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**Subject:** Making a submission Form Submission  
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Thank you for taking the time to read my submission.

I am a Preston resident, who regularly shops at the Preston Market. My submission focusses on two key areas – height and setbacks, and retention of the Market core – as detailed below.

### Height and setbacks:

The proposed 20 storey preferred maximum height is too high (and that isn't even considering that most developers apply for development that exceeds preferred maximums).

I would support a 10 storey preferred maximum, which is more aligned with other developments in the area and the vision in the Darebin Planning Scheme.

It is acknowledged that this site has a role to play in the housing growth of Melbourne as a whole and the City of Darebin. However, 20 storeys would have a negative impact on the local area.

In particular:

- Human scale

The buildings will not create a 'human scale' at the street edge. The 5 metre setback of upper levels above a four storey podium will not create any meaningful recession to upper levels, particularly given their proposed height, or help to create a defined human scale at the street level.

Reducing the height would help to more meaningfully achieve a 'human scale' to the precinct. However, it is also recommended that a '1:1' ratio of building height to setback from the opposite side of the street be adopted for both Cramer Street and Mary Street, being two of the key pedestrian-oriented streets.

Refer to the '[Sydney Road and Upfield Corridor Strategic Framework Plan](#)' for further explanation of the above '1:1' ratio (Urban Design Principal 3.1).

- Sense of community:

Such tall buildings result in apartment buildings that lack a sense of community. Smaller apartment buildings (20-40 apartments) foster communities, which in turn care about their local area.

- Overshadowing:

I support Strategy B19 which states: *no shadowing of Preston City Oval's playing surface between 11am and 2pm at the Winter Solstice and no shadowing of at least 25% of the central key public space within the precinct between 11am and 2pm at the Winter Solstice.*

However, I question whether any testing of the indicative built forms on Figure 5 has occurred to determine whether the proposed 12 storey height in the block fronting Cramer Street is achievable having regard to these aims. While some testing occurred in the Urban

Design Report by Architectus, this only shows a small element of 12 storey form located along the northern boundary of Market Street. This does not align with the extent of possible 12 storey form shown on Figure 5 Built Form and Design Plan in the Structure Plan. From experience, developers rely heavily on built form plans and pay much less attention to the text in a structure plan.

The height and setbacks at Figure 5 should therefore align with the strategy at B19, demonstrated through testing.

The same can be said for the requirements for overshadowing of the key public space in the precinct.

Secondly, it is recommended that a further control be introduced requiring no overshadowing to the southern footpath of Cramer Street between 10am and 2pm at the equinox.

Refer to the '[Sydney Road and Upfield Corridor Strategic Framework Plan](#)' for further rationale for the logic of this control (Urban Design Principal 3.5).

If Cramer Street is truly going to be the 'people street' with Murray Street being the 'transport street', then solar access should be a key priority.

#### **Retention of market:**

Whilst the retention of the vegetable shed outlined in the structure plan documents is positive, the complete reconstruction of the remainder of the market will change its character irrevocably and for the worse.

I can understand the logic in wanting to consolidate the location of the market and provide more direct street access. However, any change to the core of the market will result in it becoming more 'upmarket', which will result in increased rents for market stall holders and translate to higher priced goods. The market will also lose the character that has been built slowly and over time.

Clearly, the current sea of at-grade car parking is an underutilisation of land that can and should accommodate redevelopment. There is also opportunity to enhance pedestrian legibility of the market. However, the core of the market should be retained.

Principally, it is my opinion that the Preston Market should be retained in the area hatched red below, with opportunity to extend the market south to Cramer Street to enhance pedestrian legibility. Buildings of up to 10 storeys on the western side and heights suitable to allow solar access into the market to the north and east would still achieve a substantial densification of the site.



Figure 1: Area of Market that should be retained

However, if the current plan requiring retention of only a small part of the market in-situ goes ahead, then I recommend that the heritage interpretation guidelines be strengthened.

In particular:

- **Strategy B32:** *Redevelopment of the market must meet the requirements of the Preston Market Heritage Design Guidelines.*

This requirement is phrased as mandatory, however the text within the Heritage Design Guidelines themselves are very much discretionary – using the words ‘should’, ‘encourage’ and ‘allow’.

It is recommended that the terminology in this document be strengthened. At a minimum:

- The requirement to retain a representative sample of heritage fabric comprising at least two ‘sheds’ either side of a central walkway should be mandatory.
  - The retention or relocation of existing spaceframe elements should be a requirement, unless a structural report is prepared demonstrating that their relocation is not possible.
  - ‘Other opportunity - 5.1’ on Page 14 of the guidelines report should be incorporated into the design guidelines, allowing stallholders to move directly from their previous tenancy to the new one. This would be critical to ensuring the character of the market is not lost.
- **Strategy B35:** *Ensure daylight access to key pedestrian spaces within the market.*  
This is a very low bar and does not set a specific daylight factor measurement. A daylight factor that will achieve good daylight to these spaces should be set. Additionally, the requirement for solar access to key pedestrian spaces at Strategy B19 should also more explicitly apply to the ‘key market public space’.