

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

Reference VHR0734 Queen Victoria Market,
Permit Application Number P32629 (Northern Shed)

Note: This submission concerns the permit application for the proposed 'Northern Shed'. As we argue below, that application must be considered in the context of the whole programme of market 'renewal', which the Council refers to as Option A. Our approach here parallels the structure and content of the CoM's report in that the first two parts of this submission from the RHSV on the Northern Shed' are similar to parts of our other submission concerning the permit application for the proposed 'Trader Shed' (P30767). However, this submission omits detailed discussion of storage and includes an additional discussion of waste management in 1.2, renamed 'Loading, Safety and Waste Management'.

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.

People's Panel Recommendation

The key driving significance of the Market is its ongoing use as a well-maintained traditional, open-air market, engaging in the sale of fresh fruit and vegetables, dairy, fish, meat and general merchandise.

The cultural heritage significance of the market should be emphasised and celebrated as a major attraction, building on its international reputation as a major feature and tourist attraction for Melbourne.

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.

Québec Declaration on the Preservation of the Spirit of Place

Spirit of place is defined as the tangible (buildings, sites, landscapes, routes, objects) and the intangible elements (memories, narratives, written documents, rituals, festivals, traditional knowledge, values, textures, colors, odors, etc.), that is to say the physical and the spiritual elements that give meaning, value, emotion and mystery to place. Rather than separate spirit from place, the intangible from the tangible, and consider them as opposed to each other, we have investigated the many ways in which the two interact and mutually construct one another.

Introduction

The Royal Historical Society of Victoria functions both as the peak body for 340 local history societies and as the historical society for central Melbourne. In the first capacity, the RHSV seeks to support the conservation of heritage across the state, including its capital city Melbourne. In the second, the Society seeks to preserve the remaining heritage of the city itself. In both capacities, the RHSV has been a partner and a stakeholder with the city's governing authority, the City of Melbourne, since the society's inception in 1909. Thus the RHSV is doubly a stakeholder in discussions concerning the redevelopment of the Queen Victoria Market (QVM), arguably the most significant heritage precinct in the city.

This submission is in three parts:

- 1) Section 1 considers the destructive impact of the CoM 'renewal programme'—Option A, of which the proposed 'Northern Shed' is one of four interlocking elements—on the market's intangible social value 'for its ongoing role and continued popularity as a fresh meat and vegetable market' (VHR Citation);
- 2) Section 2 analyses the 'Economic Justification', pointing to its misleading nature and the agenda it hides; and
- 3) Section 3 discusses the architectural and aesthetic issues posed by the proposed 'Northern Shed', suggesting that it would pose a serious threat to the 'architectural significance [of the market's] remarkably intact collection of purpose built nineteenth and early twentieth century market buildings'.

1) Option A ('renewal' programme) threatens the market's social value

The Report of the Future Melbourne (Major Projects) Committee of 17 September 2019 sets out the key components of Option A¹:

- Former G Shed (Trader Shed)—new undercover, segregated and controlled loading docks for traders secure climate controlled trader storage, waste management facilities for Meat, Fish and Dairy Produce Halls, dedicated trader amenities including toilets, showers, lunch room, meeting rooms and lockers and public toilets and parents room.
- Queen Street North (Northern Shed)—centralised waste and recycling facilities, new undercover, segregated and controlled loading docks for fruit and vegetable traders, multiuse space dedicated for trader deliveries and later converting to a public space for customers and visitors with integrated street furniture.
- Point of Sale (POS) storage in Sheds A, B, H & I—purpose built storage and refrigeration within fresh produce traders' stalls.
- Queen's Corner Building—24 hour loading docks, dedicated storage for Queen Victoria Market Pty Ltd (the Company) operations and events, security control room, public amenities, including a Changing Places accessible toilet, and retail to activate the future public space.

¹ Quoted by Trethowan Architecture in 'Heritage Impact Statement' Submission to heritage Victoria Page 4

1.1 Option A and the market's social value

The proposed 'Northern Shed' must be considered in the light of the whole programme of market 'renewal'—Option A—of the Northern Shed' is but one of four interlocking aspects. Of the four components of Option A, only two are currently before Heritage Victoria, but it is incumbent on Heritage Victoria to consider the whole. Consideration of the heritage and architectural issues posed by the Queen's Corner Building will to be sure await submission of plans, but we believe its purpose, like that of the other three components of Option A, is to provide facilities that will radically alter the way the market has operated for over 140 years. Option A, in short, seeks to attain the same transformation of the market as the discredited Doyle Plan, for which Heritage Victoria has already refused a permit. In this context we do not think the current permit applications for the Northern Shed and the Trader Shed should be considered before the whole renewal proposal, including the Queens Building, point of sale storage, Market Square (the existing carpark), and the Franklin Street Stores has been completed and presented to Heritage Victoria.

Option A would serve to shift traders from their traditional mode of operation—bringing their produce to their stalls and operating from their vans—to force them into a new mode—unloading their produce at loading docks, transporting their produce to their stalls by some unspecified means (electric trolleys have been mentioned at briefings), and operating from uniform, semi-fixed stall counters, whose aim is disguised by their being called 'Point of Sale (POS) storage'.² Visuals of this 'Point of Sale storage' presented to the People's Panel show that they are in fact uniform, stainless steel counters.

This transformation of the market threatens all that currently attracts visitors to the market. Together with the Queen's Corner Building (for which approval has yet to be sought), the proposed 'Trader Shed' and 'Northern Shed' both contain loading docks. The three buildings also contain extensive storage, far beyond what traders have sought, and a wide range of facilities that will only be useful if the market shifts to a more value-added model (read fast food), employing many more wage workers instead of family operations. The enormous volume required for all this means that to accommodate them much bulkier structures are required, thus compromising design principles. We will address this issue below.

Preservation involves more than the physical remnants of the past. Preservation involves the things that attach people to place, the intangible aspects that preservationists call the 'spirit of place'. ICOMOS (the International Council on Monuments and Sites), meeting in Quebec in 2008, defined 'spirit of place' as 'the intangible elements', 'the physical and the spiritual elements that give meaning, value, emotion and mystery to place'.³

Based on the pioneering work of Chris Johnston,⁴ the Heritage Council of Victoria has recently acknowledged the importance of social or intangible value, defining it as 'the idea that places and objects are invested with meaning by communities through communal interaction over time'.⁵ It has now been added as a criterion for registration: 'strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons'.

² Whether or not this element of the proposed 'renewal' requires a permit is in itself a major question. Council will no doubt argue that the POS/stalls are removable by forklift and thus do not require a permit. We emphatically submit that they must require a permit, because they would represent a radical change in the way the market functions and thus irrevocably alter the experience or spirit of the place.

³ *Québec Declaration on the Preservation of the Spirit of Place*, Adopted at Québec, Canada, October 4th 2008, p. 2.

⁴ Chris Johnston, 'What is Social Value? A Discussion Paper' (Canberra: Australian Government Publishing Service, 1992).

⁵ Heritage Council Victoria, 'Guidance on identifying places and objects of state-level social value in Victoria', 4 April 2019.

The Queen Victoria Market's social value is an important reason that it was listed on the Victorian Heritage Register: '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'. This citation was written long before social value had been formally incorporated as a criterion; that it was nevertheless included shows how widely that social value was already recognised.

To understand the market's social value, we point to an excellent report commissioned by Melbourne City Council in 2017, 'Queen Victoria Market: Intangible Values', which highlighted that 'the most common anxiety was around the Market being "cleaned up" or "sanitised" ... made to look like a "food hall" rather than a "working site"'. This it was feared would 'diminish the experience of being there'.⁶ Above all, the report found, visitors to the market value its movement. 'Constant movement is central to the feel of the site, so changes to it will be interpreted as changes to atmosphere'.⁷ The report explained:

*The Market never stops moving. Movement was crucial to how shoppers and visitors perceived the goods, produce, environments and other people at the site ... This was comprised of many different elements: a mix of adults and children of different physical abilities and habits; cars, trucks and forklifts; trolleys, prams and scooters; bins and boxes; and other aspects.*⁸

The intangible or social values established by this report are an essential part of the market's heritage value. The market operates today in a way similar to when it began operation in 1878. Stallholders bring goods to their stalls in their vehicles, set up their stalls and operate from their vehicles. The shift to central distribution and, especially, uniform fixed stalls in place of the current beloved hodgepodge goes completely against what is valued in the Market.

*For regular shoppers and traders, the future of the Market is closely associated with anxieties about something being "lost" or "taken away" when the market is redeveloped, particularly around the refurbishment of the sheds' structure and changes to how goods are delivered or displayed. This is often expressed in terms of the Market being "sanitised" or made to look like a "food hall" rather than a "working site" (Key Insights 1 and 3).*⁹

The CoM plan has always been and remains to eliminate this characteristic movement, to create 'a brighter, lighter, cleaner, greener and more pleasant environment that is clearly historic, yet subtly contemporary'.¹⁰ But that's not what people come to the QVM for. They come for the atmosphere generated by the way the market operates, by the gritty reality of unpackaged foodstuffs, by the handling and movement of goods, by the theatre of a working market in which they become participants. They come for its social value.

The People's Panel, in which two representatives of the RHSV Heritage Committee participated, noted that 'any program of restoration and renewal should preserve and maintain the social and

⁶ Shanti Sumartojo, Joanne Mihelcic, Nicholas Walton-Healey, Bianca Vallentine, [and] Sarah Pink, *Queen Victoria Market: Intangible Values* (Final Report Prepared for the City of Melbourne and the Queen Victoria Market Pty Ltd; Melbourne: digital ethnography research centre, RMIT University, September 2017), pp. 8, 24.

⁷ *Ibid.*, p. 16.

⁸ *Ibid.*, p. 6.

⁹ *Ibid.*, p. 8.

¹⁰ Precinct Renewal Master Plan (approved MCC 28 July 2015), p. 16.

intangible cultural heritage significance of the market. It should retain and display all the vibrancy and theatre of a traditional market, including delivery and unloading, setting up and taking down'.¹¹ We point out that the Heritage Impact Statement (hereinafter cited as HIS) refers frequently to the People's Panel, attempting to present Option A as a response to the Panel's recommendations, but the references are in fact either to the Council's stated aims for the Panel or to the views expressed in the minority report. The HIS only refers to two quotes from the Panel (HIS p. 3, Section 2.2). The first reference is to the Council's statement to the People's Panel (p. 4 PP report), the second to the Council's 'draft principles prepared for the panel's consideration' (p. 9 PP report). There is no acknowledgement in the HIS that these quotes come not from the actual report drawn up by the People's Panel members but, rather, from CoM itself. In fact the People's Panel's recommendations strenuously opposed much of Council's aims. But the HIS, on this clearly dishonest basis, claims that 'recommendations of the People's Panel informed the development of the Market Infrastructure' (HIS p. 3, Section 2.2) and subsequently repeats this claim. Only a person who went to the official report itself¹² and looked up the two sole references provided would see that both are from CoM, not from the Panel. As we will see below, virtually all of Option A runs counter to the People's Panel's final recommendations as carried by a 'super-majority'. In the face of this resistance to its proposals, the CoM gave resources and preference to a small group from the Panel who then cobbled together a minority report after the vast majority of the Panel voted for recommendations contrary to CoM's preferred options. It was this Minority Report that came up with the proposal for excavating and building facilities on Queen Street manifest in the Northern Shed proposal. It was an idea that the full People's Panel rejected in favour of recreational and green spaces in this part of Queen Street (Recommendation 8); thus the prominence given to the Northern Shed proposal here, together with the claim that it was supported by the panel, is deceitful at best and fraudulent at worst.

We urge Heritage Victoria to note carefully the official CoM report on the panel (which we will include as a separate document alongside this submission). The first 14 pages are an elaborate, carefully produced, paginated document that CoM prepared in advance of the People's Panel meeting, and it is from this document that the HIS quotes in its two references to the Panel. The 'participant report', that is the report of the Panel based upon its own deliberations, starts on page 15 and continues unpaginated. It is a simple, hastily produced Word document, containing the 15 recommendations agreed by the overwhelming majority of the Panel. Only this portion of the document constitutes the actual recommendations of the Panel and to pretend otherwise, as does the HIS, is deceptive and misleading.

1.2 Option A: Loading, Safety and Waste Management

Traders operating in the mode characteristic of traditional markets do not require or wish for the proposed amount of additional storage, as we have argued in relation to the Trader Shed. Further storage capacity is one of the arguments for the Northern Shed and we hold that it too is not only unnecessary for the operation of a traditional market but manifestly excessive. One major aspect of Option A actually creates a requirement for more storage; under Option A, traders would no longer bring their goods to the market in their vans, drive them to their stalls and trade from them during the day. While Option A is carefully discreet, it is clear that the intent is a radical transformation of this mode of operation. Loading docks are a major feature of all three proposed new structures. They would not be required if it were envisaged that the traditional mode of operation would continue. With quasi-fixed stalls (POS storage) in place, there would not be room for the vans on site at stalls.

¹¹ 'Queen Victoria Market People's Panel: Participant Report' (Melbourne City Council, 22nd November 2018), Recommendation 2.

¹² 'Queen Victoria Market People's Panel: Participant Report' (Melbourne City Council, 22nd November 2018).

The HIS does admit that ‘the strategy for storage is to create a new, centrally located facility under the proposed Trader Shed’ (HIS, 5.3, p. 17). Thus it is clear that the required procedure will be for traders to deliver their goods to the new loading docks, to store them there and then take them to their stalls.

To the extent that the HIS provides a rationale for this drastic change, it is safety or ‘risk’: the word is used six times in the short section 2.4.1. The HIS asserts that ‘safety is currently an issue’ and that ‘there have been a number of incidents’, without citing a single ‘incident’. Indeed, the only basis for the assertion is Cardno, Safety and Logistics Management Report, Queen Victoria Market Precinct Renewal, and Economic Justification Report, SGS, which is entirely dependent on Cardno. The nine bullet points in 2.4.1 are all variations on the theme that having trucks and forklifts operating during market hours carries risk.

All such operations carry risk, and, without some substantive evidence and in the absence of any recorded injury between customers and trader movements, we have to ask whether ‘safety’ is a smokescreen to cover the proposed radical revision of the market’s mode of operation.

Perhaps more to the point, we have to ask whether anything proposed will reduce this risk. It is true that forklifts do occasionally travel from the Franklin Street Stores along Queen Street. But Queen Street is widely understood as a mixed-use zone. Under the sheds, there is little mixing. The historic structure of the market accommodates loading by virtue of its alternating service lanes (behind the stalls) and pedestrian alleys (in front of the stalls). And of course with the current, traditional mode of operation, the vast majority of goods are brought to the stalls in traders’ vans, obviating the necessity for transport within the market precinct during opening hours.

The Cardno ‘Safety and Logistics Management’ report recommends that forklifts be banned and replaced by Electric Pallet Jacks and/or Electric Reach Stackers. The main safety advantage of these seems to be that they are controlled by a walking operator and therefor confined to walking speed. These devices, which run on casters, are normally restricted to use in warehouses or yards with smooth hard surfaces and the report admits to concerns about difficulties of use on uneven surfaces and in inclement conditions:

- ‘forklifts operate better in adverse weather conditions
- surfaces, it is unsure if some (rough, uneven) surfaces can be upgraded (p.28)

The doubt seems to be whether it will be possible to create warehouse conditions in Queen Street and the market sheds, another step towards ‘sanitisation’ and the likely loss of further significant fabric.

The report concludes that ‘longevity of equipment can be affected due to abovementioned environmental factors’ (wheels) and that ‘It is difficult to know what future equipment improvements will be on the market post-development Therefore, it is recommended that proposed equipment be revisited closer to implementation, this will ensure that the best products are implemented for key logistical site movements’.

So although the designers of this proposal have observed a demonstration of the suggested equipment on site there is still uncertainty as to whether it will provide a viable and practical alternative to the forklift. This leaves the risk that if forklifts are to be retained the proposed unloading and storage buildings would result in an increase of forklift movement as traders are no longer taking their own vans into the market.

The issue of mode of operation also impacts upon that of parking. While the specifics of parking are not discussed in the HIS, Option A certainly includes the transformation of the current carpark into an ‘events space’ to be known as ‘Market Square’. The closing of the carpark and removal of vehicles from the sheds means that all loading and unloading will be moved to this small area in Queen Street between the upper and lower markets, entering from Victoria Street, and will lead to traffic chaos (see details of loading and unloading in Market Infrastructure Design Context Report, p. 40).

The principal function of the mooted Northern Shed, however, would seem to be to house a proposed underground waste processing space for decomposing organic waste pumped down from macerators at the rear of the A and B sheds and across from the rear of H and I sheds, to be held in sludge tanks in the basement (Design Context Report Part 1, Northern Shed, p. 38). If, in line with traditional forms of market operation, the unnecessary and excess storage capacity and amenities proposed for the Trader Shed were reduced, much of the recycling and processing of waste could take place there, as recommended by the People’s Panel (Recommendation 5), while decentralised bays in the rear of the sheds would serve to house cardboard compactors and other bins from where they could be unloaded at the end of trading days. People’s Panel Recommendation 7 (Dedicated Recycling Stations ground level and or below G Shed) elaborated further on an alternative model that would be cost effective and in line with world’s best practice, while allowing ‘back of house’ market activities to remain visible to visitors and customers. In recommending this use of the Trader Shed, the People’s Panel noted that ‘A previous development application pertaining to shed G (for waste mgmt) ... was approved by Heritage Victoria’.

The proposed major restructure of one of Victoria’s most prized historic places should not proceed without clarity as to what is planned, how it will work, and what the consequences will be. Given what we do know, the transformation now proposed—that is Option A—will lead to a ‘cleaned up’, ‘sanitised’ market. The attempt to hide all ‘back of house’ operations by central unloading, underground and discreet movement of goods, and total concealment of waste management threatens the market as a living tradition.

2) Economic Justification is misleading and hides an agenda of radical change

Both because the Executive Director is required to take into account the ‘reasonable and economic use of the place’ and because, despite a great deal of fudging, the Economic Justification report reveals the fundamental aim of Option A to radically transform the market, we now turn to an analysis of the economic case presented by the CoM’s consultants.

The Economic Justification (hereinafter cited as EJ) report argues that: ‘the QVMPL’s overall profitability has declined significantly. Since 2017, QVMPL has barely covered its cost of operations, let alone delivered a surplus for Council’ (EJ 3.1, p. 10). This argument is confused, contradictory, and based on unsubstantiated assumptions.

Far from showing the market to be unsustainable, the report shows that it has returned and will continue to return a reasonable profit. Figure 4 (EJ) projects profits rising from just under \$25 million in 2020 to over \$35 million in 2028. The section on the market’s ‘deteriorating financial performance’ undermines its claim from the start, admitting that ‘revenues have increased at a relatively steady rate since 1998’ (EJ 3.1, p. 10). It then shifts the ground, arguing that the problem is not declining revenue, but rather that ‘costs have grown at a faster rate particularly since 2010’ (EJ 3.1, p. 10). What are those growing costs? They are certainly not costs associated with ‘Facilities Repair and Maintenance’, because Figure 3 (EJ p. 13) shows a sharp decline in this expenditure since 2017. No, the growing costs result, apparently, from ‘the need to expand into

“non-traditional” activities such as night markets and other events’ (EJ 3.1, p. 10). Costs, the report reaffirms later, ‘largely relating to the expansion of the night market and an expanded events program designed to increase market visitation’ (EJ 3.2, p. 11). So, while QVMPL constantly put forward the night market and events as the way to make the market more profitable, it turns out they are costs that have reduced its profitability in recent years. So, in order to make the market more profitable, QVMPL proposes to pursue the strategies that are reducing its profit.

This contradiction results from the fact that the intent of Option A and of these supporting documents is to implement a radical transformation of the market by

- ‘increasing “non-traditional” activities’ (EJ 3.1, p. 10);
- ‘widen[ing] and diversify[ing] its offer to increase its attractiveness [against supermarkets]’ (EJ p. 6);
- developing its ‘leisure retail’ offer, that is shopping ‘catering to higher order retail’, undertaken by recreational shoppers likely to browse for discretionary items (EJ pp. 6, 7).¹³

These vague terms hide the underlying aim, which is to shift to higher value transactions enabling a much higher rent. The proof of this is the massive increase in profit projected under Option A, an increase only possible if rents rise sharply. The report projects a stunning increase in QVMPL’s revenue under Option A, from just under \$25 million in 2020 to \$45 million in 2028 (EJ Figure 6, p. 19), an increase of 180 per cent in eight years, or 22 per cent p.a. The report projects a positively amazing increase in QVMPL’s profit from \$500,000 per annum to approximately \$10 million per year (EJ Figure 6, p. 19).

Such a substantial increase in both revenue and profit can only occur if rents rise accordingly. The report projects revenue from open stands to nearly double in ten years, from \$7.996 million in 2019 to \$15.469 million in 2029 (EJ, Table 5, p. 19), a rise of 193 per cent or 19.3 per cent per annum. Traders in fresh produce cannot sustain annual increases of 19–22 per cent.

The report, to be sure, suggests that ‘bar operations, night markets and other events will make up an increasingly significant proportion of total revenues’ (EJ, p. 20). But, as detailed in Table 5 (EJ, p. 20), in 2029 open stands will still make the largest contribution to total revenue and indeed their contribution will increase as a proportion of total revenue (35.4 per cent up from 33.2 per cent in 2019). So, we repeat, the projected increase in revenue under Option A is only possible if rents in the open sheds increase massively.

Such rent increases would only be possible if many traditional fruit and veg stalls as well as general merchandise stalls (all these are open stands) were replaced with ‘non-traditional,’ ‘higher order retail’, and hospitality. That would mean the end of the market’s traditional mode of operation and ‘ongoing role ... as a fresh meat and vegetable market’ (VHR Statement of Significance).

The report claims that the market has been in decline, but it makes no attempt to analyse the causes of the purported decline. The RHSV, along with other organisations, has been concerned about the market’s state in recent years. There is strong anecdotal evidence for a decline in trade, but we suggest that an honest analysis would include consideration of the effect of Council and QVMPL decisions upon the market:

- CoM embarked on a controversial strategy, the Doyle Plan, which led to public anxiety about the future of the market.

¹³ SGS Economics and Planning, Queen Victoria Market Renewal: Economic Justification, p. 6.

- That was compounded by the wanton destruction of the Heritage Precinct and replacement of all but a small facade on Queen Street with an out-of-character apartment development with two 38-storey towers. This has led to deterioration of the market ambiance.
- QVMPL has failed to undertake publicity campaigns to counter the negative publicity generated by the Doyle Plan.
- QVMPL has carried out heavy-handed alterations. Alley A was cleared of shops ostensibly to open up the Victoria Street shops, but this has disrupted a previously vibrant area of the market. The treatment of Stringbean Alley, especially the use of shipping containers inserted in the open sheds, has further disrupted the market.
- CoM has failed to make a start on the conservation works that would make it possible to ‘spruce up’ the market while preserving its heritage value.

We do not argue that the market’s operations are achieving the best possible results, but simply the evidence supplied is contradictory and, importantly, that nothing in the report explains how Option A would increase revenue or profit, assuming that is desirable. As with the preceding elements, we submit that such a major restructure of one of Victoria’s most prized historic places should not proceed without a transparent plan for the market’s future, including projections of rent and the kind of trade envisaged together with guaranteed preservation of the heritage values specified in the VHR Statement of Significance.

3) Proposed ‘Northern Shed’: architectural/aesthetic issues relating to heritage



Figure 1: Proposed ‘Northern Shed’: From Design Context Report p.78

The northern section of Queen Street where it is proposed to locate the ‘Northern Shed ‘ structure is visually contained to the east and west by an almost continuous wall formed by the historic components of the market: the gable ends and verandahs of the open shed roofs to the west, and a combination of the solid wall of the meat market and the gable ends and verandahs of the two eastern sheds to the east.

These buildings are all single storey and of relatively low height so it would be hard to design even a modest structure in the middle of this part of Queen Street that would not seriously impact on the historic context.

But there is no attempt at modesty in this proposal. The building is extensive and needs to be of a height that will comfortably accommodate large trucks. Inevitably it commands attention and just by doing so will seriously compromise the historic streetscape by becoming the centrepiece of the space. It will also serve to divide the upper and lower market.

The impact of this building will be exacerbated by the nearby presence of the Traders Shed. Figure 2 from page 59 of Part 2 of the Design Context Report shows how the two new buildings will transform this part of Queen Street. Today the market sheds are the key elements of this streetscape but, if these proposals proceed, the new buildings will be the dominant elements intruding into this important space that is currently defined solely by historic fabric.

The RSHV thus strenuously opposes the proposed 'Northern Shed' and calls for an entirely different approach to dealing with this issue. An approach that started by recognising and respecting the significant social value in the way in which the market currently operates would obviate the need for the proposed structure and thus avoid such a serious impact on the historic setting. We therefore respectfully but urgently call on Heritage Victoria to refuse this permit.



Figure 2. Design Context Report Part 2 Section 4.6 Design Process and Response p.59