

**From:** [REDACTED]  
**To:** [amendments](#)  
**Subject:** Preston Market Submission  
**Date:** Tuesday, 13 July 2021 4:03:24 PM  
**Attachments:** [Preston Market Submission.docx](#)

---

Hi,

I would like to lodge the attached submission regarding the Preston Market development site.

Regards,

[REDACTED]

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

## Intro

The Preston Market site is a controversial development. Any changes to a site that has been central to a community for 50 years is going to be met with challenges, and opposition by the people who hold it most dear. The Preston Market as evidenced by community sentiment, its popularity as a local affordable supplier, is an integral part of the northern suburbs. The market itself is a key cross-city point of interest and is well known across greater Melbourne as a Preston drawcard.

The development of this site is now somewhat out of the community's hands, and whilst development of this site may be concerning, it is also inevitable. What becomes important now is that the community look upon this development as an opportunity, and we seek to encourage a best-practice development that can help meet the needs of a growing community. Sites of this scale and importance are rare and hold the potential to set a new direction for the precinct, suburb and its surrounds.

The Preston Market site needs strong community consultation and exploration of the surrounding context to ensure that the site not only performs its existing function to the best of its abilities, but also meets the ever increasing pressure to deliver new green and open space contributions to meet the needs of the area now, and properly set up the site for a more intensive future. The existing market is not purely about trade, it contributes strong cultural, social and activation measures with a fine-grain character that is difficult to emulate in new-builds. This is acknowledged by the structure plan which shows a positive, sensitive vision and intention for the site.

## Proposal Summary:

The Preston Market draft structure plan developed by the VPA shows a good understanding of the existing market, its character and the nuanced challenges that must be considered to retain the strong sense of community that is irreplaceable.

The proposal seeks to develop a strategic outlook that can achieve the following guiding principles:

- A thriving fresh food market
- A diversity of land uses and vibrant amenity
- Culturally diverse character and adaptable community spaces
- Sustainable, liveable and accessible precinct
- Flexible and efficient car parking and access.

These principles are positive and show that the VPA are very interested in the success of the site and understand the importance of getting this development right. This submission seeks to acknowledge the good intentions for the site, but also address some of the potential pit-falls, gaps, or holes that may allow good intentions to be interpreted in a way that could result in poor outcomes. The proposal for the site also shows sound understanding of the constructability issues with clear consideration of staging and phasing to ensure market operations can continue with minimal interruption.

The power of the structure plan is that it allows the subsequent delivery focused phases a strong framework within which to operate, and ultimately has the potential to set up the entire precinct for a positive, thriving future. This structure plan describes a number of strategies and guiding principles that display deep understanding of what it takes for this development to be a success – the issue within the document is that this deep understanding is informing a series of guidance based intentions rather than asserting more measurable, tangible, and outcome focused initiatives that

could help secure a positive outcome from the outset – for example, the use of the word ‘should’ as opposed to ‘must’ is an opening for the built outcome to be significantly different from the intentions of the structure plan.

## Open Space:

### Site Provision

The proposal references the capacity of the site to meet the existing market functions with the addition of a multitude of other functions. The site is projected to add 4500 – 6000 people. This will bring extra strain to a precinct that is already considered undersupplied against relative local benchmarks for unencumbered open space and green spaces. The suburb and sub-precinct of Preston Central is distinctly lacking in open space, the significant additional residents to the site will further expose this undersupply, which will be further highlighted, and particularly valuable for residents in apartment style living.

The proposal states an additional 2800m<sup>2</sup> of open space provision, which reflects approximately 5-6% which is lower than existing supply. This value for a significant, 5.1ha site, is a missed opportunity for genuine positive provision that could address some of the typical measures that inform a ‘liveable’ city. This submission will not go into detail to highlight the social, environmental, cultural, and economic value of open spaces and green spaces for communities, as this is well understood by the VPA – but it should be noted that sites of this scale are rare opportunities to have significant impact on provision for the community, and if these values are not strongly reflected in this type of proposal, then there little chance that these typical targets being met by any other developments in the local area.

The proposal references a 10% Open space provision including development contributions. New development of this significance should seek to meet and exceed the benchmarks, targets, and aspirations of the various relevant bodies to ensure we are making steps towards a positive future. The structure plan notes that the 10% provision will be made up by open space and cash contributions. This should not be considered – all open space contributions for a site of this significance should be physical.

- 10% open space contributions should be provided as physical space, not as cash contributions.
- ‘The market should also have a visual sonnection to Murray Road’ does not adequately reflect how important this aspect is for activation, and commercial success of the proposed market development. If this space creates a strong connection between Murray and Cramer Street, then it will see increased foot-traffic, and will be able to compete with adjacent multinational outlets. This connectivity should be provided through a connected, north facing public space.

### Types of Open Space

The types, and diversity of open space are integral to a successful development in a complex, highly constrained context. The document displays a series of open space types and intents. Spaces of various scales are discussed, but do not go further to discuss space typologies and the significant pressures that these open spaces must deal with. The structure plan should seek to give detail about space types and consider the following:

- Spatial provision must be commensurate with function and expectations of community uses.

- Informal social spaces should be supplied to address community needs and the intent for a thriving cultural hub.
- Informal / passive recreation spaces should be provided to address significant undersupply within Preston Central.
- Residential needs and desires post-coronavirus are important and informs why open space contributions in cash form should not be considered. People have become much more conscious of the role of open space. The supply of residence for an additional 4500-6000 people without adequate open space will create poor living conditions and increase pressure on the surrounding neighbourhoods.

### Private Open space

Whilst not accessible and open for use by the public, private open space can lend it's positive characteristics and attributes to the surrounding area. The softscape opportunities within private open space has the capacity to increase tree canopy coverage and green outlook for an improved character for the general surrounds. In Urban areas such as Preston, dominated by hard surfaces, the use of soft landscape features on podiums, and rooftops becomes even more important. The document describes an intention for 'A sustainable, liveable and accessible precinct' – this should move beyond an intention and provide minimum, measurable targets to ensure that this intention can be achieved. The precinct structure plan should have stipulations upon the potential developers to ensure that the vision as set out in the document will be met including minimum tree canopy coverage for the site with reference to either Darebin City council targets, or City of Melbourne targets.

- support opportunities for integrating environmentally sustainable design (integrated water management, urban greening, etc) with development of the site. This can be supported by private open spaces.

### Built Form

There are a range of built-form intentions that are well considered and thought through in the proposal, which reflects a long history and understanding of built-form setbacks, podiums and height restrictions to ensure existing open spaces are not overshadowed, and consequentially encumbered. These are very positive, strong requirements of the structure plan. However, this submission considers the effect of the potential full build-out may have on the proposed open spaces and market. The document proposes an expectation for further breakdown of development parcels is expected, but is not explicitly required – The document should consider providing this further breakdown at the early phases of the project to set up the ground level open spaces and activation areas for success into the future. Environmental conditions and comfort are key to any successful open space, and without physical comfort, these spaces will not be activated.

- Murray Road setback is positive for street-wall experience as described, but further consideration should be placed on the provision of north facing green open space to improve the Murray Road environment, and activation of the market frontage.
- Overshadowing modelling should be produced prior to further community consultation.
- Implementation strategy, planning scheme amendments should be produced prior to further community consultation.
- Step-down to Cramer Street is a positive outcome, but also puts 'key open spaces', and 'secondary open spaces' on the interior of the surrounding built-form.

- Step-down to Cramer Street (people street) should be further broken down by VPA to ensure separated towers for increased natural light and an increased target% of daily solar access.
- The proposal should refer to 'natural light' or 'solar access' as opposed to terms such as 'light' and 'airey' that elude to positive natural assets but could be interpreted differently.
- L15 on page 25 should be written to have statutory weight and a measurable outcome.
- It is unclear in the document if the primary and secondary pedestrian connections will be included as public space for the minimum dimensional requirements stated in L21.
- L24 and it's inferred public space should meet a higher benchmark than 25% solar access on the winter solstice to ensure activation and the intent for 'a welcoming public space' can be met.
- Section 6.3 state 'taller buildings to be located in the north...' Whilst this is universally understood in practice as a good move for maintaining solar access and reducing overshadowing, further interrogation of diversity of heights within the 3 blocks outlined in figure 5 and smaller building parcels would allow for duration of overshadowing to be minimised.
- B20 'should help maintain human scale'. This is open ended and does not reflect the nuance and attention to the finer grain operations and diversity of spaces that are required. Some spaces that reflect high intensity activation like the existing semi outdoor 'food-hall' of the existing market could be used as precedent to create highly-activated lanes within the precinct that do not demand large quantities of space, but provide significant contributions to culture.

### Legibility, Connectivity and Prominence

There are a number of key connectivity, circulatory and access consideration and principles that are not reflected within the layout of the proposal. This appears to be by virtue of the existing desire-lines and constraints of site. Key areas of activation, livability and amenity for pedestrian environments and improved user experience is the overall legibility and ease of navigation. The proposal shows a number of small moves within figure4 that could be better integrated into the proposal to inform a better outcome – this could require property acquisition, but would provide opportunity for significant improved to site circulation and the maintenance of the physical prominence of the existing market.

- Mary Lane existing is largely sticking to its existing poor layout, with kinks and turns that create poor, unpredictable traffic movements. Consider property acquisition of adjacent buildings to provide clear, direct traffic movements, sightlines, and pedestrian movements along Mary lane which would in-turn give prominence to the Market.
- 'Transport Street' does not propose any cycling infrastructure which is currently lacking. The continuation of Murray Road both east-west provides for single lane bi-directional traffic. The market site is the only section that provides 2 lanes. With the level crossing removal occurring, this may reduce congestion to a point where cycling facilities can be accommodated – this would provide active transport connections and better market access for the northern neighbourhoods that Murray Road is currently a barrier to.
- The notion of a transport street and people street, whilst potentially positive should not be at the total sacrifice of any transport mode.
- The plan currently shows no intention for public space to Murray Road which currently has very little respite from intensive traffic.
- Property acquisitions would give the market site more prominence and address to both Murray Road and Cramer street. The acquisition could be maintained as public open space

which would provide a space that has genuine solar access year-round, which is currently not reflected in the plan.

- Proposed market location and references to 'open, light, and airy' spaces will be difficult to achieve with market being flanked by existing building and proposed mixed use development over the top of the northern and western edges of the proposed footprint.
- There should be provision of 2 primary pedestrian connections that are generous, activated promenades that will build upon and support High street activation.
- 6.3.1 B6 should be written to inform measurable outcomes. The intent of high visibility and address of the market to Murray Road does not appear to be met by the plan. The current proposal removes market prominence through placement behind existing buildings, and new developments. The existing market is currently visible through a 21m wide cross section of Mary Street and a continuous line of sight for 100m from the rail-line moving east. This furthers the point for a direct public space interface with Murray Road which will in-turn allow better commercial competition with national supermarket chains and will improve safety and CPTED conditions. If acquisitions are not possible, further consideration should be given to stretching the market frontage to Murray Road.

## Conclusion

The areas that are vital to the success of our urban realm are in the detail of documents such as this. The detailed arrangement of spaces and requirements for open spaces is what allows for the futureproofing for good design outcomes in subsequent phases of a project of this scale. There are clearly a number of spatial, functional and arrangement constraints that inform the ultimate outcome for the site, but further interrogation in the early planning phases is the opportunity to carve out spaces that can cater for future population densities, community functions and liveability. The best opportunity to do this is through significant physical open space contributions.

The structure plan and ultimate proposal for the site has the intention and vision to create a positive legacy for Preston, its surrounding suburbs and the city. This type of site and this opportunity come around very infrequently, and hold the potential to set our city in a new direction and provide strong liveability for its residences and the surrounding community that lean on this site as its anchor for social connection. The structure plan seeks to 'deliver high quality Architecture and Urban Design in the precinct which respects the honest, functional and authentic use of space'. This structure plan has the capacity to set out the foundations to ensure that these intentions are met. There are a series of negotiables that should be addressed to avoid alternate interpretations that may allow this vision to be diluted into a missed opportunity for the community – this is the chance to give the precinct the right structure to build upon into the future.