



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

Submission to Heritage Victoria P35216 Queen Victoria Market (VHRHO734)

Refrigerated Display Unit, I Shed (Stalls 66–70)

26 July 2021

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.

We submit that the installation of a refrigerated display unit, as sought in I Shed or elsewhere, would adversely impact the market's cultural heritage, both in terms of built fabric and of social value inherent in the market's traditional mode of operation.

Before proceeding to the substance of the threat this application poses to the market's heritage value, let me object to the manner in which the applicant is proceeding. The proposed unit does not fit the criteria for a permit exemption. The application is in fact an attempt to have an illegal action approved retrospectively as the unit has already been installed.

If the application is nevertheless considered, it should be noted from the outset that the application takes the form of a permit application rather than an exemption only after reluctantly conceding that the dimensions of the refrigerated display fall outside the Queen Victoria Market Guidelines for Food Stalls in Sheds A, B, H and I (QVM October 2011). These guidelines constitute automatic permit exemptions if complied with. The spirit of the exemptions is that they will cover occasional and unusual examples that will not obstruct views. Section A also provides: 'Generally, no part of any stall should be attached to any part of the open shed building or prevent access to any part of the timber posts'. The repetition of the word 'open' offers proof that the main consideration is to preserve the traditional aesthetic and function of the market sheds, which were intended as open canopies to allow freestanding temporary stalls to be installed each day as required.

The applicant argues that these guidelines are out of date because 'of the changed context of the market and its traders' and that the 'introduction of refrigerated units forms part of the evolving nature of the market to meet trader requirements and customer expectations'. We submit that the guidelines already make more than sufficient concessions to trader requirements within the framework of the market's current mode of operation. The proposal is for something that is entirely different, a large refrigerated 'display case' such as those commonly installed in commercial supermarket chains. It is not a 'cool room' nor a 'bulk storage unit' common at QVM. The

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presumption of such a display case is for an entirely different mode of operation and an entirely different aesthetic and architectural context from the market, and one utterly inconsistent to its heritage values.

The VHR notes the market's '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 National Heritage Listing: (http://www.environment.gov.au/cgi-bin/ahdb/search.pl?mode=place_detail;place_id=106277) states precisely (Official Values, Criterion D) that 'Significant features of the market sheds include their open design to allow accessibility and circulation, absence of permanent stall structures'. The application runs entirely counter to these values.

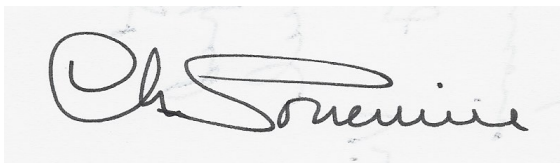
This non-compliant display unit, if approved, would set a precedent for future threats to the QVM's heritage values, such as 'Point of Sale Storage', currently mooted by QVM Pty Ltd, which, like the current application, although described as 'semi-permanent', would in reality become quasi-permanent fixtures. These would change the nature of market trading to favour large enterprises and chains at the expense of the small traders who currently predominate. To agree to a permit for this unit would set a precedent and could lead to a significant change to the operations and appearance of the fruit and vegetable sheds.

The application sees this unit as consistent with the historical significance of the QVM as a retail market. But the application obscures the fact that the QVM is not undifferentiated space. It is listed, as the VHR Statement of Significance puts it, because it is 'a notable example of the class of produce market. It is a remarkably intact collection of purpose built nineteenth and early twentieth century market buildings'. That it is 'purpose built' suggests that the purpose is crucial to the built form which is protected, that of open canopies to allow freestanding temporary stalls to be installed each day as required.

Thus the QVM's historical significance does not derive from its being any site where food is sold, but from its mode of operation as a traditional open market in an architectural context created for that mode of operation. The market operates today as 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 appearance of the market changes each market day as each independent operator sets up according to the demands and expectations of produce available and custom expected.

The application, if granted, would open the way to fixed displays operated by larger-scale retailers, with the QVM becoming like any other modernised market, with fixed stalls serving boutique items or fast food, with a focus on events, instead of the mix of individual stalls making their own displays. That would run counter to the whole purpose of the QVM's heritage listings, both Victorian and National.

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



(Professor) Charles Sowerwine,
Chair, Heritage Committee.