

Royal Historical Society of Victoria
Queen Victoria Market Development:
Submission to Heritage Victoria

Reference VHR0734 Queen Victoria Market,
Permit Application Number P27642

23 October 2017

Victorian Heritage Register, Statement of Significance, Queen Victoria Market

The Queen Victoria Market is of social significance for its ongoing role and continued popularity as a fresh meat and vegetable market, shopping and meeting place for Victorians and visitors alike. The Queen Victoria Market is of architectural significance for its remarkably intact collection of purpose built nineteenth and early twentieth century market buildings, which demonstrate the largely utilitarian style adopted for historic market places.

Burra Charter 3.1

Conservation is based on a respect for the existing fabric, use, associations and meanings. It requires a cautious approach of changing as much as necessary but as little as possible.

Introduction

In preparing this submission, the Society has relied upon published documents of the City of Melbourne and upon extensive discussions with Council officers, in particular Amy Lees, Angela Hill and Sebastian Costantino, as well as Kate Gray, Principal, Heritage, Lovell Chen. We express our thanks for their aid.

The Royal Historical Society of Victoria functions both as the peak body for 340 local history societies and as the local historical society for the central city area. In the first capacity, the RHSV seeks to support the conservation of valuable built heritage across the state. In the second, the Society seeks to preserve the remaining heritage of the City. Thus the RHSV is doubly a stakeholder in discussions concerning the redevelopment of the Queen Victoria Market (QVM), the largest and most significant heritage precinct in the City.

This submission is in three parts: 1) Extent of the destruction of heritage proposed under the application; 2) Evaluating justifications of proposed destruction of material heritage; and 3) Risks to the market's social heritage significance.

1) Extent of the destruction of heritage proposed under the application

The RHSV approves of Council's plans for restoration of deteriorating historic fabric. Preservation of this fabric should be the driver of any plans to enhance the market.

The CoM proposes, however, not only to restore existing heritage, but to build five major intrusions into the Victorian fabric of the market. The RHSV submits that the total effect of these intrusions would be enormously detrimental to the heritage aspect of the market sheds. For the following discussion, see illustration 1, below.

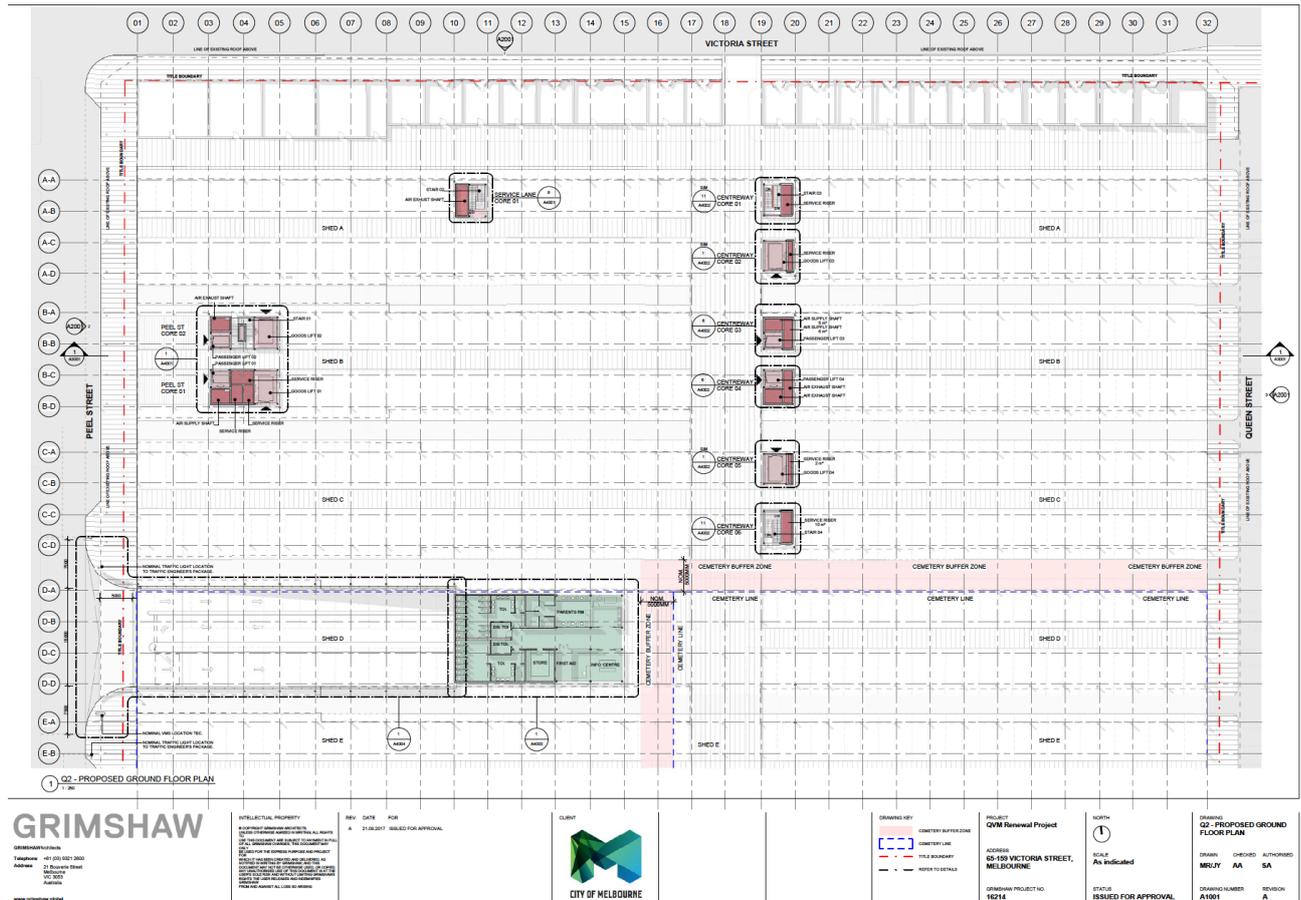


Illustration 1: Grimshaw, Drawing Q2 – Proposed Ground Floor Plan, Drawing Number A1001,

The intrusions are:

1. Construction of two large Service and Lift Access Cores presenting as a unified whole, in Shed B, at the Peel Street end of the proposed new basement car park (see illustration 2 below). This unified block will extend floor to roof (indeed it will go through the roof) and across the entire width of Shed B.
 2. Construction of six lifts and stairwells (Centreway Cores 1, 2, 3, 4, 5 and 6) in Sheds A, B and C, at the eastern end of the basement, of similar design and similarly extending from floor through roof. While each core is of somewhat smaller width than the Peel Street Cores, Centreway Cores 2-5 are unified into a whole through glazed rooves/canopies.
 3. Construction of a stair and air shaft (Servicelane Core 1) in Shed A on the northern side of the basement. This does not appear to be as intrusive as A and B above (we have not seen an elevation).
 4. Complete rebuild of Shed D from Peel Street to just short of the centreway dividing the eastern and western halves of Sheds A-D, in order to construct:
 - 4.1. A three-lane vehicular access from Peel Street to the proposed basement car park. This will require not only raising the heritage roof at Peel Street, but also widening the Shed itself, moving the edge pillars outward by approximately 500mm on each side and building an entirely new canopy. Given the grade required to accommodate 12½ ton trucks for the six large traders, this access will be very bulky (again, we have not seen an elevation);
 - 4.2. A new amenities and visitor information block (see illustration 3 below).
- 4.1 and 4.2 together will bulk large across half of Shed D and will eliminate that half of Shed D from trading.



Illustration 2: Proposed Peel Street Service and Lift Access Cores (Source: CoM)

Proposed customer amenities and visitor information

Credit: Grimshaw Airc



Illustration 3: Proposed Customer Amenities and Visitor Information Block (Source: CoM)

Taken together, these intrusions constitute a massive assault on the integrity of the heritage design. The QVM sheds are characterised by rhythmic repetition of a simple, open design. While at ground level the eye is caught up in the multitude of stalls, shoppers and vehicles from carts to vans, above this is the rhythm of repeated pillars and umbrella style supports for the rooves. These are, to be sure, obscured at present by the deterioration of many elements, which reduces visual similarities, but with restoration of the building fabric that rhythm will be apparent.

All the changes proposed block that rhythm. In some cases, the designs are acceptable in their own right. The committee praised the clean, Scandinavian design of the Proposed Peel Street Service and Lift Access Cores, which would suit a sauna in a rural environment. Here, however, this will block an open vista onto Peel Street which is characteristic of the Victorian design. We were told that the extensive use of glazing would make these cores transparent. But there is extensive use of timber and glass is naturally reflective. Moreover, transparency through the glazing involves four layers of very thick glass (the exterior of the structure at each end plus the sides of the lift or stair). These cores will be massive disruptions to the visual play of columns and supports.

In other cases, the designs are less acceptable. The committee found the Proposed Customer Amenities and Visitor Information Block to be extremely intrusive and bulky. Together with the three-lane access, this will clutter half of Shed D, closing the hitherto open vista southwards from the sheds.

Most importantly, the six linked cores (Centreway 1-6) will block Sheds A, B and C right in the middle. A visitor to the market walking in these sheds—the heart of the market—will be faced to the south with the blank wall covering the vehicle access under Shed D, and to the east and west with floor to ceiling lift wells. This makes a massive change from the current openness on these three sides.

A further change which has not been acknowledged is that these intrusions will significantly reduce trading space in Sheds A-D. Not only will these intrusions eliminate half of Shed D as trading space, but also they will cut a number of stall spaces at the Peel Street end of Shed B and at the centreway end of Sheds A, B and C. This loss in trading space is nowhere acknowledged in the proposals.

All four Sheds (A-D) will suffer massive intrusion under the CoM proposal. The citation for the QVM reads, in part: “The Queen Victoria Market is of architectural significance for its remarkably intact collection of purpose built nineteenth and early twentieth century market buildings.” If one considers the impact of the whole of what is proposed, one must admit that the result will no longer be an “intact collection of purpose built ... market buildings.” Is such a loss of heritage fabric justified by the need to make changes to preserve that fabric or what then remains of it?

2) Evaluating justifications of proposed destruction of material heritage

The RHSV takes as its starting point article 3.1 of the Burra Charter: “Conservation is based on a respect for the existing fabric, use, associations and meanings. It requires a cautious approach of changing as much as necessary but as little as possible.” The justifications offered for the redevelopment are not based on preservation of the existing fabric, but on a purported need to modernise the market, to make it profitable. It is admitted that “revenue has steadily increased,” but it is argued nevertheless that “the profitability of Queen Victoria Market Pty Ltd has declined.”¹ In fact, the decline in profitability followed the City’s privatisation of the market,

¹ *Queen Victoria Market Precinct Renewal Program Business Case* (City of Melbourne, June 2017), p. 7.

when it formed Queen Victoria Market Pty Ltd. An examination and analysis of how the market has been managed would be necessary before one could conclude that the problem is the absence of modern facilities.

More fundamentally, is the profitability of the private company formed to run a public asset a sufficient justification for such infringement of the market's heritage values? This hardly constitutes financial hardship for the owner. Whether one agrees in principle or not, it is clear that the driver of the redevelopment has been profit, not preservation. Indeed, in 2015, the stated purpose was not preservation but "A brighter, lighter, cleaner, greener and more pleasant environment that is clearly historic, yet subtly contemporary."²

The shifting rationale for the redevelopment bears this out. Since the beginning of the project, the Lord Mayor and others have argued that the fundamental need is access to refrigeration. Now Council officers speak of "relocating cool rooms from Franklin Street to the new basement," thus admitting that refrigeration was always available. (Whether or not a daily fresh food market requires refrigeration is a different question.) The change now is that refrigeration will be available underground via lifts. The main justification for the excavation has evaporated and one wonders whether access via lifts will be easier or faster than access down Queen Street.

Similarly, in 2015, the aim was to "reduce servicing intrusions in public areas," that is to conceal the vehicles and transform the informal nature of the stalls into neat, modern stalls without vans and cars behind them.³ "Many traders' vehicles are now present within the market sheds during trading hours due to the lack of facilities for delivery and loading of goods and produce. New infrastructure will eliminate this necessity."⁴

Now, in 2017, the Heritage Impact Statement argues that the "relocation underground of those activities that require substantial infrastructure or are related to storage, management of waste and the like will not detract from the experience of a working market."⁵ And, in answer to the question, "will traders have the option of driving their van to their stall as they do now or of driving it to the underground area and working from there?", Council officer Amy Lees asserted they would, adding in an email that "the details of how the service lanes and the below ground operational areas are used will be primarily determined through operational decisions by management and traders. Q2 proposed design allows for this operational flexibility."⁶ The retail plan, however, still speaks of "separation of vehicles from public areas."⁷

If traders do have the choice of driving their vans to their stalls and unloading on the spot, why would they bother to drive underground, unload their set-up and their goods onto forklifts, drive to the lift, wait for the lift, and then drive to their stalls? So why bother to excavate? If traders do not have the choice but must drive underground and unload from there, how will "the experience of a working market" be maintained?

The main driver of the excavation is the six large traders who use 12½ ton trucks. It is for them that the access road in Shed D has to be so wide. It is for them that there will be special loading bay for 12½ ton trucks. None of this is of use to the other 650 traders, who use vans, cars and utes to bring their goods and set up.

² *Precinct Renewal Master Plan* (approved MCC 28 July 2015), p. 16.

³ *Ibid.*, p. 32.

⁴ *Ibid.*, p. 7.

⁵ Lovell Chen, *Queen Victoria Market HO734, Heritage Impact Statement* (September 2017), p. 52.

⁶ Email, Amy Lees to Charles Sowerwine, 20 October 2017.

⁷ *Melbourne's Marketplace Retail Plan*, May 2017, p. 31.

It is difficult to understate the enormity of this change in rationale. First refrigeration, then concealment, and, finally, meeting 21st Century rules and regulations have been raised to justify the excavation, but this is at best a drastic solution to health and safety and waste management considerations. Indeed, one can ask if it is a solution. The basement will incorporate “a large waste facility—to accommodate waste separation and recycling facility.” But is putting these facilities below ground, with access only via lifts or via an external roadway (Peel Street), an effective solution to these problems? Indeed, why does this facility have to be on site? Nothing in the various reports explains the issues in any substance.

The fundamental purposes of the project were identified in 2015 as “Parking, Heritage, [and] Open Hours.”⁸ The 2017 *Retail Plan* noted the top five *desiderata* named by respondents to a 2013 Customer Research Survey as “longer hours, more seating, more variety, more parking, and cheaper parking.”⁹ The RHSV believes that these are valid aims and supports efforts to realise these aims, so long as they do not threaten the heritage value of the market. But, curiously, the Council plan does not address any of these aims. Excavation of the basement is irrelevant to all five *desiderata*. “Longer hours” and “more variety” can be achieved without any physical alterations to the existing material fabric. “More seating” can be achieved without altering a single stall.

Most frustrating is the call for “more parking” and “cheaper parking,” for the proposal does not increase parking. It is difficult to make an exact count and one wonders if Council are being deliberately coy, but it is clear that the result of this enormous investment may well represent a slight decrease in parking. The page in the 2017 *Retail Plan* devoted to “Marketplace Parking Requirements” makes no mention whatsoever of parking facilities under the CoM plans. In a discussion of Quarter 2, the report mentions “below ground customer car parking with a capacity of up to 290 vehicles.” “Up to” presumably reflects the fact that trader’s vehicles will take up some of that capacity. In addition to the below ground parking, some 400 to 500 spaces are foreseen in the Munro site development. That makes a total of 690-790 parking spaces, less those used by traders, as opposed to an estimated 800 at present.¹⁰

We believe that the damage to heritage has not been justified in the documentation provided. We can accept, in the words of the Burra Charter, “changing as much as necessary,” but the necessity has not been shown. On the contrary, the current proposal is an answer waiting for a question. Until clear and precise needs are outlined and relevant solutions proposed, we believe that Heritage Victoria should refuse the permit, following the further words of the Charter, changing “as little as possible.”

3) Risks to the market’s social heritage significance

In the words of the citation, “The Queen Victoria Market is of social significance for its ongoing role and continued popularity as a fresh meat and vegetable market, shopping and meeting place for Victorians and visitors alike.” Its social significance is an essential part of its heritage value. To enhance this value and to preserve the market, we need to go back to the beginning and consider what is reasonably required to keep the market intact for the future.

The RHSV notes that the Retail Plan acknowledges that “the market also perpetuates distinctive forms of trading which have their origin in nineteenth century practices.”¹¹ We endorse that

⁸ *Precinct Renewal Master Plan*, p. 7.

⁹ *Melbourne’s Marketplace Retail Plan*, p. 17, from “Queen Victoria Market Customer Research, Sweeney, May 2013.”

¹⁰ *Ibid.*, pp. 33, 38.

¹¹ *Ibid.*, p. 12

acknowledgement. We suggest that attempts to modernise the market and to bring it into conformity with current regulations need to be balanced with the need to maintain the retail practices that endear the market to visitors today.

The proposal, however, despite repeated iterations, still involves concealing market practices. The Retail Plan states that “Market traders will have the option of fixed stalls.”¹² The option? It is unlikely that fixed stalls can be built for some traders while others still have “the option of driving their van to their stall as they do now.” In the end, fixed stalls seem likely to be the norm and the market’s social principles will be lost.

People do not come to the QVM in search of a modern, hygienic environment, “a brighter, lighter, cleaner, greener and more pleasant environment that is clearly historic, yet subtly contemporary.”¹³ There is no shortage of modern environments. People come for the atmosphere, the workings of an open-air market, the original nineteenth-century prototype of today’s farmer’s markets. The proposal acknowledges this but constantly betrays its original and still fundamental aim: to “reduce servicing intrusions in public areas.”¹⁴

On this ground too, Heritage Victoria should refuse the permit.

Conclusion

The RHSV fully supports the restoration work outlined in the various documents, but objects strenuously to the alteration of so much of the historic fabric of Sheds A-D and to the loss of the market’s social significance. In the absence of any clear justification for allowing so much historic fabric to be altered and/or cluttered with inappropriate and unnecessary structures, the RHSV strongly urges Heritage Victoria to reject the application.

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approved by Council, 24 October 2017.

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¹² Ibid., p. 38.

¹³ *Precinct Renewal Master Plan*, p. 16.

¹⁴ Ibid., p. 32.