



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

Submission to Heritage Victoria P35216 Queen Victoria Market (VHRHO734)

12 September 2022

In Regard to permit application P34494 to install freestanding, lockable retail and hospitality pods within Sheds A and E in the Upper Market, and formalise a storage and business-to-business environment between Sheds A and E

I write on behalf of the Royal Historical Society of Victoria to object to this application for a permit. 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 heritage of the city and its inner area. The RHSV has a long involvement with the City of Melbourne and has long been recognised as a stakeholder in the City's development. Our location since 1999 at the corner of A'Beckett and William Streets (a block from the QVM) has cemented our position as a stakeholder in discussions of the QVM.

The RHSV submits that permit application P34494 poses a grave danger to the market's heritage values. It proposes to effectively close off one-half of the most historic part of the market (the 1878 sheds) through a variety of new semi-permanent structures, most 2.6m high, thus posing a significant visual threat and undermining the market's social significance as a traditional market as per its VHR citation. Despite requests from Heritage Victoria, no real economic justification has been submitted; what has been submitted suggests that the current strategy is more likely to kill the goose that lays the golden eggs. We address these issues in detail below.

The Proposal

The proposal involves three aspects, all of which would clearly be detrimental to the perceived appearance of the market and to its social significance as a traditional market. All told, the area affected comprises half of the 1878 sheds (Sheds A to E), which are the most historic part of the market (see HIS p. 13, Figure 12 Future/proposed use plan). Our concerns are summarised in the Letter from Michelle Knehans for Lovell Chen to the Executive Director (3 August 2022): 'the main concern is that the proposal will prevent public access, physically and visually, to a significant proportion of the sheds, including a portion of the sheds currently in use by fresh produce traders

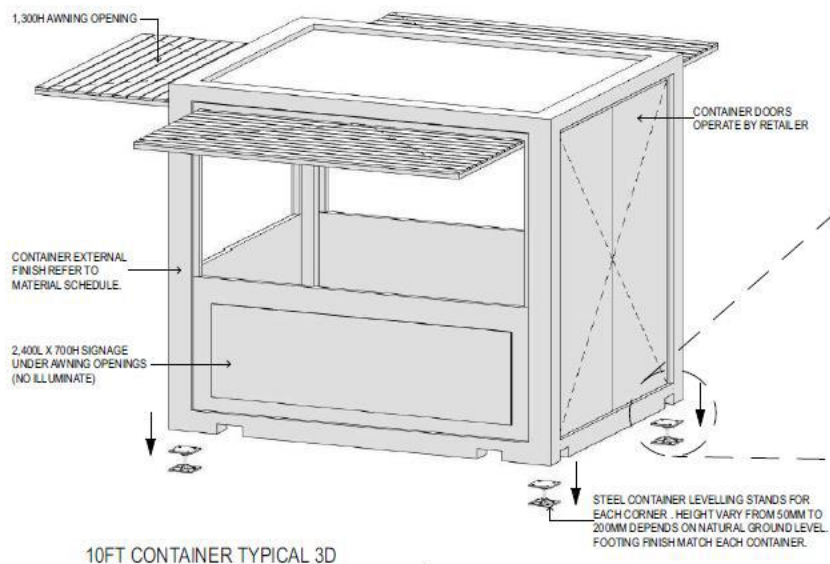
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The three aspects of the proposal are:

- Provision of a secured business to business (B2B) trader area under B Shed. This area will be a shed devoted entirely to loading docks. It will be closed to the public. While it may be partially transparent, it will represent an alien visual intrusion. The HIS admits ‘minimal [visual] impact’: ‘the proposed change of use will impact on the access and appearance of this area of the market.
- Provision of a back of house area for traders and market storage under C and D Sheds. This area will be fenced off to a height of 1.8m, thus providing a physical as well as a visual blockage.
- Installation of 2.6m high containers (‘freestanding lockable trading format pods’ beneath A Shed and along Peel Street and the centre walkway.



HIS, p. 17, Figure 19 Proposed 10-foot CT1 container.

Effects of the Proposal on the Visual Aspects of Heritage Values

The HIS admits that ‘the containers will present as new insertions within the sheds’, but argues that ‘the muted tones ... will prevent the containers from presenting as overly stark or as uncharacteristic within the context of the sheds’. Tones, muted or otherwise, are not the issue. What is at issue, as the HIS admits, is ‘the potential for the bulk and form of the containers to block views through the shed and disrupt the sense of openness’. Views looking up to the shed trusses are irrelevant to the visual blockages at eye level which the proposal will bring.

The visual characteristics of a traditional market were that the sheds provided cover for a daily assemblage of sellers, each setting up their stall independently. In the case of the QVM, the dominant set-up in the historic sheds has been trestle tables with occasional free-standing units for storage or (until recent changes forced by QVM management) traders’ vehicles. The heterogeneity the resulting spaces has ensured an open visual effect.

The essence of the current proposal is to replace the spontaneous, heterogenous arrangements of individual sellers with what are essentially fixed, permanent stalls made of containers 2.6m high.

This height and uniformity will block the open visual appearance which enabled the market visitor to read the market as a whole in terms of a traditional, open market set up by its sellers under the shed canopies.

Figures 26-28 of the HIS show views of sections under the sheds as currently functioning with some storage cases or silver boxes to heights of 2 m. This is intended to suggest that the current proposal involves nothing new. But the proposal is to systematise containers of 2.6 m or to block off a section completely.

Figure 7 of the HIS (below) shows the present state of Shed A, which is proposed for the new pods. It is a very open vista.



HIS, p. 9, Figure 7 View under A Shed looking south along the central walkway.

Figure 30 of the HIS (below) shows the result of previous applications for the installation of such containers. The total visual blockage is undeniable. The current application, if granted, would result in a similar blockage, but this time under the whole of the most historic sheds.



HIS p. 41, Figure 30 Current view along String Bean Alley following the installation of retail containers

Figure 5 of the HIS (below) is the iconic view of the sheds from Peel. The proposed changes would completely block the current open vision from this side.



HIS p. 8, Figure 5 QVM Upper Market sheds, view from Peel Street (west elevation)

We believe it is clear from the foregoing that the market would suffer a significant loss in its heritage values as its characteristic visual openness is lost. We therefore submit that the proposal should be rejected on grounds of the market's heritage value.

Effects of the Proposal on the Social Significance Heritage Values

The Market's Heritage Social Value is included in the Statement of Significance, Criterion G: '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.'

As the CMP notes (HIS p. 28), A, B, C, D & E sheds remain 'reasonably intact' in 'original form and fabric'. It adds, importantly, 'the sheds are emblematic of the historical and ongoing market use of the site and are central to its significance of the market'.

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'.¹

Based on the pioneering work of Chris Johnston,² 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'.³ 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'.

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 the 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'.⁴ 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'.⁵ The report explained:

¹ Québec Declaration on the Preservation of the Spirit of Place, Adopted at Québec, Canada, October 4th 2008, p. 2.

² Chris Johnston, 'What is Social Value? A Discussion Paper' (Canberra: Australian Government Publishing Service, 1992).

³ Heritage Council Victoria, 'Guidance on identifying places and objects of state-level social value in Victoria', 4 April 2019.

⁴ 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.

⁵ Ibid., p. 16.

*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.*⁶

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).*⁷

People come to the QVM 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 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'.⁸

The HIS admits (p. 32) that 'the way in which part of the market functions will alter as a result of the proposed works'. The part of the market whose function it is proposed to alter substantially is half of its most historic portion. Furthermore, this alteration is likely to be irrevocable in that trading patterns on the part of both traders and customers will be altered making it impossible to restore the traditional functions of the market.

We therefore submit that the proposal should be rejected on grounds of the market's social value.

Considerations of Economic Issues and Reasonable Use

We note that the HIS (p. 45) argues that

Given that the Market's origins as a fruit and vegetable wholesale market and that fresh produce remains the core attraction for an estimated 73-92% of Melburnians, supporting the viability of fruit, vegetable and other fresh produce traders is essential to preserving the Market's cultural heritage and the viability of the Market as a whole.

⁶ Ibid., p. 6.

⁷ Ibid., p. 8.

⁸ 'Queen Victoria Market People's Panel: Participant Report' (Melbourne City Council, 22nd November 2018), Recommendation 2.

We are therefore surprised that these proposals reduce significantly the place of fresh fruit and vegetables in their traditional format. Moreover, there is no economic case provided. The HIS is limited to arguing that ‘the Market has experienced a significant decline in occupancy of traditional stall-based merchandise trading in the Upper Market Open Sheds. In contrast there has been increasing demand for shops and other lockable/fixed trading formats.

The decline is presented in graph form for the past five years as follows: ‘General merchandise stalls currently average approximately 60% occupancy in contrast to average 80% occupancy in fruit and vegetable stalls ... and average 100% occupancy in the Market’s fixed, locable trading formats’. We note that Figure 30 above shows String Bean Alley, which may have 100% occupancy but is not an exciting trading space.

More fundamentally, we suggest that a proper economic analysis would proceed from the centrality of fruit and vegetable stalls to include as well the importance of general merchandise, especially for visitors to Melbourne, and examine how to reinforce these areas. What is needed is an analysis of why people are not attracted to the stalls.

The period under consideration coincides with the announcement of the Doyle Plan and then (after its rejection) of the Renewal, decisions which clearly had a discouraging effect on traders and customers, an effect exacerbated by the two years of Covid. Has that been taken into account?

The occupancy rate is not the same thing as consumer demand, which the proponent accepts is high (73-92% of Melburnians). Traditionally, the Market offered low-rent stalls requiring almost no capital input and the stalls were eagerly sought-after, especially by new migrant groups. Indeed, the Market played a significant role in the social integration of these groups. Are current policies appropriate to attracting new migrant groups? Has an effort been made to reach out to them? Or has QVM Pty Ltd’s push for ‘value-add’ and ‘hospitality’ led to the perception that the traditional market has been downgraded?

The HIS admits that refusal would not mean ‘that the Market would no longer be able to operate as such or that the economic benefit foregone would be unsustainable’. It argues, however, that it ‘would contribute significantly to a progressive decline’. But in a characteristically circular argument, the HIS cites four factors:

- Declining trader occupancy in traditional general merchandise stalls
- Unmet demand for fixed/lockable trading formats
- Under-utilisation of the precinct
- Outdated, inefficient and unsafe operations

Now the first two of these factors are simply a reformulation of the sole fact adduced, concerning occupancy rates (though interestingly fruit and vegetable stalls have disappeared). And the third and fourth factors are vague assertions without any empirical backing.

These are circular arguments and this is typical of the economic case presented. Many of the changes, it is argued, are required because other aspects of the Renewal programme are wrecking existing modes of operation. Thus, the HIS argues, ‘the formalised back of house area will also provide essential retail storage space that cannot be accommodated elsewhere within the Market once the Franklin Street Stores are refurbished for active re-use as part of Renewal’. In other words, the heritage values of one part of the Market must be sacrificed because another part is being sacrificed.

The same circularity obtains in the arguments for the B2B area, which is required because of 'limited vehicle access to Queen Street following Market Renewal'. Again, it is QVM Pty Ltd which has decided to limit (virtually to remove) Queen Street vehicle access, against the express advice of traders, especially from the Meat Pavillion, who depend on this access for their sales to businesses.

Both these circular arguments are repeated several times. We urge the Executive Director to discount these arguments based on the consequences of decisions which the proponents undertook on their own initiative.

The foregoing is the sum total of the economic case. On this slender and imprecise basis, the proponents give remarkably fat and precise figures for the costs of refusal: \$11,156,000 over ten years! Astonishingly, they attribute this loss of revenue to a decline in revenue 'from general merchandise and fruit and vegetable stallholders, and retail storage'. The HIS clearly shows that the area devoted to general merchandise would be significantly curtailed under the proposal and it is clear that, rather than seeking ways to expand fruit and vegetable on the west side of A-E, QVM is seeking to devote this space to other uses or formats that have not been successful with the public, whatever their occupancy rate.

We note that the HIS claims that 'the proposed works are in line with the QVM Future Market Strategy' and that this followed 'an extensive feedback process'. We query this. We do not believe that traders or the public were given any significant opportunity to provide feedback. The RHSV, whose feedback was sought for the People's Panel, was not consulted. Moreover, the strategy is completely counter to the thrust of the majority findings of the People's Panel.

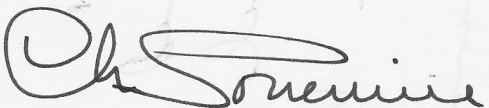
The applicant has not provided a serious economic case for hardship in the event of refusal and we therefore urge the Executive Director to discount the claims for economic hardship.

Conclusion

The proposals represent a massive loss in the visual heritage values of the most historic part of the QVM. They represent a most serious threat to the social and cultural significance of the QVM. And the applicant has not presented a case that the proposed measures would improve the Market's economic functioning.

The proposals clearly represent a threat to the core business of the market, its fruit and vegetable trade in traditional format, cherished by 73-92% of Melburnians, and to general merchandise, so important to tourism. Where serious work has been done to elucidate what is needed to improve visitor numbers and turnover, as in the case of the CoM 'Intangible Values' study, it has shown that what is needed is to reinforce the areas that make the QVM popular. The application under consideration would represent a significant step backward in every respect as well as a threat to the visual integrity and cultural and social heritage values of the QVM.

We therefore call on Heritage Victoria to refuse the current permit application.



(Professor) Charles Sowerwine,

Chair, Heritage Committee.