One example of this different kind of thinking is the consideration of the potential impact that conserving the heritage of the Preston market has on the economic growth of Preston Central (or indeed the question to the contrary, that is, *what economic impact will failing to preserve the heritage of the Preston market have on the economic growth of Preston Central?*). Given the distinctiveness that the Preston Central Activity centre enjoys due to the existence and close proximity of the market, we suggest that it is quite accurate to suggest that preservation of the heritage significance of the Preston market is vital to the cultural economy of the area.

Plan Melbourne also speaks of the connection of story to heritage:

"There is more to heritage than place. The stories of Melbourne—including stories from before European settlement—help citizens understand the places where they live and work. They also help create a sense of belonging and community by encouraging tolerance and respect. Supporting new and innovative ways to tell Melbourne's stories will create opportunities for community building through arts, heritage and cultural projects and

¹ Plan Melbourne 2050 Outcome 4 Policy 4.4.3

² Ibid Policy 4.1.1

support built and natural heritage conservation and place-making for new and existing communities”³.

The existing footprint of the Preston Market is a place that satisfies the above sentiment and demonstrates the connection between the elements of social significance and built form.

We urge the SAC to exercise greater direction in the statutory protection of the market’s acknowledged heritage attributes. The ED of Heritage Victoria’s findings explains that while the fabric of Preston Market does not meet State level standards, that most, if not all criteria would be met at the local level. The latter point is often lost, while the former is extolled.

Recognition of this local level heritage significance can be achieved by applying an HO to the entire fabric of Preston Market thereby preventing the irreversible loss of significant heritage value. We are in support of Darebin Council’s position to retain and protect the fabric of the market, and this needs to be fully embraced and celebrated and appreciated as would be achieved through such an HO.

We want to ensure heritage protection and any other means to avoid the risk of even part demolition of the heritage place and provide certainty for stall holders and the public.

In addition to social and cultural attributes, we maintain it is vital that the technical and aesthetic attributes are recognised as significant. Reference to a number of comments included in the RBA report⁴ highlight the ground-breaking nature of the Preston Market’s design and method of construction. These comments also provide the context to this innovation – innovations that are employed in the construction industry to this day.

“The system is based upon a strong contemporary design philosophy that had gained little academic or practical exposure locally”

“The design approach was to become a significant design direction much later in Australian architecture. The Preston Market design precede the analysis by computer aided design by decade”.

“Conceptual design, detailed design, prototype-fabrication, structural testing, integration into the total building system, transport and erection all needed to be pioneered”.

“This was a world first, developed from first principles and on a significant scale”.

In discussions with one of the architect/designers of the Preston Market, Barry Pearce, we were told how as young and fresh graduates, he and the other architect/designer, David Rayson, were heavily influenced by their Modernist contemporaries (including the local Robin Boyd and others from abroad). He described their keenness to break with convention, embracing the combination of new architectural materials (concrete, glass and steel) and new technologies to create designs with a distinct character as is evident in the fabric of Preston Market. Barry Pearce referred to being

³ Ibid Policy 4.4.4

⁴ RBA ARCHITECTS + CONSERVATION CONSULTANTS p7

influence by the philosophy and teachings of Buckminster Fuller, an American influential across various design domains in the 50's and 60's, whose mantra was **"doing more with less"**⁵.

Fuller once remarked:

*"When I am working on a problem I never think about beauty. I only think about how to solve the problem – but when I have finished, if the solution is not beautiful, I know it is wrong."*⁶

And also declared:

"That to find some measure of beauty, or rightness of form, we must gain discernment by analysing the shapes and forms that are not only beautiful, but beautiful in their utility; forms that solve problems.

"Forms that are more than forms for their own sake".

"Architectural forms that are more than art"

The concept of reduction (of ornamentation) back to its structural skeleton can be traced back to the late 1930's to the Bauhaus School of design in Germany. Earlier still in 1896, the American architect Louis Sullivan described this reductionist concept in his famous phrase: "form ever follows function"⁷ referencing a core principal of modernist design still relevant today.

This concept is clearly demonstrated in the Preston Market in the space-frame roof design in particular. The Context report also refers to the "extent and expanse" of the Spaceframe roof structure and we are adamant that to demolish 80% of the fabric, would markedly diminish and devalue what is significant. It can only be fully appreciated in its totality and entirety.

The designer/architects Barry Pearce and David Rayson successfully combined, what was the latest in innovations of the time and that we contend, should satisfy technical and aesthetic significance criteria and should be included in the new overlay as an element of significance. They noted that one reason for including a space-frame roof system was to capture the 'visually interesting geometries that continually interplay as the position of the observer moves'⁸.

Post WW2, one strand of interest was about individual perception of the world around us. The concept of kinetics was a cross between physics and art where the viewer is moving/walking around a stationary sculptural structure, observing the interplay of line, shape and repetition to momentarily form new patterns created to play visual tricks and to deceive the viewer's perception.

In the Preston Market there is an important relationship between exterior and interior which is not recognised in the proposed linear market; currently when one enters into the market passing the concrete walls, it feels like a refuge, a place for withdrawal from the outside, into a contrasting realm where the individual feels safe, protected while surprised and excited by the senses.

⁵ R. Buckminster ("Bucky") Fuller Fourth Architecture
https://www.academia.edu/17116501/The_Shape_of_Things_that_Work_The_Fourth_Architecture#:~:text=R.%20Buckminster%20 (%E2%80%9CBucky, Architecture.

⁶ Ibid.

⁷ https://en.wikipedia.org/wiki/Form_follows_function

⁸ RBA ARCHITECTS + CONSERVATION CONSULTANTS p7 21

The relationship between exterior and interior is fundamentally connected to the location of the market at ground level. Easily accessible and fast service offerings in close proximity to fresh food retail and produce stalls and the undercover food hall all conveniently located at ground level is a compelling contributor to the vibrancy and ambience of Preston Market.

The impact of the interior architecture: - its intactness, its expanse and extent, the cruciform street layout, and the open air feel, combine to provide an authentic and irreplaceable interaction between users and spaces. This interrelationship of the changing space within; the relationship between where you are undercover and where you want to go is about the nature of space and the initial prospect, the unimpeded views over a distance when you can see beyond to and through walls of glass to partially obscured views and human activity where each pavilion presents a different character and feel. None of these relational aspects are evident in the PMD/Snohetta proposal.

There is a lack of recognition and celebration of the existing infrastructure of the Preston Market fabric and a lack of knowledge that it has been identified as having heritage significance. The community would value these aspects if they were educated about their existence. You cannot expect people to appreciate or value something until they have an understanding of its importance. Time and the history of technical and aesthetic achievements of the architects need to be celebrated and should be recognised as a part of the story of the Market's grittiness.

Such education, recognition and celebration would seem to be an answer to the question:

What measures could be implemented to assist in retaining the vibrancy and social and cultural values of the market through a migration, and should these be secured by way of a planning mechanism?⁹

At Direction 1 Conclave Heritage 2.6 asks – “Is the extent of retention of heritage fabric acceptable”?

We find it completely unacceptable to suggest that after retaining just two fruit and veg pavilions, then building a car park over the top, then punching holes in the N and S walls for access, it could then be proposed that an HO be placed on what's left. This does not take heritage seriously. (Re the taking of heritage seriously, we respectfully suggest that there was little evidence that the non-council expert witnesses were familiar with the Heritage Victoria submissions or determinations, or the Foundations '70 document).

The Burra Charter ¹⁰ supports our view of taking heritage seriously, and counters the position of both the VPA and PMD as to there being no link between and the cultural and social significance of the fabric of the market as shown, for example, the following statements:

- 1 *“There are places worth keeping because they enrich our lives-by helping us understand the past; by contributing to the richness of the present environment; and because we expect them to be of value to future generations”.*
- 2 *“The cultural significance of a place is embodied in its physical material (fabric), its setting and its contents; in its use, in the associated documents; and in its meaning to people through use and association with the place”.*

⁹Directions 1 Conclave document at 3.3

¹⁰ AUSTRALIA ICOMOS. 2000. The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance 1999, with associated guidelines and code on the ethics of co-existence in conserving significant places. Australia ICOMOS Inc. Available at: http://australia.icomos.org/wp-content/uploads/BURRA_CHARTER.pdf. <https://australia.icomos.org/publications/burra-charter-practice-notes/>

- 3 *“The cultural significance of a place, and other issues affecting its future are best understood by a process of collecting and analysing information before making decisions”.*

At dot point 2 above it is clear to us that cultural significance and the fabric of the place are linked through its setting and its contents; in its use, in the associated documents; and in its meaning to people through use and association with the place. And through that association develops attachment.

Recommendations

- celebrate and embrace the heritage elements of significance through an Overlay protection of the footprint and curtilage of the market
- recognise and protect the unique identity of the market
- recognise that the cultural and social history is embedded in the fabric
- recognise and embrace the technical and aesthetic attributes
- protect the intactness of the fabric
- retain the same overall area of the market
- retain the existing streets and the ground-level food hall
- recognise and protect the extent and expanse of the space frame roof
- retain the interior space within and between each pavilion
- retain unique, irreplaceable features i.e. the spaceframe roof and stand up concrete walls
- retain the discrete layout and location of each pavilion and its designated usage housing fruit and vegetable stall holders, delicatessen stallholders, each of the meat, fish and chicken stall holders and the merchandise stallholders
- retain the number and size of the stalls
- reinstate the self-supporting roof by ensuring that the additional weight of services attached to the roof structure do not compromise the integrity of the structure.
- establish a committee of management
- ensure a funded maintenance programme for ongoing upkeep

5.0 The VPA and PMD Plans and Impacts on the Market

We are concerned that we have not been heard by The VPA.

We have concerns around the interface of new buildings and the market regarding noise (from daily human activity, from waste trucks traversing along internal laneways and from organised day and night events), light spill, and odours emanating from waste when dwellings are in close proximity. These problems do not equate with the vision that the VPA describes below:

“to support a vision for well planned, efficient, sustainable and equitable provision of transport and infrastructure across the municipality to promote environmentally sustainable lifestyles”¹¹

And in addition this vision fails to address the reality that working class people currently require a vehicle not only for work to travel across suburbs, but also to transport their weekly shop. As

¹¹ At Point 97 in Part A the reference to CI 22.05(Transport and Infrastructure)

affordability issues become ever-increasingly relevant, this shopping expedition is more and more likely to be to a place such as Preston market.

The VPA suggests that 2000 occupants of the new development will commute to the CBD for work. This has not been substantiated. In fact the majority of workers living in Preston and surrounds are more likely to work in trades, lower level services or retail requiring a car to cross suburbs, so will not be commuting on the train.

Also of concern is how the PMD and VPA Structure Plan, are seemingly applied in isolation from the MAC and indeed independent of the “Heart of Preston”, “Preston Central Structure Plan” and the “City of Darebin Preston Central Vision 2006” documents.

As a strategic site it also has an SBO that could potentially be a major issue with changing climate conditions, however when questioned, Sophie Jordan’s response failed to satisfy.

The VPA make the assumption that the 2000 residents of the 1200 dwellings will use the market, but there is no guarantee that they will use or support the market to shop for fresh food. It’s not hard to foresee that even if those new occupants had limited cooking skills the restricted space in kitchens that actually discourages food preparation, would see resident more inclined to eat out on High St or order in Uber Eats. If this becomes the reality, the market will be impacted.

When the major parties refer to the influx of new residents to the precinct, they are suggesting that new occupants will all be there in an instant, but if development is staged, it could well be a trickle of occupants over a number of years, which is bound to have a detrimental impact on trade at the market.

These are numerous unfounded assumptions contained within the PMD and VPA plans and we have no confidence that the PMD plan or the VPA Plan will deliver for either the future population or the existing community. The PMD Doc and the VPA Draft Plan are in our view, more about a masterplan for buildings, more concerned with yield and the built environment, less about a living environment, and less about the consideration of and provision for health and well-being and an improved lifestyle for the current and future population or making an attractive, safe and welcoming environment.

6.0 Housing

Greater housing choice is very desirable and should be delivered through a range of minimal and incremental built form typology at various density levels in appropriate locations on the site. Single aspect housing, particularly to the south, should be discouraged on liveability grounds including passive solar principles.

There is a lack of specifics on the amount of affordable, public housing or build to rent accommodation. Have there been any studies/assessments produced that weigh up the positives and negatives of demographic composition, keeping in mind that this is Preston, not Box Hill, Abbotsford, Brunswick or Richmond? We question that the BTR be the suggested model to be applied here when that model doesn’t incorporate overarching principles about affordability.

At 104 of the VPA plan it states: “the change in demographics with an aging of the population will require additional housing growth and housing diversity”. There is little detail on housing diversity in the VPA Revised Draft Plan and the PMD plan.

The section at 106 of the VPA plan seems to be at odds with 104 by stating: “the Darebin Housing Strategy estimates that 66% of the projected dwelling demand will be 1 or 2 BDR dwellings”.

And at Point 110(c) states: “the activity centre is likely to attract smaller households comprising students, single workers, and young couples”. Again at Point 110(d) states: “lone person households are expected to be the dominant household type”.

Those previous statements suggest the encouragement of a very limited monoculture in 1 and 2BDR dwellings in the Precinct and we query if this is an objective in Plan Melbourne and how socially desirable this would be?

We are supportive of Council’s position on the provision of 30% of 3BDR dwellings for families and downsizers to be located nearer the market as they are more likely to shop at the market.

Greater diversity of housing is not only the proportion of 1, 2, 3 and 4BBR’s but a range of floor configurations and areas of each. This will need to be reflected in the new amendment

7.0 Urban Design

We agree with Mr. Morris’s view when cross examining Ms. Sophie Jordan in stating that PMD’s starting point was yield above all else.

While we are supportive, in essence of a reduction of the number of dwellings proposed on the site, we do not subscribe to any number of dwellings, but rather the need to work out what is appropriate and best for the broader area and the future survival of the market.

Outcome 4 of Plan Melbourne 2050, particularly dot point 3 are relevant pointing the need to capitalise on local assets when considering how Melbourne is a distinctive and liveable city with quality design and amenity.

We cannot accept the VPA Plan or the PMD plans to us are more like a social experiment in which density is unnecessarily excessive in terms of mass and scale of new buildings particularly on Murray Road creating a street wall that is not of human scale, unnecessarily causing overshadowing that degrades amenity to the south.

We do not accept the token amount of open space in the VPA and PMD plans which would receive lower levels of solar access and the open space as we heard from Mr. De Silva doesn’t need to be green open space.

We think that any development the Preston Market Precinct will have a huge impact on the look and feel of the surrounding area and that what has been proposed to date may meet standards and objectives in the Planning Scheme but it seems we are getting nothing that exceeds the standards or objectives ending up with second rate buildings and poor layout.

We refer to Outcome 4 of Plan Melbourne 2050 which defines Melbourne as a distinctive and liveable city with quality design and amenity and call attention particularly to the following points from that document which apply to the Preston market:

1. *The challenge ahead of this generation is to design a version of the city and state that, while protecting the best aspects of the natural and built environment, supports social and cultural diversity and economic activity and creates a sense of place.*
2. *An identifiable sense of place emerges from a unique set of characteristics and quality—visual, cultural, environmental and social. Communities with a high level of attachment to their cities also tend to have a high rate of Gross Domestic Product growth.¹*
3. *Place-making is a conscious strategy designed to promote people’s health, happiness, prosperity and wellbeing. It brings together a range of factors and disciplines, including economic development, urban design and environment, culture, community engagement, finance and governance. Place-making can apply to whole regions or individual neighbourhoods. In all cases it aims to capitalise on local assets, inspiration and potential.*

A city of diversity

1. *Melbourne is a city of distinctive centres and neighbourhoods, from the high-density, inner-urban areas of the central city to the leafy neighbourhoods of the east to the foothills of the Dandenong Ranges to the bayside beaches to the new growth areas to the south-east, north and west. Together these places create an accessible and inclusive city with living options that cater for people across all life stages.*
2. *Melbourne’s cultural diversity adds to the city’s vitality and creates economic and cultural benefits as well as a stronger understanding of the world. About 45 per cent of Victorians were born overseas or have at least one parent born overseas. Melburnians have family origins in more than 230 countries, follow 120 religions and speak more than 200 languages.*
3. ***The more that is done to strengthen Melbourne’s distinctive feel and identity, the more people will want to come here to live or to visit.***
4. ***Enhancing important aspects of Melbourne’s ‘heart and soul’ will add to its appeal as a destination of choice.***

We suggest that point 4 be changed to specifically include the Preston market and to read:

Enhancing important aspects of Preston’s ‘heart and soul’ will add to its appeal as a destination of choice.

We predict that even after the 2 Level Crossings have been completed, if it remains as is, that it will be the Market structure that gives Preston its distinctive character and gives the area its identity and we say therefore it must remain as the centrepiece to continue to play a prominent role in the north of Melbourne.

Based on PMD’s 1B and 1C plans presented at the VCAT hearing, it is hard to expect any innovation or wow factor in new buildings or the new market building as we know that artist impressions are far from reality. The VPA presented a few images, some being artists’ impressions showing a deceptive

worm's eye view of the new market structure and entrance with the illusion of having huge expanses of open space on Cramer St, but people just feel deceived and it do not us give any confidence, that what we see is what we get.

It is said that Darebin has the highest urban indigenous population, so we wonder why there has been no input from First Nations people even though the VPA espouses on p4 Revised Structure Plan Draft that: - *"We recognise and value the ongoing contribution of Aboriginal people and communities to Victoria and how it enriches us."*

Is this yet more evidence of a lack of genuine consultation with or input from First Nations people? as had they been consulted we would expect a very different looking Structure Plan.

Cl 37, 08 Activity Centre Zone-Purpose states:

"To create through good urban design an attractive, pleasant, walkable, safe and stimulating environment"

Unfortunately, the PMD Plan falls short, adhering to the same grid design since the 2007 Incorporated Plan and the VPA plan follows the similar placement of buildings on the grid.

Recommendations

That exemplary ESD be implemented including smaller block sizes with a NS linear orientation along the railway line, buildings with identifiable style or character, set backs on the main streets for tree planting, internal green spaces with undulating or contoured surfaces, a water feature and slightly curved paths on internal streets created by landscaping with high quality lighting and seating, bollards and featuring use of natural materials.

That the urban design used be responsive to its existing surrounds, resilient to the changing climate with north and west facades of new buildings shaded or doubled glazed from the harshness of the intense summer sun.

8.0 Urban Design and Built Form

We think the Draft Preston Market Precinct Structure Plan needs to be reconfigured and more broadly that the market needs to not just be retained but be central to the development approach of the whole site.

We are looking for exemplary building design which sets a new standard for the area and appeals as a destination while minimising the impact on the market.

The type of development in the North-West and South-West corners will be critical in terms of environmental sustainability principles, the overall amenity of the site and the possibility of the site appealing as a destination. Height and passive solar principles will be critical success factors in achieving these objectives.

The two corner sites located to the west side of the railway line facing onto the wider St Georges Road, would be more appropriate for substantial development, while to the east side along the railway line residential buildings of incremental "mid-rise" built form could be adopted in a linear N/S orientation closest to the station, stepping down to four storeys at street edges to be more

sympathetic to the market, responding to site circumstances and seriously considering the height impacts of the design on the broader community in factors such as¹²

- *Exceptional quality of design*
- *A positive contribution to the quality of the public realm*
- *High quality pedestrian links where needed and*
- *Good solar access to the public realm*

We are concerned that various contingencies have not been sufficiently or seriously considered as potential disruptors to both layout and built form. Broader options based on such contingencies have not been presented which suggests a lack of genuine and engaging attempts at community consultation.

- Further flood modelling and assessment could influence, even determine urban design and built form in the precinct. Impacts could include the introduction of design layout features such as wider separation/openings between buildings which allow for features such as dry-river beds as recently created in the Preston station area.
- An environmental audit if not already done, could reveal extensive contamination from the site's previous use as a tannery, particularly around the proposed new open space areas in PMD and VPA plans that would require remediation.
- Environmental audit findings could also influence, even determine urban design and layout

Recommendations

- That the fact of the community and Darebin Council being in accord on the imperative to retain the entirety of the market buildings be recognised.
- Explore the idea of a land swap or compulsory acquisition to retain the market.
- Remove tower design particularly from Murray Road and Cramer streets to maximise northerly light on the site, the Preston oval and the surrounds and that preferred height of new buildings on both Murray Road and Cramer St be 4 storeys accordingly.
- Indicate the height of new buildings in metres and storeys.
- Ensure that mixed use retail shops at street level have higher ceilings
- On the east side of the tracks, tallest residential towers (7 storeys maximum) are located nearest to the Preston Station, stepping down toward the north and to the south, to both Cramer Street and Murray Road and to the interface of the market.
- That the arbitrary nature of establishing dwelling numbers for a precinct is recognised (Council and VPA capped at 1200 and the PMD at a nominal 2400 with no apparent corresponding requirement for improved amenity) and that the key driver should not be yield but a more sophisticated consideration which includes amenity and local impacts
- Further work be carried out on contingencies to the development of the site including flood and environmental audit for contamination and that a larger number of alternative site options be produced accordingly and which retain the market infrastructure in situ.
- Build using flood resistant designs and materials

¹² Melbourne Planning Scheme C190 DDO63 Macaulay Urban Renewal Area Pp40 MGS Architects

- More porous Urban Design to the east of the railway lines is desirable, making smaller block sizes to make more walkable access and increasing solar access, particularly on Murray Road.
- That a 4 meter setback off the footpath along Murray Road be established in recognition of the heavy traffic flow, its narrowness and frequent state of congestion thus allowing for canopy trees providing space and shading buildings at ground level and softening edges.

9.0 Amenity

Our preferred approach to amenity for the Preston Market site can be summed up by reference to the following quotes¹³: -

“Precincts that provide authentic and hyper-local lifestyle experiences are thriving.”

“It’s not just about having the right amenity mix in your precincts and main streets. Neighbourhoods that are rich with character and provide locals with a ‘whole-of-life experience’ are helping communities to stay strong, resilient and connected”

It is our view that, the PMD and VPA Draft plans if materialised will not provide amenity as described above and will severely diminish amenity for not just the precinct but the surrounding area.

The PMD and VPA Draft plans if materialised will not comply with Clause 58.

The PMD and VPA Draft plans if materialised will result in insufficient direct solar access to new buildings that have a south facing, and to the lower levels of building south of Murray Road and in inadequate separation of buildings in the NW corner of the precinct and in doing so will be contrary to the following guideline diagram from the Urban Design Framework:

¹³ Jessica Christiansen-Franks, Neighbourlytics <https://neighbourlytics.com/blog/2022/5/10/the-top-five-things-the-property-sector-needs-to-focus-on-right-now>

OBJECTIVE 5.1.3

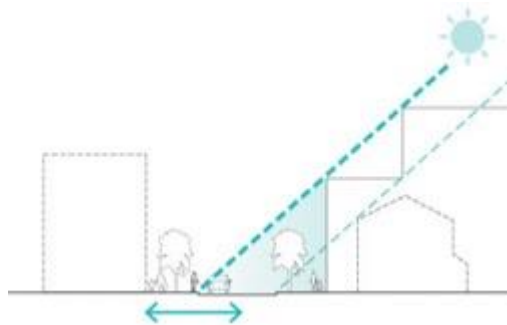
To ensure buildings in activity centres provide equitable access to daylight and sunlight

Locate and arrange the building to allow daylight and winter sun access to key public spaces and key pedestrian street spaces.

TIP

A strategic planning process can identify and establish key public spaces.

I. A)

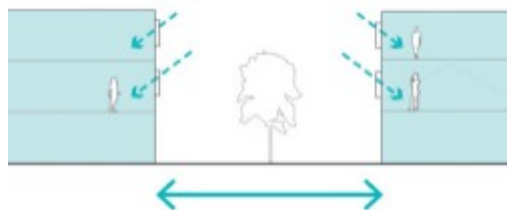


II. B)

Allow sufficient distance between buildings to allow access to daylight for neighbouring windows.

TIP

The higher the surrounding buildings the further they may need to be separated.



III. C)

Protect daylight and sunlight access to the private and communal open space of adjacent dwellings.

The apparent merging of what is private and communal land and what is land that is open/available for public use needs more definition and clarification. For example, Plan Melbourne refers to “quality” open space and in Darebin’s Breathe document refers to “green “open space

What is passive open space and active open space for public use must be clearly identified and shown in the amendment

In our view it's crucial that the new amendment demonstrates that the precinct is an attractor and not a detractor not only to Preston, for both the existing and future population.

The precinct must be a desirable and welcoming place where people choose to live for its pleasant setting, with a diversity of large and small open spaces.

10.0 Open Space and Amenity

Melbourne's Plan Direction 4.1

Create more great public places across Melbourne

By adopting a place-making approach, the standard of urban design of public places can be raised across Melbourne's suburbs.

A more focused approach will be adopted to strengthen the design quality of public spaces and the interfaces between private development and the public domain.

Improvements to public spaces and more thoughtful integration of new development can make a measurable difference to the amenity, economic vitality and the cultural and social life of Melbourne.

To achieve a consistently high standard of place-making across Melbourne, the planning system will strengthen the design quality of public spaces and the interfaces between private development and the public domain.

With the increase in housing density and growth in population, not just in this precinct, but the whole MAC, we are urging that more than 10% of open space is required on this site (CI 53.01).

We agree with Mr. de Silva (para 29 p 4- Mesh) that- "Without intervention, a decline in the character, composition and accessibility of open space. Impacts on the existing open space network are likely to be significant."

At Paragraph 30, we are supportive of his opinion that – "these contextual issues serve to elevate the relative importance of larger scale redevelopment sites both from the perspective of achievement of a range of development, urban design and community building objectives but also more specifically from an open space provision perspective, where it is acknowledged that the potential to achieve a land contribution (as opposed to a cash contribution) is greater than in other instances...."

The LXR open space is appreciated as strip, active open space, but not the high quality expansive passive open space that is desirable and so desperately needed in this area due to the already "the cumulative impacts of intensive redevelopment". - (Mesh p2)

In this instance, we are opposed to another S173 Agreement unless this can be signed off before gazettal.

06 Plan Melbourne 2050

Plan Melbourne 2050 states:

- *“Melbourne is a sustainable and resilient city. Melbourne will be cooler, greener and more liveable. The community's access to open space and nature will be enhanced and biodiversity and ecological processes will be safeguarded for future generations”.*
- *“An integrated approach to managing the urban water cycle will make the best use of all water sources and transform Melbourne into a water sensitive city - protecting the health of the city's waterways and bays, reducing the risk of flooding and keeping parks, gardens and street trees thriving”.*

Taking into consideration the size of the precinct, we are supportive of a higher percentage than 10% of public open space that must be delivered on the site and to not allow a monetary split amount to go off site and this needs to be reflected in the new amendment.

Included in the mix of open space, we want to see as essential provision for Passive Open Space like a pocket of urban forest with a sufficient number of large canopy trees and a water feature such as a dry creek bed, like in the LXR open space already delivered.

We are not asking PMD to over compensate for the deficiency of open space in the locale generally, but we are asking for the provision of a fair share of a land contribution on the site. We seek more than 10% of a land contribution.

A greater effort needs to be made to mitigate the heat island effect in the precinct and reducing reliance on AC which will be another drain on cost of living for residents and this will enhance ESD standards.

In addition to or replacement of underwater tanks for stormwater retention purposes, a water feature or small lake would be an attractor for all users of the area, appealing for aesthetics, cooling the immediate vicinity and for well-being.

At the VPA's Land Use Strategies 6.2.1 p24 Land Use – Preston Market

- L16 states: *Allow the opportunity to extend market activities outside the market building and into adjoining public spaces.*

And

- B20 states: *A building entrance to the market must face Cramer St and should be designed to act as a focal point capable of hosting formal and informal community activities and short term retailing.*

In the VPA and PMD plans, the provision of open space seems somewhat arbitrary as boundaries are blurred. To explain, it is unclear on any diagrams exactly what/where is communal open space, what/where is public open and from Mr Gobbo's opening statement, we have now learnt that open space to the south of the new market on Cramer St. will be designated private open space potentially denying the public free use of that space. In fact that land could be used to park food trucks. We do not accept that open space to be encroached by any other use, apart from the intended primary purpose as open space.

If space is required for uses such as night time food trucks or night time events that include fast food vans or daytime short term retail, then there is a case for another or more onsite open space to be provided. We think this requires deeper explanation. We maintain that any commercial activity that is permitted outside of market buildings as proposed by the VPA Revised Plan, will in time degrade what is shown as green open space, discouraging use for its intended purpose of relaxation and well-being in sunlight, fresh air and natural surrounds.

Recommendations

- In the new amendment, the quality, type and amount of open space must be clearly defined
- Setbacks on Murray Road for deep rooted tree canopy is preferred

- Assuming the market remains in situ, ensure the location of the designated open space areas to the north and south of the market's easterly pavilions will have direct sunlight, where market shoppers could enjoy alfresco dining as well as retaining the internal food hall at ground level.
- Increase in the amount of public open space with more opportunity for canopy trees as a civic square to the north of the market would be an attractor for public gatherings, activities and events.
- Requirement of high quality green open space and a water feature appropriately located to be the attraction.
- Provision of deep rooted canopy trees using native species on all laneways and where possible.
- Provision of high quality fixtures and seating, and ground level and overhead lighting.
- Provision of natural elements (large rocks) to create highly attractive natural environment.
- Retention of the two significant eucalyptus trees situated in the south east carpark

ⁱ Peopleperhour (Meagan Crawford), The Rise of the Creative Economy, July 2015, p1 – referenced in Victorian Government "Creative State Global City", Creative Industries Taskforce Report, November 2015

Traffic, Movement and Parking

We agree with Mr Tim De Young when he declared that:

He supports the rate of 3.5 for parking for both market and non- market retail there is no body of work done that indicates that suppression is required that suppression of car parking is unlikely to lessen traffic and that it may impact the commercial viability of early stages of development provision of the same number of easy to access, convenient and safe car parking spaces as existing provision of loading bay and parking space for stall holders delivery vans and trucks is essential provision of space for E Bikes and cargo bikes.

Any loss of accessible market parking generally and specifically loss of close, convenient car parking for market shoppers to transport a weekly shop that will discourage market shoppers or will encourage them to go elsewhere.

Increased congestion on Murray Road and Cramer St and the excessive height of proposed new buildings on Murray Road, resulting in deterioration of air quality particularly in summer, a further increase in the heat island effect due to north facing walls of glass.

10.0 Drainage, Flood and Inundation

In Darebin Council's - Preston Central Structure Plan (Sept 2006) at p119 states that this precinct: "offers the most important opportunity for development in Preston Central." With a disclaimer, an addendum (26) that states: - "It should be noted that flooding presents a potentially significant constraint on development in this area."

- And at CI 37.03 states: - To ensure that any development maintains the free passage and temporary storage of floodwater, minimises flood damage and is compatible with flood hazard, local drainage conditions and the minimisation of soil erosion, sedimentation and silting.

<https://planning-schemes.app.planning.vic.gov.au/Darebin/ordinance/37.03>

The VPA Revised Structure Plan does not ensure:

- that any development maintains the free passage of floodwater or
- that any development minimises flood damage and is compatible with flood hazard, local drainage conditions and the minimisation of soil erosion, sedimentation and silting.

At CI 53.18-5 Stormwater management objectives for buildings and works.

Standard - Contribute to cooling, improving local habitat and providing attractive and enjoyable spaces.

There is potential for disastrous flash flooding and inundation that we maintain has not been properly or adequately dealt with since this was raised at the VCAT Hearing.

The evidence appears in Melbourne Water's submission #354 to the VPA.

In MW's submission to the VPA, they state:

"Melbourne Water previously provided the below initial feed-back via email (17/06/2021) to the VPA: Building Envelopes/Development Foot-Prints - Section 7.1 of Cardno's report reflects on the flood modelling results, including identifying areas that are likely to experience an increase in flood levels based on the developed scenario flood modelling undertaken to inform this report. The mitigation measures suggested in this report (but not tested by Cardno) or similar approaches to mitigate offsite impacts due to the development of this precinct, must be incorporated into an updated flood mitigation assessment (including updated flood modelling) for this precinct. Any updated modelling should reflect the conceptual building envelopes/development foot-prints represented in the draft PSP document and supporting documentation".

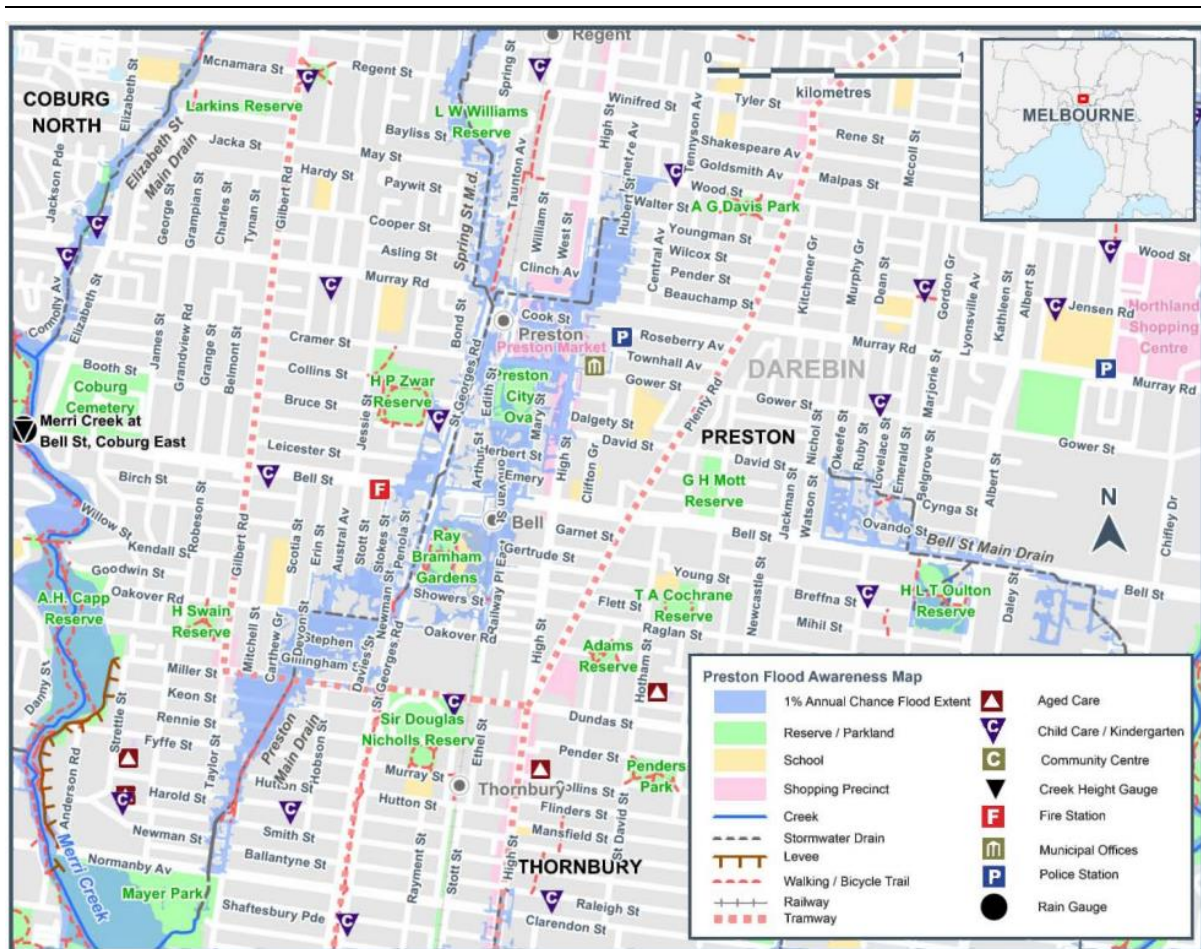


Figure 1. SES Local Flood Guide: Preston Main Drain (2020)

We say that the VPA have downplayed and understated the amount of work yet to be done on this matter, such as: “modelling of flood mitigation measures” approaches to mitigate off site impacts due to the development of the precinct, including updated modelling for the precinct.

In our view, this remains an unresolved issue and it is in the public interest to have this sorted before the panel makes their deliberations as the issue could potentially dictate the built form on the site.

Points No 13 and 14 p18 (4.10 Drainage) Melbourne Water principles of provision should be considered for the Amendment to the PMP Structure Plan.

-13. A robust consultation process will govern the creation of development services schemes.

- Melbourne Water will consult with industry, landowners and other interested parties prior to finalising and establishing new development services schemes, including possible mediation and independent review.

-14. Development services schemes will be adjusted for innovation works that benefit the scheme.

- Development services scheme charges will be reduced if developers provide innovative solutions that benefit the scheme and result in significant savings to scheme finances.

Melbourne Water will reward for innovations that financially benefit the scheme. The level of reward will be based on the particular circumstances relating to each innovation. The reward or reduction in scheme contribution will be based on the saving to the scheme; the overall financial benefit of the innovation, and other benefits derived by the developer.

Melbourne Water will reduce scheme water quality contributions according to the percentage of best practice (for Total Nitrogen) that is achieved within the development.

Urban Renewal Cost Recovery Scheme

Schttps://www.melbournewater.com.au/building-and-works/developer-guides-and-resources/drainage-schemes-and-contribution-rates/urban

<https://www.melbournewater.com.au/sites/default/files/Principles-for-provision-of-waterway-and-drainage-services-for-urban-growth.pdf>

In our view, drainage and flood must be considered in relation to extreme and unpredictable weather events due to climate change that could have disastrous impacts, particularly in light of the increased run off from new recent and future infrastructure?

Looking at (Cardno's September 2019 Stormwater Drainage Assessment Report), the

Drainage dot point 1.p18 states "Flooding on the site is more limited than suggested by the existing SBO boundaries."

There could be considerable future development both within the catchment area and above the catchment area boundary up to the ridgeline-Plenty Road that will cause an increase in surface run off.

In addition, these finding are in isolation of any future development to the north and east of the MAC that could severely impact the amount of surface water flowing into this PMP basin. In their calculations we are wondering whether Cardno has taken this into account.

In the VPA's Draft Revised Structure Plan, Dot point 3 p18 states:

Drainage issues will not prevent development in the precinct. However new development will need to incorporate effective water management solutions, site layout and, where required, compensation flood storage.

Yet it seems that the next paragraph contradicts the above stating: "Elevation of the line (as part of level crossing removal project) must maintain adequate flooding separation".

So that new buildings do not act as a levee, we maintain the view, that new buildings could be raised on stilts wholly or partially to allow surface water to flow unimpeded if necessary.

At 7.1 in Cardno's Report under Flood Mitigation, it states "there will be flooding at various locations on the site that would be independent of each other".

If it is assumed that under the PMD/VPA plans, the whole site is built on, that those buildings, especially along Murray Road, will become obstructions to the natural flow of surface water and we believe it's worth questioning where that displaced water will go or worse sit, without flooding into basement carparks.

We contend that the public has the right to know how this issue is managed for the best outcome, so that heavy rains do not adversely affect access and movement on the site and prevent future insurance claims.

We strongly support the placement of a dry river bed and a small above ground water feature together with underground tanks filled from the market building roofs, would be a better outcome.

13.0 Matters outside the planning scheme: S173 Agreements

It must be a precondition that all S173 Agreements should be in place and settled, before the new amendment goes to the Minister.

Particularly concerning:

- *the market buildings (restoration of the fabric and some refurbishment as outlined in the Context doc)*
- *ensuring the ongoing retention of the footprint and use as a market*
- *ensuring the number and variety of stalls, configuration of stalls*
- *clearly defined and longer term contracts regarding tenure and leasing arrangements for stallholders*
- *ensuring provision for the same amount of car parking and an EV charge station for EV cars*
- *easy access and storage area for push-bikes and EV bikes including cargo and trailer bike parks and an EV bike charging station for public and private use.*

In the whole of the VPA Draft Structure Plan document, we note the use of the word “stall-holder” is applied just once.

Instead we read words like “retailers, vendors, tenants, shopkeepers and others”.

In the new amendment, where there is any mention of the market and sale or handling of fresh produce, the term “stall holder” must be applied so as to separate their title from being treated the same as renters or shopkeepers, which could also have implications on the number of car parking spaces.

As far as we are concerned, there is no certainty in S173 Agreements and we have little confidence that they will be adhered to for the benefit of stallholders, market goers and shoppers.

- At point 191 on the VPA Revised Structure Plan, it states: “because the market is privately owned, planning must for that reason, be founded on the fundamental truth that the long term operation of the market will always ultimately be in the hands of the party who owns it”.
- At point 192 states: “In general terms, the planning system operates to consider the aspirations of the landowner and either allows/permits for that landowner to use the land in the way they desire, or not. It is a rare thing indeed for a planning control to compel a private landowner to use the land for any particular purpose, against the will of the landowner.”
- Our comment here is that the purpose of planning controls is to present a framework to any individual or organisation to guide what, where, how, why and when a structure can/can't be built without fear or favour.

At 196 then states: “The Minister has asked the Committee to advise on appropriate planning mechanisms to secure the markets long term operation.

And at 201 states: “Planning cannot direct or determine every minute aspect of the continuation of a particular operating model for the market”.

This is exactly the reason why the community voice calls for compulsory acquisition.

However, if the panel leans toward implementing S173 agreements, then we say these must be entered into using very clear and concise language so there is no room for ambiguity or misinterpretation and made prior to Gazettal.

14.0 The essence of the existing market

Many do not realise, but there are three phases of trade at the Preston Market, particularly on a Saturday.

First phase come the early bird shoppers, then at mid-morning come families who might shop and eat and let the kids loose safely and toward the close of trading come the bargain hunters so less produce is discarded and customers benefit.

For the Preston Market stall holders, most would say there is a lack of certainty regarding leasing and tenure arrangements and rental costs that are already some of the highest of all markets, under current management, giving them a sense of limited or no future prospects and less variety no competition amongst stall holders.

We argue that the VPA Revised Draft Structure Plan and PMD will, in time, potentially allow the ultimate demise of the Preston Market, repeating the recent scenario of the Moonee Ponds Market and its ultimate closure.

The concern is the proposed relocation of Preston Market with its street address on Cramer Street will make it a mere side show, not the main event as it has been.

Preston Market has never had a clear street address and despite this has thrived. On this point both the VPA and PMD continue to assert that relocation will benefit the market, which to us, is unfounded particularly if don.

The main event we fear, will become the prominent residential towers with non-market retail on edges and the new Aldi store on Murray Rd as distractions before you actually get to the market.

The PMD and VPA plan, is pushing the market to one side, no longer the centre piece, gradually killing off trade for stallholders, making business financially unviable and thereby justifying for the land owner, to determine that closure of the market is the only economic option.

If Snohetta's proposal was adopted, the first sign of the markets demise we predict, will be when shoppers who have bags of produce will choose not use the mezzanine food hall, as it is not convenient or accessible, regardless of having lifts or escalators installed; it's just not easy.

Demolishing 80% of the market is not an acceptable and is a second rate solution. To us it seems counter intuitive with anticipated massive influx of new residents to the precinct, whilst making the new linear and smaller market less user friendly with narrow aisles, less character, fewer stalls under a car park making the retained space frame roof redundant.

Higher rents, less competition and subsequently higher prices to the public.

Adverse impacts like increased vehicular congestion particularly on Murray Road with controlled traffic lights at intersections on High St and Murray Road and St Georges and Murray Rd that prioritise north/south movement, culminating in limited vehicular access and movement into the precinct, especially at peak times.

Under the Council and Community alternate plans with a potential increase of thousands of new residents in the precinct, activity within the market area would be better catered for in its existing footprint.

While PMD and the VPA are making every effort to convince us that the market in its new location fronting on to Cramer St is best for the future of the market, we find it difficult to understand why for example, another supermarket (Aldi), it seems are willing to move to Murray Road, away from their current location to Cramer Street, no doubt with the promise of greater exposure, easy car parking access and to a much larger floor area.

As well, there is speculation that Northland is about to embark on an expansion program, increasing retail space and amusement offerings and already have a suite of cinemas.

With this in mind, it would make sense for the Preston Market to remain the point of difference thereby retaining its gritty reputation and capitalising on its known goodwill and reputation.

Indefinite Start/Finish times for staging of construction resulting in shallow assurances for the future of the market.

Cheaper rents in PAM Lane for example, could be an incubator for small business to entice artists and craft people or TAFE students to make value added products with fresh ingredients purchased from other stall holders.

This would be a more authentic, vibrant and a more satisfying experience for all.

PMD through Mr Gobo's Opening Statement and Mr Dimasi bemoaned the fact that the merchandise section of the southern section of market is not thriving, as if that is justification to demolish those sections of the market.

I am no expert in the field, but it's not hard to see the neglect of the southern section with poor lighting and grunginess that it feels less welcoming. In the past the merchandise section was bigger and was more lively and vibrant.

Schedule 1 C37.06 –states:

*“Treatments and measures to ensure that the Preston Market’s traditional retailing style, **ambience** and associated activities are retained”.*

- I. If the market is relocated or radically changed then it cannot be guaranteed that the Preston Market’s traditional retailing style, ambience/interiority, and associated elements like its urban grittiness will be retained and this is a major worry for many, many people.
- II. *We believe that we have a compelling case for the retention and local protection of Preston Market fabric, and that every effort needs to be made to protect the place for so many regular patrons who have a fond attachment and for future generations who otherwise may never experience its authenticity.*

Everybody says how much they love the market; but when questioned, many become a little tongue-tied, unable to pinpoint exactly what the nature of their attachment is. I have chosen the word “essence” to explain this attachment. The word ‘essence’ is **the intrinsic nature or indispensable quality of something, especially something abstract, which determines its character**. The Oxford Dictionary suggests other synonyms such as “soul, spirit and nitty gritty”. Is that the same as

grittiness? Is edge, vibe and authenticity also part of that mix? These are all words that have been used in the discussions about this matter before the committee.

In its current setting, our market has a certain ambience or essence imbedded in the fabric, its spaciousness, its structure, both buildings and its streets and nodes and separate pavilions that provide surprises with every visit.

The market and stall holders welcome people in like we are members of a club and we feel a sense of belonging, of being as one. There is then also a tribal quality to the experience of attending the market and participating in the recurring and essential buying and selling of food and other commodities. For many too it is an outing, perhaps their only outing, where you can shop, haggle then relax and meet friends and family. The continuity of this meeting and exchange process over time combined with both the sense of belonging and enjoying of all the ingredients that make up our market's essence, builds tradition. What we have created over time is a unique Preston Market identity and tradition.

15.0 Our Vision for the Precinct

Recommended changes to the Amendment:

- That the whole market be retained at ground level
- That the whole precinct be reconfigured for urban design, building height, orientation and layout.
- That the precinct house a diverse cross section of our community; be intercultural and intergenerational
- That PM precinct be considered in the bigger picture, including the MAC, not in isolation of its surroundings and that density be redistributed across the MAC.
- That a civic square is located as part of the markets curtilage green open space.
- That Solar Panels be installed above the laneways to provide cheaper power for traders and/or residents
- Consider a design response that is appropriate and sympathetic to the market buildings regarding character, height and scale of new building
- Recognise that the Preston Market is the biggest local enterprise in the MAC and if treated sympathetically, could potentially grow to be bigger and stronger
- Ensure that the key focus of the Market in the provision and delivery of fresh food and produce be recognised, be housed in existing separate pavilions and retain its identity.
- Recognise that part of the essence of retaining the market identity is that fresh food is offered at competitive prices thereby assisting people's cost of living.
- Recognise that the food hall with its diverse specialities is an integral part of the market
- That the market is prevented from becoming pushed to one side, reduced in size and variety and becoming over time increasingly irrelevant and ultimately unviable.
- That no delivery or waste vehicles be permitted to access the inner laneways of the precinct due to noise
- *That no delivery or waste vehicles be permitted to access the inner laneways of the precinct due to noise if the VPA plan is accepted*

-
- *That our preference is recognised for the Built Form for the tallest buildings to be located on the west side of the railway line and on the east side to be located nearest the station, with smaller block sizes stepping down to the north and to the south*