



## ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

### Submission in regard to P36779

**Queen Victoria Market, 65-159 Victoria Street, Melbourne (VHR H0734)**

**29 August 2023**

Mr Steven Avery,  
Executive Director,  
Heritage Victoria.

[heritage.permits@delwp.vic.gov.au](mailto:heritage.permits@delwp.vic.gov.au)

Dear Steven,

The RHSV objects strongly to the proposal. Here follows our submission, a copy of which I have also entered through the internet portal.

The RHSV is the peak body for 340 local history societies and as the historical society for central Melbourne. Since its founding in 1909, the RHSV has supported history, commemoration and preservation of heritage across Victoria.

#### **Bulk of Proposed Towers**

The bulk, height and uniformity of the proposed towers and their imposition virtually above the Franklin Street stores will have a grave negative impact on the heritage value of the Queen Victoria Market. We disagree strongly with the developers' assertion that "the architectural significance of the Queen Victoria Market is independent of its surrounds." We submit that it is of the greatest importance that Franklin Street and the Franklin Street stores can continue to be read as the southern extent of the market, rather than allowing the public open space to visually excise the Franklin Street stores from the rest of the market site. The stores are the visual markers of the market's southern boundary. The demolition of some sheds to create a parking area for the market did not change the aesthetic that the market was legible as a whole extending from the Victoria Street shops to the Franklin Street stores.

The scale and character of development proposed behind and indeed above the Franklin Street Stores runs completely counter to this legibility. The towers, at 124 and 154 metres, far exceed even the minimal planning controls, which provide a discretionary maximum height limit of 100m or floor area ratio of 12:1. The market will be completely dwarfed by the bulk of these structures.

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More importantly, the flat, rectangular façades presented to the market are almost completely devoid of articulation. In the words of John McNabb (“Victoria Market ‘mega-wall’ will literally divide Melbourne in pursuit of profit,” *The Age*, 24 July 2023), “the gap between the individual towers is so uncomfortably small it reads as a continuous wall, a barrier or shield, not offering visual relief, vistas through or connections beyond. It blocks visual penetration from most orientations and separates the remaining city to the south from the pulsing low-profile oasis of the Queen Victoria Market.”

In order to preserve the reading of the market as a whole, its immediate surrounds should conform to its low-rise profile. The developers claim that “the impact of the proposal is to bring this backdrop of tall buildings closer to the market, but without intruding upon its significant character.” This is wrong, appallingly wrong, on two counts. First, it misreads the urban context. Currently, the view from the market to the east and south is of an urban forest, a variety of sizes and shapes, with some taller buildings here and there. In its current form, the proposal presents as a wall, not the varied backdrop that exists now. Second, as the HIS (§ 10) admits, the two multistorey towers, far from being a backdrop, would be cantilevered part way into the VHR extent of registration. This is an extraordinary landgrab. And it gets worse. The HIS does not make it clear, but the cantilever of one tower steps out “to a maximum extent in line with the south elevation of the Stores” and that of the other tower steps out a mere “475 mm short of south elevation of the Franklin Street Stores.” This is not backdrop, it is crushing foreground. Significantly, the artists Render of the proposed Market Square (Figure 46) omits the upper levels of the two towers, but even so it makes clear how heavily the towers would weigh on the stores and a fortiori on the market as a whole.

Given the enormous deleterious effect on the QVM site, the development should not be permitted. At the very least, some buffering is absolutely required if the market’s heritage values are to be preserved. First, the façade should offer much more distinct vertical separations and articulations if it is to imitate the existing urban backdrop. And, second, the development should be set back from the Franklin Street stores and then stepped so that it offers some articulation and does not crush the stores. Interestingly, there is some stepping conceded toward the Flagstaff Gardens. Why not toward one of Victoria’s most significant heritage sites?

### **Franklin Street stores**

The Franklin Street stores were the product of a half-century of development of the market and were intended to be read as its completion and culmination. The HIS cites the CMP (Fig. 39 and p. 26) to argue that the stores are of contributory significance. This is true in the sense that each of the sheds and buildings of the QVM contributes to the whole; no one shed or building is on its own of individual significance. But it is not true in the sense that the HIS implies, i.e. that it is not important. Indeed, it would be an irony to say, as the CMP does, that the carpark is significant and the stores and sheds are “only” contributory.

It follows then, as we argue above, that the Franklin Street stores require some breathing space to be read as part of the market and not the underpinnings of a massive commission like building. It also follows that they deserve proper treatment in their own right. The HIS commendably provides a plate of the stores in 1973 (Fig. 16), which shows the detailing as per the contract drawings of the Franklin Street Stores (Fig. 26). If the detailed assessment of the schedule of conservation works bears out that the stores will be fully restored in line with the drawings, this work is acceptable.

We cannot, however, accept the proposal to demolish the south canopy to the stores (HIS, p. 37), “The central parts of the canopy (i.e. under the soffit of the T1 and T2 cantilever) will be permanently removed. ... The western and eastern ends of the canopy will be reinstated.” We submit in the strongest terms that this loss of original fabric to the listed site is completely unacceptable. And it shows how heavily the proposed towers would weigh on the stores and on the market.

### **Carpark/Market Square**

The proposed treatment of the carpark presents several problems.

First, we are uncertain whether the relevant stakeholders accept the proposal to plant significant trees, whose roots will have a profound effect on any human remains. In particular, we would support any objection from the Wurundjeri Corporation.

Second, we submit that the loss of the carpark, created sixty years ago to help the market adapt to the age of the motor car, will have a deleterious effect on the market’s heritage values, particularly in regard to 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.” To fulfil this criterion, the market must function as a retail market for fresh meat and vegetables. The carpark is essential to this function. Its transformation into what the Council have called an “event space” will obviously mean the end of convenient parking and accessibility to the market’s retail spaces. And the event space will be at best irrelevant to the market and at worse deleterious in offering competition to regular stall holders. In a decade of discussion of the market’s future, no case has been made that events support the market in bringing customers to the stalls.

Third, this transformation will significantly impair if not prevent altogether the market’s being read as a whole. It will isolate the Franklin Street stores and give the impression that the market ends at a leafy square, which we have already argued is wholly incompatible with the 19<sup>th</sup> Century urban aesthetic that underpins the market. In that aesthetic, the market was inserted into a busy, low-rise environment.

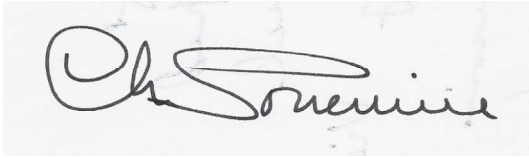
Fourth, in so far as one can discern it from the documentation, the square design is totally antipathetic to the market’s 19<sup>th</sup>-Century urban aesthetic, characterised by rational, legible, rectilinear design. The overall framework of the Hoddle Grid is the context to which the market responded. That would call for a design that responded with clear lines of sight. Instead we are offered “irregular/oblong shaped berms with areas of lawn and tree plantings.” This post-modern chaos would thumb its nose at the geometrically conceived sheds at the heart of the market.

### **Conclusion**

We submit, respectfully but urgently, that the application in its current state should be refused. The bulk of the proposed development would crush the market and destroy much of its heritage values. The towers and the market square would isolate the market and transform it from a grand ensemble stretching from the Victoria Street shops to the Franklin Street stores into a foreshortened set of sheds hemmed in by an inappropriate mini-wilderness.

For all these reasons, the Royal Historical Society of Victoria urges rejection of the application.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature is written in a cursive style and reads "Ch Sowerwine". The "Ch" is written as a large, stylized initial, and "Sowerwine" follows in a fluid, connected script.

(Professor) Charles Sowerwine, FAHA, FRHSV,  
Chair, Heritage Committee,  
Royal Historical Society of Victoria.