

# A Reply to the Victoria Planning Authority (VPA) Preston Market Proposal 20201

## Glossary of Acronyms and Shortenings

AFCCs	Age Friendly Cities and Communities
HHGL	The WHO housing and health guidelines
The Market/ the market	The Preston Market
Victorian Planning Authority	VPA
The World Health Organization	WHO

## Reply to the Proposal

The following outlines a reply to the proposed Preston Market Precinct development highlighting key areas of concern:

**Density of living and working in the context of Covid-19:** The proposal outlines that 4,500 – 6,000 residents will call an up to 20 storey tower of 2,200 dwellings their home. There is also mention of 1,000 jobs being created and multiple high-rise buildings up to 12 and 16 storeys high being built in the Preston Market precinct for dwellings and office space.<sup>1</sup>

The ongoing Covid-19 pandemic has taught us the importance of built spaces in hindering or fostering health. Human health is often hindered when housing is dense and crowded.<sup>2</sup> In addition to this work environments that are vertical with poor ventilation and no access to fresh air can pose a serious health risk in regards to communicable illness.<sup>3</sup> We are becoming increasingly aware that where there is shared indoor air by a large number of people, airborne viruses can and will spread.

The spread of Covid-19 in the most recent Melbourne lockdown occurred in office buildings and notably within an apartment complex in Southbank, infecting those who lived and worked in separate spaces but shared the same air.<sup>4&5</sup> During Victoria's major Covid-19 wave in 2020, we saw the virus spread indoors in spaces where many people co-habited for long periods of time; schools, hospitals, residential aged care and towers of public housing flats.<sup>6</sup> The proposed density of housing put forth by the Victorian Planning Authority (VPA) is dangerous in this context and ignores that Covid-19 and other communicable illnesses spread where there is density of living and shared indoor air. To this point The WHO housing and health guidelines (HHGL) are relevant as they strongly recommend that crowding be addressed as a top priority when designing homes in order to protect human health.<sup>2</sup>

The virus is still with us in 2021 and the rise of Covid-19 variants sees our future uncertain. We need to build new accommodation and work-space with ventilation, access to open spaces and open windows and access to private spaces isolated away from others in mind.<sup>7&8</sup> Low-rise bungalow or village style accommodation can achieve this, there are also clever ways to design medium-rise buildings with good ventilation and access to fresh air and importantly universal or accessible design offers an approach with features that also combat Covid-19.<sup>9</sup> None of this is addressed in the VDA's current proposal. But we can't afford to ignore the health dangers of dense living and working where indoor air is 'stuffy' and shared by many.<sup>10</sup> Doing so means we will miss the chance to build health into our communities and instead will build risk of illness into the heart of what is currently an open and useful space.

**Takeaway message:** The VPA's proposal should be re-drafted to drastically reduce the density of offices and dwellings proposed at the site in order to prevent crowding as recommended by the WHO.<sup>2</sup> This will work to protect human health and to combat the threat of Covid-19 and future pandemics.<sup>7-10</sup> This will involve thinking about bringing less people into physical spaces and making spaces larger and wider – so the task is two-fold.<sup>7 & 9</sup> The VPA's proposal needs to also address ventilation of indoor spaces and access to fresh air when indoors<sup>8 & 10</sup> and accessible and safe sized spaces for living and working.<sup>9</sup>

### **The proposed high rises and human health and the environment**

The height and density of the proposed housing developments will create significant overshadowing and darkness to the surrounding area that previously received sunlight. This phenomenon has been described as creating an, 'urban canyon' that can block sunlight and possibly impair Vitamin D synthesis and vision.<sup>11</sup> There is also evidence that 'dark cities' created by the kinds of high-heighted buildings proposed by the VPA can also alter people's mood by effecting their circadian rhythm.<sup>12</sup>

The lack of light created by overshadowing can also impact the environment by depriving the plants, animals and insects of the sunlight they need to grow.<sup>11</sup> This could negatively impact the suburban greenspaces around the market including; street trees, backyard gardens and verge gardens and the nearby Preston Oval. Where trees and plants are cast in shadow they grow poorly and may not provide adequate shade, cool the environment and filter carbon dioxide efficiently.<sup>11</sup> In addition to this the shadowing of the surrounding area could increase energy consumption as lighting and heating/cooling is then needed to overcome the poor growth of trees and shadowing.<sup>11</sup>

Darebin is a culturally diverse area with many of its inhabitants being older migrants, a group that has been identified as accessing fruits and vegetables not only from the market but from their own backyards.<sup>13</sup> The overshadowing of the proposed development could impair their ability to grow their own fruits and vegetables in their backyards near the market site and therefore act as a barrier to their access to healthy and culturally appropriate food.

The proposed buildings of a high height can have other negative impacts on the environment and health. There is a danger that the building design will promote wind tunnelling as well as dark and inhospitable spaces both because of the shadowing and the carpark spaces beneath the buildings.<sup>11</sup> This effect and the darkness, loss of green or open space and high density could create an effect that diminishes the sense of safety and community in the precinct and increases crime.<sup>12</sup> The high density of working and living could also create added pollution from car traffic, parking and litter.

**Takeaway message:** Towers of large vertical dwellings, offices and even schools are one way to provide built space for large groups of people. However this comes at the expense of human health due in-part to overshadowing (and crowding due to density as discussed earlier).<sup>11</sup> Overshadowing by towers such as those proposed has been linked to; impaired vitamin D absorption and increased short-sightedness in the population.<sup>11</sup> The overshadowing creates 'urban canyons' which negatively impact the environment by stunting the growth of nearby trees, backyard gardens and other greenspaces.<sup>11</sup> This feeds back to create further negative impacts human health due to reduced greenspaces, increased heat, decreased carbon dioxide filtration and decreased ability to grow food in a shadowed environment.<sup>11-12</sup> Large towers also pose the risk of engulfing the Preston Market site impairing the sense of connectivity, community and safety and causing an increase in crime and local pollution such as littering and vandalism.<sup>12</sup> It is recommended that the VPA drastically reduce the height of all buildings proposed and place a limit that caps the building heights to avoid these negative effects.

### The proposed development disability, older people and the principles of universal design

At the 2016 census 14.2% of people living in Darebin were aged 65 and over.<sup>14</sup> We are due for new Census results in 2021 and it is reasonable to assume, as globally the population ageing, that this number will increase.<sup>15</sup> Global population ageing is accompanied by an increase in people living with a disability or some form of functional impairment.<sup>15</sup> For this reason in the WHO Housing and Health Guidelines (HHGL) it is strongly recommend that housing stock should be accessible to people with functional impairments.<sup>15</sup> Within these guidelines the WHO highlight that poor accessibility to their house puts disabled and older people at risk of injury, stress and isolation.<sup>15</sup> This is pertinent as in many ways Covid-19 has shrunk our world <sup>7</sup> and being socially isolated and physically confined to cramped housing is something the VPA should have considered when planning for the density and size of proposed housing and workspaces.<sup>2 & 9</sup>

The only way that I can see that the VPA has considered accessible design in their proposal is the idea of improved street connections and improved isle widths within the market itself. However key areas of concern include:

- Reorienting and moving the market as this could cause disruption to the sense of familiarity that older people have with their local area.
- Reorienting and moving the market site may create difficulties in wayfinding for those living in the community with dementia and cognitive impairment, there is no mention that the design process has considered wayfinding for this population group.
- I cannot see evidence that accessible or universal <sup>9</sup> or life-time approach <sup>16</sup> design principles were used when creating the new plan for the market. For example there is nothing about; lift access, handrails, ramps, signage at multiple heights etc.

**Takeaway message:** It is suggested that the VPA consider the WHO's Housing and Health Guidelines (HHGL),<sup>2</sup> principles of universal design,<sup>9</sup> principles of accessible design and the 'life-time approach' to its proposed stock housing.<sup>16</sup> Where these principles are applied older people and/or those living with disability or functional impairment will be better able to make use of the market and the proposed housing and offices. It is also suggested that key elements of the design proposed by the VPA might be incongruous to upholding these principles of accessibility. The elements of concern include: relocating the market from its current orientation and location, the height and density of the proposed development of several towers of offices/dwelling as compared to the current open and low-rise Preston Market site.

### The proposed housing - Housing affordability and apartment living in 2021 and beyond

The brochure sent out by the VPA claims that the density and building heights in the proposed design are needed to create affordable homes. However it is not merely building a dwelling that is needed to create homes. If the housing built is not suitable for the people in the community and fails to meet their needs then dwellings are built but homes are not created. For example housing that is insecure, sometimes due to affordability issues, often due to weak security of tenure, is stressful to live in and can create a high turnover of tenants and health harms.<sup>2</sup> Crowding of people and of families in dense and cheap housing is a factor that the WHO has strongly recommended is addressed in the future, at a global scale, to improve human health.<sup>2</sup>

Increasingly younger people and people on low and even middle incomes cannot afford to own a home.<sup>17-18</sup> This sets them up, not as owners of the housing proposed by the VPA but as long or short term tenants<sup>18</sup> and yet the proposal from the VPA does not mention any provision for secure, long term leases for the renters of any of the proposed dwellings. The brochure sent out by the VPA makes much of mentioning affordable housing but does not compare the average income of those in

the area or the income of those on low and middle wages against the ability to get and then service a mortgage for the dwellings proposed.

There also needs to be a consideration of housing in the Pandemic-Era.<sup>9</sup> We have, since the onset of the pandemic in Melbourne in 2020, seen the value of apartments and units plateau or drop, and the demand for any kind of detached housing sky-rocket.<sup>19</sup> This trend has been alleviated somewhat by incentives and low deposit initiatives that help people buy new and off the plan housing.<sup>20</sup> However it's a trend might be long-term as people recognise the value in having the space to work at home, the health benefits of open air and gardens and the added benefits of not sharing indoor air with a large number of people in spaces like internal corridors.<sup>7 & 9</sup> The risk here is that the VPA is proposing the kind of housing that people who have a high level of choice on where to live, will not choose to live in because it does not address their wants or their needs.

**Takeaway message:** Density and building heights should be reconsidered because providing a high volume of housing does not in itself address housing affordability or livability.<sup>9 & 18</sup> Increasingly crowding and dense housing has been shown to cause health harms.<sup>2 & 9</sup> There is some evidence that the density and height of the housing may decrease its value, as people are increasingly deciding to direct their money towards detached dwellings where open space and space to work from home is available.<sup>19</sup> Finally further evidence must be provided as to how the developments are affordable to those on low and middle incomes. In addition to this if the dwellings are to be rented then a plan for security of tenure for renters should be put forth as without it the housing only provides a short term solution to addressing housing needs.

### **The proposed development may impair Preston Market as a space to connect**

The onset of the pandemic has seen people work where they live which has made some suburbs busier on weekdays than Melbourne's CBD.<sup>21</sup> When they leave their homes, the safest way for people to connect is in their local area without the need to commute and come in contact with people on the journey. There is also increased safety in connecting socially in outdoor environments away from shared air.<sup>8 & 10</sup> This means that an open outdoor space like the Preston Market is even more important than it once was. But the VPA proposal does little to leverage this and instead suggests that The Market be physically upended, reoriented and engulfed by a large volume of high buildings.<sup>1</sup>

The Market is a vital source of affordable fruits and vegetables and culturally diverse food. It can be enhanced by keeping it open and connecting it, not to towers, but to open and green space and the public transport and bike paths that already exist around it.<sup>12</sup> The idea put forth by the VPA of connecting the market to the Preston Oval has merit in this regard.<sup>1</sup> Further greenspace could also be provided around pathways and within the current carpark space to connect a series of village or bungalow style, low density and low height buildings that can be used as housing or office space to replace the high density and high height buildings that have been suggested.<sup>9</sup>

**Takeaway message:** Greenspace should be enhanced and be a feature of the proposal and the suggestion of connecting The Market to the Preston Oval has merit.<sup>1</sup> However there is no need to re-orient the market or move it in order to establish this connection. Instead it is suggested that existing pathways be improved to connect the market to the greenspace around it and that new gardens and trees be incorporated into any new proposal. It is also suggested that the density and height of the buildings proposed by the VPA around the market site will diminish the market's connection to the community and greenspaces by making it a crowded and narrow, closed-in space. This will could have a negative impact on the health and wellness of the community who currently use the space to access healthy and culturally diverse food and to connect socially.<sup>7 & 9</sup>

## Reference List

1. Victorian Planning Authority (VPA). 2021. *Preston Market Precinct – What you need to know about the structure plan and draft planning scheme amendment C182DARE*. The Victorian State Government.
2. World Health Organization (WHO). (2018) *WHO Housing and Health Guidelines: Executive Summary*. Available: <https://www.who.int/publications/i/item/9789241550376>
3. Lewis, D. 2021. Why indoor spaces are still prime COVID hotspots. *Nature* 592, 22-25 (2021) Available: <https://www.nature.com/articles/d41586-021-00810-9>
4. The Australian Broadcast Corporation (ABC). 2021. *How the Kings Park Apartment Complex became the 'most active front' in Victoria's COVID-19 outbreak*. Available: <https://www.abc.net.au/news/2021-06-16/southbank-apartment-outbreak-covid-next-steps/100217368>
5. The Australian Broadcast Corporation (ABC). 2021. *Craigieburn shopping centre, Melbourne CBD office building, Docklands supermarket added to COVID-19 exposure sites list*. Available: <https://www.abc.net.au/news/2021-06-05/victoria-exposure-sites-covid-june-5/100192992>
6. The Australian Broadcast Corporation (ABC). 2021. *Anatomy of our battle against COVID-19*. Available: <https://www.abc.net.au/news/2021-01-25/covid-19-spread-through-australia-over-year/13078574>
7. The British Broadcasting Corporation (BBC). BBC Future. H, Constable. 2020. *How do you build a city for a pandemic?* Available: <https://www.bbc.com/future/article/20200424-how-do-you-build-a-city-for-a-pandemic>
8. The Centre for Disease Control (CDC). 2021. *Ventilation in Buildings*. Available: <https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html#considerations>
9. Charles Darwin University. 2021. *COVID-19, future pandemics, and rethinking residential housing design*. Available: <https://news.csu.edu.au/opinion/covid-19,-future-pandemics,-and-rethinking-residential-housing-design>
10. S, Miller. 2020. *How to use ventilation and air filtration to prevent the spread of coronavirus indoors*. The Conversation, Available: <https://theconversation.com/how-to-use-ventilation-and-air-filtration-to-prevent-the-spread-of-coronavirus-indoors-143732>
11. Zielinska-Dabkowska, K.M., & K., Xavia. (2019). Protect our right to light. *Nature* 568, 451-453. Available: <https://www.nature.com/articles/d41586-019-01238-y?sf211597912=1>
12. The British Broadcasting Corporation (BBC). BBC Future. Bond,M. (2017). *The hidden ways that architecture affects how you feel*. Available: <https://www.bbc.com/future/article/20170605-the-psychology-behind-your-citys-design>
13. The Age. (2020). *Those in Poorer Suburbs Don't Eat Enough Fruits and Vegetables, Except for two Postcodes in Melbourne's North*. Available: <https://www.theage.com.au/national/victoria/those-in-poorer-suburbs-don-t-eat-enough-fruit-except-for-two-in-melbourne-s-north-20200205-p53xwr.html>

14. The Australian Bureau of Statistics (ABS). (2016). *Census QuickStats - Darebin*. Available: [https://quickstats.censusdata.abs.gov.au/census\\_services/getproduct/census/2016/quickstat/LGA21890](https://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/quickstat/LGA21890)
15. World Health Organization (WHO). (2020) *Ageing and health - Key Facts*. Available: <https://www.who.int/en/news-room/fact-sheets/detail/ageing-and-health>
16. Saville-Smith K, Saville J. Centre for Research, Evaluation and Social Assessment (CRESA). 2012. *Getting accessible housing: practical approaches to encouraging industry take-up and meeting need*. Report prepared for the New Zealand Ministry of Business, Innovation and Employment. Wellington Available: <https://cresa.co.nz/wp-content/uploads/2017/07/cresa-getting-accessible-housing-october-2012.pdf>
17. The Australian Broadcast Corporation (ABC). (2019). *Housing affordability is a big issue for young people. Here are some unconventional ways to save*. Available: <https://www.abc.net.au/news/2019-10-11/housing-affordability-younger-australians-buying-australia-talks/11549210?nw=0>
18. The Australian Institute of Health and Welfare (AIHW). (2021). *Housing Affordability*. Available: <https://www.aihw.gov.au/reports/australias-welfare/housing-affordability>
19. The Age. 2021. *Melbourne apartment building rates 'to fall off a cliff.'* Available: <https://www.theage.com.au/politics/victoria/melbourne-apartment-building-rates-to-fall-off-a-cliff-20210427-p57mq5.html>
20. The Australian Treasury. 2021. *New guarantees for first home buyers and single parents now available*. Available: <https://ministers.treasury.gov.au/ministers/michael-sukkar-2019/media-releases/new-guarantees-first-home-buyers-and-single-parents>
21. The Australian Broadcast Corporation (ABC). (2020). *COVID-19 pandemic leads to escape from the city to the suburbs*. Available: <https://www.abc.net.au/news/2020-09-15/covid-19-pandemic-leads-to-escape-from-the-city-cbd/12663426>

**From:** [contact@engage.vic.gov.au](mailto:contact@engage.vic.gov.au)  
**To:** [amendments](#)  
**Subject:** Making a submission Form Submission  
**Date:** Tuesday, 13 July 2021 4:57:17 PM



## Making a submission Form Submission

There has been a submission of the form Making a submission through your Engage Victoria website.

**Name**

[REDACTED]

**Postcode**

3072

[REDACTED]

[REDACTED]

**[REDACTED] your submission**

Please find my submission uploaded.

**Upload your submission**

- [FINAL\\_A\\_reply\\_to\\_the\\_preston\\_market\\_proposal\\_human\\_health\\_and\\_enivornment.pdf](#)

**I confirm that I have read and agree to the above conditions for making a submission.**

Yes

**I agree to the Collection Notice**

Yes

To view all of this form's submissions, visit

[https://engage.vic.gov.au/index.php/dashboard/reports/forms\\_new/data/4881](https://engage.vic.gov.au/index.php/dashboard/reports/forms_new/data/4881)

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Engage Victoria. If you think you have been sent this by mistake please contact us at [contact@engage.vic.gov.au](mailto:contact@engage.vic.gov.au).

[Privacy Policy](#) [Log In to Site](#)

Produced by [The State Government of Victoria](#). All rights reserved.



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