

## Re Queen Victoria Market

### I am a Vic Market customer and I object to the permit application cited below:

Permit application P32629 for a permit to construct a new 'Northern Shed' within Queen Street and installation of new service trenches and associated public realm upgrades.

#### *WHAT IS SIGNIFICANT?*

*Queen Victoria Market including the land, buildings and structures (including the exteriors and interiors), roads, trees and historical archaeology.*

#### *HOW IS IT SIGNIFICANT?*

*The Queen Victoria Market is of historical, archaeological, social, architectural and aesthetic significance to the State of Victoria.*

#### *Criterion A*

*Importance to the course, or pattern, of Victoria's cultural history.*

#### *Criterion C*

*Potential to yield information that will contribute to an understanding of Victoria's cultural history.*

#### *Criterion D*

*Importance in demonstrating the principal characteristics of a class of cultural places and objects.*

#### *Criterion G*

*Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons.*

#### *WHY IS IT SIGNIFICANT?*

*The Queen Victoria Market is of historical significance as one of the great nineteenth century markets of Victoria and the only one surviving from a group of important central markets built by the corporation of the City of Melbourne. It has been in continual operation as a retail market since the 1870s. The Queen Victoria Market is of historical significance as the site of Melbourne's first official cemetery, which was in use between 1837 and 1854, and intermittently from 1854 until its final closure in 1917. [Criterion A]*

*The former cemetery site is of archaeological significance because it contains an estimated 6,500 to 9,000 burials. The site has the potential to yield information about the early population of*

*Melbourne, including Aboriginal and European communities, and their burial practices and customs. [Criterion C]*

*The Queen Victoria Market is of architectural significance as 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, which demonstrate the largely utilitarian style adopted for historic market places combined with the later attempt to create a more appealing 'public' street frontage through the construction of rows of nineteenth century terrace shops along Elizabeth Street and Victoria Street. [Criterion D]*

*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. [Criterion G]*

Preface:

Queen Victoria Market is not just a place, it is also a way of trading. A 'market' is a specific form of business based on high volume sales, where traders cut overheads by setting up impermanent stalls rather than trading out of a lock up shop. In QVM context, this means traders who run small family owned businesses use their vehicles to store and transport goods within the market.

The 'operational' changes projected in these plans will destroy the integrity of the market as cultural heritage, because changing this way of trading and forcing traders into fixed premises means taking the 'market as a form of trading' out of the market, leaving just a collection of historic sheds.

The current plans for 2 new sheds have been developed specifically in order to allow fundamental changes to market operations which will mean the destruction of the market's cultural heritage.

The proposals to close off Queen St and destroy the historic use of the market space as shown in the old photo of Queen St on the front of the A3 Public Realm Document. Queen St has always been the arterial spine of the market, providing vehicle and pedestrian

access to stalls in each half of the market. Today cars have replaced the horse & cart as portrayed in the historical photo.

The proposed changes in the two pending applications will negatively affect the survival of the market by making it impossible for most current traders who all operate independent businesses to continue trading in the traditional way of the market – low rent/high volume low cost trading.

Being different to a shopping centre or supermarket delivers economic advantages to QVM. The planned 'modernisation' of market operations will remove that advantage .

The documentation provided for this application refers throughout to the proposed Queens Building, a massive new structure within the market space that will certainly compromise heritage values; and to 'point of sale' storage which implies fixed lock up stores, which will affect both built and cultural heritage values in the sheds. We believe that it is impossible to approve the current plans without considering the heritage implications of these other structures.

In effect, submitting the current intended plans separately, is an attempt to gain 'approval by stealth' for the next stage, in that once these current structures are approved, and granted that they will not work without the additional storage and facilities, it will be harder to argue against the Queens Building and point of sale storage.

### **People's Panel**

I was a participant in the People's Panel process and can assure Heritage Victoria that the People's Panel recommendations used to support the proposed plans have been distorted for the purpose of this application.

The recommendations of the People's Panel have been repeatedly referenced throughout the application document. The references have been disingenuous, manipulative and misinterpreted. They incorrectly imply findings that are not true while giving credence to all points on the Minority Report which mirror the CoM's Master Plan. It should be noted that Recommendation 3 re Parking at the

exiting car park, was immediately struck out by City of Melbourne (CoM) at the ensuing council Futures Melbourne Committee meeting. The new plans proposed in this application to Heritage Victoria reflect the Minority Report only which is in line with the council's Master Plan.

I object to this application for the Northern Shed for the following reasons:

1. The proposal is not appropriate as regards the intactness of the Market and its built heritage.

- The proposals to close off Queen St destroy the historic use of the market space – see the old photo of Queen St on the front of the Public Realm Document, showing that Queen St has always been the arterial spine of market providing vehicle and pedestrian access to stalls
- Architecturally, the market will be dominated by the new structures which are visually extremely intrusive
- The Northern Shed includes a large and permanent retail component which will block Queen St and divide the Upper and Lower Markets.
- The roof is 8.67 m high which exceeds the maximum permitted building height of 7 metres under DDO14
- The roof of the Northern Shed will be at odds with the current sightlines across the market
- Together with bollards, furniture & trees, the Northern Shed will separate the 2 halves of the market
- The new 'retail space' under Northern Shed in Queen St will be massive (43 metres long and 16 wide) and also obstruct sightlines across the market.
- How/ why does a coffee shop/ retail space have clear glazing to allow views to the garbage depot below? In the floor?
- Why is a garbage station being placed in the heart of the market?

According to the HIS, P24 *“Overall, it is recognised that the structure is a large insertion into the streetscape and as a result, there will be a moderate impact on the setting of the place.”* We would argue that it

needlessly creates a total intrusion into the unity and integrity of the market as a heritage place.

2. The proposal does not maintain the integrity of the market or its cultural heritage.

Further, the plans for 2 new sheds have been developed specifically in order to allow fundamental changes to market operations, which will mean the destruction of the market's cultural heritage

- The market is not just a place, it's also a way of trading. A 'market' is a specific form of business based on high volume sales, where traders cut overheads by setting up impermanent stalls rather than trading out of a lock up shop. In QVM context, this means traders use their vehicles to store and transport goods within the market.
- The seemingly 'operational' changes projected in these plans will destroy the integrity of the market as cultural heritage, because changing this way of trading and forcing traders into fixed premises means taking the 'market as a form of trading' out of the market, leaving a collection of heritage sheds that nostalgically reference our market history.
- The new logistics system signals a major change to a shopping centre/ mall environment as it means management actively 'managing' the space rather than letting the stall holders manage their businesses independently which is the hallmark of market trading. The proposed operational plans mean that 'deliveries will occur in a formalised location, and within a managed environment' (p34 Planning Report)
- The proposed changes will negatively affect the survival of the market by making it impossible for most current traders to continue in business, especially with the forecast rent increases. According to the Economic Justification, trader rents will double after the renewal in order to pay for the (unnecessary and inflated) storage and infrastructure. Inevitably higher overheads will change the

historical trader mix and traditional scope of the market as a community asset and value for money place to shop.

- Being different to a shopping centre or supermarket delivers economic advantages to QVM. The planned 'modernisation' of market operations will remove that advantage.

3. Maintaining the integrity of the market's cultural and social heritage. In regard to the claim of community benefit and an improved public realm, the proposed facilities cannot be considered an improvement for a number of reasons.

- The plans for 2 new sheds have been developed specifically to allow fundamental changes to market infrastructure, which will result in the destruction of its cultural heritage.
- The new infrastructure is intended to remove open storage and vehicles from the sheds to form a different form of trading operation. The Market's traditional form of trade is based on high volume sales and reduced overheads by the impermanence of the stalls. In this context, traders have always used their vehicles to store & transport goods within the market.
- The proposed 'operational' changes will destroy the integrity of the Market's cultural heritage by forcing traders into fixed premises and taking the market form of trading out of the market. The historic sheds will stand as a reminder of the noisy, vibrant market that it once was.
- The proposed logistics management system signals a significant change preventing each stall holder of the responsibility of managing their own businesses independently. It formalises unloading/loading operations, with QVM management actively in control of all aspects of the deliveries from timing to location to

storage to stall. In essence replacing QVM's tradition operation with a supermarket/shopping mall model.

- QVM's current traditional operating practices make a significant and ongoing contribution to our heritage, our history, and social integration in Melbourne as well as cultural tourism.
- The plans show the emphasis on event/recreational space over market operations: more than half the Upper market, that is the car park and Sheds K,L,M and N, along with Queen St under the proposed Northern Shed to be used for non-market purposes, mostly for 'events' on a commercial basis. It is also proposed that pedestrianized Therry St will convert to a recreational space to relieve visitors from the 'vibrant buzz ' of the market.
- To preserve QVM's historical significance it is essential that it continues to operate as a working market which means recognising, and then sustaining, the nexus between people, place and practices that continue to shape the market as a lived and living space.

## **Insert: Queen Victoria Market: Intangible Values RMIT**

### *Introduction:*

*In the first half of 2017, researchers from the Digital Ethnography Research Centre at RMIT investigated the 'atmosphere' of the Queen Victoria Market, and how it formed a part of the intangible value of the site. We immersed ourselves in the life of the Market and interviewed and observed vendors, workers, visitors and shoppers and participated in the life of the market ourselves by, shopping, photographing and filming.*

*We video- and audio-interviewed eighteen people in total: ten workers at the market, including sellers and business owners in the retail, general merchandise, produce and deli hall; seven regular shoppers; and one visiting tourist. These seven men and eleven women were aged from their 30s to their 70s, and although we did not ask people to identify their cultural background, participants were also diverse in this regard. We observed and spoke informally with many others, and also made a series of professional photographs that captured our own auto-ethnographic experience of the site, on various days from very early in the morning to late at night. We observed the rhythms of different areas of the market by entering into them and by making and watching video footage.*

*These methodologies enabled research participants to show us how they perceive, navigate, make sense of and value the site. By going along with research participants in the Market, as well as experiencing it ourselves, we were able to build up a rich perspective on what comprises and is valued about its unique atmosphere.*

*The full report which is a good read can be found by searching Google: Queen Victoria Market: Intangible Values*

Insert: QVM Intangible Values – RMIT next page:



Front cover of the report

## QUEEN VICTORIA MARKET: INTANGIBLE VALUES

### Final Report

Prepared for the City of Melbourne and  
the Queen Victoria Market Pty Ltd



Shanti Sumartojo, Joanne Mihelcic,  
Nicholas Walton-Healey, Bianca  
Vallentine, Sarah Pink

September 2017



#### 4. Adverse impacts from the operational changes

- Repeatedly the CoM claims that the infrastructure is necessary due to
  - OH&S reasons ie conflicts between service vehicles – forklifts - & the public;
  - Need to improve delivery access; to improve trader facilities – toilets, showers, lunch room; and improve waste management.
  - Current market operations are not compliant & afford high levels of OH&S risk.
  - Adverse economic impact
  -
- **4.1 OH&S Risk** – One can't argue the importance of public safety despite there being no objective documentation showing risk to public safety at QVM. However better management practices could alleviate potential issues.
- Much of the Heritage Impact Statements discuss the need to deal with occupational health and safety issues and food handling regulations and the consequent need to retain a viable trading operation. It isn't clear what alternative ways of dealing with these issues has been explored and what are the critical issues anyway. No evidence of alternative strategies have been noted or explored.
- Safety of both traders & customers is an obvious responsibility of both traders & management working in tandem.
- In addressing these issues surely it doesn't require these intrusive modern buildings. Plans cite lack of amenities & failure to comply with OHS. However there have been collaborative United Traders Union/trader/management talks around developing an alternative at-grade strategy eg safe access routes, spotters, boom gates, safety forklift features etc. These talks were postponed then stalled by QVM management. Evidence of these negotiations are available from the United Workers Union & QVM forklift drivers. Much is said about potential risk/ conflict but there is no historical

evidence of existing movement being unsafe. Ie no records of accidents at the market.

- Expert advice from OH& S expert Dr Gerry Ayers (**bio & contact details inserted**) claims there are many alternative ways to make the market safe for both traders & the public that are simple, realistic and cost effective. Dr Gerry Ayers refers to the Victorian OHS Act state legislation which declares that it is the **joint** responsibility of traders and management. He refers to relevant sections of the Victorian OHS Act to consider/highlighting Sects 2 (b); Section 4 (1 & 2); Section 20 (2) a,b,c,d,e, and even consider Section 21 (2) a.

**Insert –bio Gerry Ayers Email: [gerrya@cfmeu.org](mailto:gerrya@cfmeu.org)**

*Gerry has worked in the construction industry for over twenty-five years. He started work as a builder's labourer. He has a PhD and a Master's Degree in OHS, and a Graduate Diploma in Occupational Hazard Management. He sits on many OHS committees and boards that address all manner of issues to do with OHS, has written numerous articles and has presented many papers (both locally and internationally) on a vast range of OHS issues. He is also a guest lecturer at Melbourne University, RMIT University and Federation University and is a strong advocate of the right of workers to be involved in workplace OHS decision making.*

- Similarly there is little information in the applications on specific food safety issues of concern.
- Paradoxically, moving all logistics/traffic to Queen St has the potential to increase the possibility of accidents.
- By removing all vehicles from the lanes between the sheds and all storage to the Trader shed will mean increase in the movement of goods across the market & through the public walkways/aisles.
- The provision of hot water, internet & power to the sheds is a positive initiative, but proposed changes go way beyond what is necessary to achieve this.
- It is a joy seeing goods moved around & displayed in voluminous quantities. The delivery of top-ups to stalls is the hallmark of

turnover & freshness – this is the theatre of our working market. The busy visibility of trader operations behind their stalls in the laneways throughout the trading day is an intrinsic part of the market culture.

## 4.2 Logistics

- The proposals do not preclude the place continuing as a retail precinct but claims that the new proposed plans applied to Heritage Victoria will improve its long-term viability as a market are spurious. The City of Melbourne argues that these changes are necessary for the financial viability of the market yet the vision is clearly evident in the documentation that it will be a much-reduced market space, particularly with the General Traders/Specialty stores being reduced to Sheds C, D, E & F.

Whereas QVM is unique as a traditional produce and specialty market in the CBD, in fact, our historic old city, dear to the hearts of our community, which is why it is more successful in attracting tourists.

Design rationale – The remake of QVM proposes to enhance development of the inner north (not its remit).

- Loading & unloading  
The closing of the car park (contrary to People's Panel recommendation 3) and removal of vehicles from the sheds means that ALL loading & unloading will be moved a constrained area in Queen St between the upper & lower market. Queen St will be closed to other vehicles, as will Therry St. This means that bulk shoppers (who are not all Business to Business) will have to transport their goods manually to the new multi-level car park under the Munro building, or (more likely) go elsewhere.
- Only a limited number of loading bays (5 or 6 across the 2 new sheds) will be provided, meaning each trader will have a limited time frame to unload before 9am. Fruit & veg traders will struggle

to return from Epping, load & unload within this time frame, and hardworking traders who already do long hours will have to start 2 hours earlier for deliveries & set up.

### ***Case study 1: Vic Market high volume fruit & vegetable trader***

- *This PE Leaseholder occupies a large stall renting 10 spaces*
- *It is a family run business – with all operations executed and directed by the family with a small team of employees.*
- *Tasks include: purchasing stock from Epping, unloading, sorting produce for needs for each trading day, storing excess produce then parking the large 12 tonne truck which requires 2 parking bays. Unsold produce is then re-loaded on the truck at the end of trading for storage.*
- *To off-load and reload usually takes 2 employees along with the business owner driving the forklift. For safety, pallets need to be taped up for stacking requiring more time.*
- *The rest of the day is spent at the stall where much of the stock is stored ready for topping up as needed. The remainder, after sorting, is warehoused in the Franklin St warehouse.*
- *Volumes vary eg month of Xmas (often two truck loads are needed), Easter, Mothers' Day, Fathers' Day, are when the demand is higher and so is the volume*
- *The time of year & season impacts on unloading eg in summer there is much produce variety. December- to the end of February are busy months with diverse seasonal summer produce which is often more delicate.*
- *The early morning operation takes at least 1 hour to unload, and position pallets eg from a pallet of oranges purchased a portion eg only 5 boxes, may be required for the day. This operation occurs with the many lines of fresh produce that are sold.*
- *The entire operation is time consuming and complex. If it was to occur in the proposed G shed loading dock it would hold up other trucks queuing to unload creating chaos.*
- *The market is not like a supermarket where trucks arrive, unload and leave leaving the next stage to supermarket employees. Family business are the operators at each stage from trucking to Epping, trucking to QVM, unloading & sorting, stocking to their stall, to warehousing, then parking their large truck, then servicing customers.*

#### *Costs incurred:*

- *\$2,200.00 per week for 10 stands*
- *\$2,400.00 per month for warehouse expense (Franklin St shed)*
- *\$950.00 per quarter for truck parking*
- *\$150.00 per week towards electricity*
- *Plus employee wages*
- *This business relies on quantity/volume turnover to be profitable*

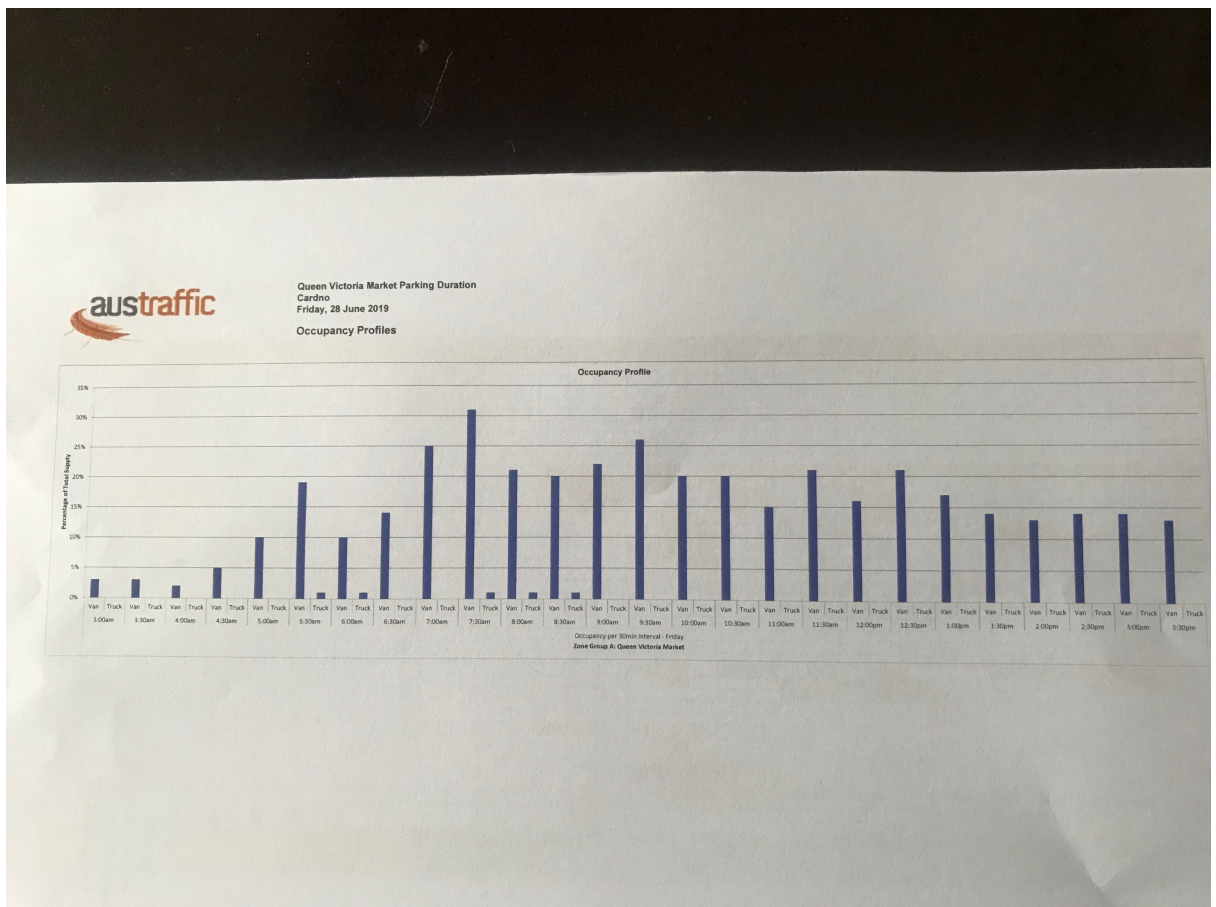
## *H Shed*

- *There are approx 8 fruit & veg vendors in H shed*
- *There is no fruit & veg trader with less than 3 stands to their stalls*
- *Many of these vendors park their trucks (often smaller vehicles) at their stalls to save expenses, to off-load and load more easily & to provide extra, convenient on-site storage for topping up throughout trading hours.*

## **Case study 2: Bill's Farm in the Deli Hall - Malcolm McCullough & Mark Scott (owners)**

- *This business has 65 suppliers & 680 products*
- *Each week orders are made to 50 – 60 suppliers,*
- *Each week 220 products are ordered from 50 suppliers in order to maintain supplies and fresh turn over.*
- *Most deliveries take place between 7am & 2 pm*
- *Tuesday - 20-25 deliveries*
- *Thursday – 15 – 20 deliveries*
- *Friday - 10 deliveries*
- *Many of these small delivery vans park in Therry St. close to the Deli Hall to make their deliveries.*

Insert Cardno Safety & Logistics Management Report Appendix demonstrating delivery times & frequency



- The conflict of vehicles from vehicles backing out from Trader Shed as others pull into Northern shed unloading bays, increases the probability of accidents in this constrained loading time period.
- Traders will still need to move goods from Northern Shed to Trader Shed, and then from Trader Shed to the stalls means triple handling. Furthermore, the viability of their business relies on fruit & veg traders being able to move goods and access storage during trading hours. In OHS terms, there will be more trader vehicles (electric pallet jacks etc) in the shared pedestrian zone (Queen St) than at present.
- It is nowhere explained where traders will park their vehicles after they have unloaded.

Insert Recommendation 5: *‘Developing G Shed for various infrastructure improvements. To utilise the areas at ground and above and below for shed G for the purposes of loading/unloading; waste management, storage, public amenities and beautification.’*

Note: There is no recommendation for a Northern Shed

Recommendation 5	
<b>Recommendation:</b>	Developing G Shed for various infrastructure improvements. <i>To utilise the areas at ground and above and below for shed G for the purposes of : Loading/unloading; waste mgmt; storage; public amenities; and beautification</i>
<b>Description:</b>	<ol style="list-style-type: none"><li>1. Can go to 3 stories above ground Shed G and possibly 3 or 4 stories underground Shed G which can be designed in sympathy to the existing heritage environment</li><li>2. Centralises back-of-house services out of line of vision for customers</li><li>3. To maintain the theatre ambience of the market, separate back of house from front of house, to allow for better customer engagement</li></ol>
<b>Rationale/Reasoning:</b>	<ul style="list-style-type: none"><li>• G Shed is less sensitive to heritage values as it is a 20th century buildings and therefore, this give increased planning and development flexibility and opportunity</li><li>• A previous development application pertaining to shed G (for waste mgmt) has gone before Heritage Victoria and was approved; creating a precedent for utilising this shed for infrastructure purposes.</li></ul>

The proposed Northern Shed was never recommended in the People’s Panel outcomes. It was recommended that all loading/unloading; waste management; storage; public amenities were to be centred in the development of G Shed.



Customers who buy bulk or for weekly family needs and whom the fresh produce traders depend on for profitability (who are not business to business) who once conveniently parked in Queen St between the two halves of the markets as has generations before them, will have to haul, under the proposed plans, their purchases to under Munro car park or to the proposed far distant car park under the southern site south of the storage sheds on Franklin St.

### **4.3 Recycling, waste and sustainability**

Markets by nature are more sustainable than supermarkets but improvements are always welcome.

- The proposal put forward in the plans centred under Queen St are disruptive, inefficient and unnecessarily elaborate. They involve digging big underground trenches down laneways behind the sheds; constructing a slurry-making facility somewhere in the market (not specified); and piping the slurry underground to under Queen St to store and then bringing it back to street level for carting away.
- The trial bio digester in Shed A was a failure. Its instalment was universally disapproved of by fruit & veg traders in the upper market due to its proximity to stalls and the public (a petition to management was signed by all & submitted). Due to its noise and the reek from the processing it had to be shut down during trading hours, leaving inadequate time to achieve the composting it was there to do. In short, QVM management has a terrible track record of badly thought out processes that are not in the interest of traders & customers.
- Alternative strategies for waste management have not been explored with traders. South Melbourne Market is an exemplar – simple, contained, at-grade, cost-effective waste management with many thoughtful innovations in and around the market for recycling. One idea mooted was to pay traders driving empty

trucks on the outward bound journey to Epping Wholesale market to cart organic waste back to its source for farmers to compost.

- Putting a large waste & recycling facility below ground in the centre of the market with access via chutes & lifts is neither efficient nor sustainable. Reinstating the lapsed 2007 permit for a ground level recycling depot should be activated.
- (Insert: People’s Panel Recommendation 7) ‘*Dedicated Recycling station ground level or below in G Shed.*’

Recommendation 7	
<b>Recommendation:</b>	Dedicated Recycling Stations ground level and or below G Shed
<b>Description:</b>	<ol style="list-style-type: none"> <li>1. More Recycling Stations strategically spread around for Customer &amp; Trader convenience</li> <li>2. Five main Recycling / Waste streams will lead to a Sustainable &amp; Cleaner market</li> <li>3. 5 Main streams include: Organics/Cardboard/Commingled(Plastic/Glass Food &amp; Beverage Containers)/Plastic Film (LDPE) &amp; General Waste. Increased resource recovery will lead to time efficient &amp; cost effective market operations</li> <li>4. Recycling Stations Improves OHS / safety due to less movement in around sheds</li> <li>5. Continue with Central Recycling &amp; Waste Transfer Station in G Shed either above ground or below where practical.</li> <li>6. Suggested areas for Recycling Stations could include main walk - ways / centre ways , particularly A &amp; B Shed / Queen St / heavy foot traffic areas &amp; food courts</li> <li>7. Central Recycling area in G Shed may be able to have below ground Meat Rendering &amp; Fish Offal sorting handling area</li> <li>8. Ongoing Education Program for the traders &amp; public critical for success</li> </ol>
<b>Rationale/Reasoning:</b>	<ol style="list-style-type: none"> <li>1. Improves resource recovery rates and therefore reduction in general waste disposal.</li> <li>2. Improved recycling stations will lead to a cleaner &amp; sustainable market</li> <li>3. Easier customer &amp; trader usage and a more cost effective compared to the current system</li> <li>4. Revamped Recycling &amp; Waste System in line with worlds best practice and other markets</li> <li>5. Revamped Recycling improves safety due to less movement and current outdated system</li> <li>6. Visually better recycling/waste system for the benefit of customers &amp; traders</li> </ol>

- Relocating the vast complex of north-south communication cables servicing the north that reside under Queen St where the waste management facility is proposed has not been mentioned in the plans.

#### **4.4 Trader Amenity**

- Claims by the CoM that changes will improve trader amenity and convenience are quite the opposite. Presently traders of the individual businesses upload directly to their stalls, at their convenience. New plans force them to unload to underground storage facilities and then haul to their stalls, possibly at times determined by management.
- Fruit and vegetable traders will have to store produce under the Trader Shed and deliver produce to their stalls once a day, before 9am by electric pallet jacks. Who will serve customers? Does this mean more staff, higher prices? Inevitably stallholders will still need to move goods through the market during the day to top up stock as needed. By eliminating at stall truck parking where many fruit & veg traders store excess produce for topping up during trading hours will result in more haulage of stock through the market from underground storage to stalls.

Continue on next page

## People's Panel Recommendation 1: Review of infrastructure for traders (storage & amenities)

Recommendation 1
<p><b>Recommendation:</b> Review of infrastructure for traders (storage &amp; amenities)</p>
<p><b>Description:</b></p> <p>1. Re-clarify and test initial 'consultations' and data collection process Undertake another more thorough audit of trader wants and needs. Feedback from many of the traders involved in this panel has been that much of the infrastructure (change rooms, showers, lunchrooms) given in our remit is not desired by the traders. Traders are concerned that the gold plating of infrastructure will lead to higher costs and rent to their businesses.</p> <p>There are also questions around whether the amount of storage being offered to traders is excessive, and may not be justified in all cases.</p> <p>It is recommended that a formal review and consultation process be implemented at regular intervals (suggest 2-yearly as a minimum), with QVM management working in closer collaboration with traders to ensure future upgrade work is aligned with trader wants and needs.</p> <p>It is recommended that surveys of traders be conducted by independent auditors to more clearly understand trader infrastructure requirements. The results of these surveys need to be communicated to all traders to provide greater transparency and foster improved collaboration between traders and QVM management.</p>
<p><b>Rationale/Reasoning:</b> Feedback from many traders involved on the people's panel suggests that the infrastructure provided on the second session for placement in the market is excessive and unnecessary. There is a concern that increasing infrastructure to that proposed scale could result in a larger redevelopment than what is needed.</p>

- People's Panel Recommendation 1 –  
Description, paragraph 1: *.. 'much of the infrastructure (change rooms, showers, lunchrooms) given in our remit is not desired by traders .... **Traders are concerned that the gold plating of infrastructure will lead to higher costs & rents to their businesses.**'*

paragraph 2: *'There are also questions around whether the amount of storage being offered to traders is excessive...'*

- There will be extensive economic disruption of market operations with the construction period. In spite of promises of trader security, the movement and displacement of traders during & after the works program, along with the disruption during construction will create uncertainty for customers & traders alike & will most likely add to the continuing attrition of traders.
- While the works are in progress, especially since they concern such a central market location, the market will become significantly less attractive to customers, potentially changing shopping behaviour patterns for the future.
- Specialty stores who form the majority of commerce in the market are completely disregarded in these plans – they will suffer all the disruption while the number of food stalls are diminishing.
- It also seems that traders will need to lease storage facilities in the underground, rather than use their vehicles at no cost, as we note that according to the Economic Justification, trader rents will double after the renewal, in order to pay for this (unnecessary) storage and infrastructure.
- Existing arrangements have enabled generations of new traders, notably recent immigrants, to establish themselves with a minimum of cost and commitment to a minimal amount of infrastructure. This may be particularly significant post COVID – 19 pandemic. Higher overheads post renewal will deter such start-up businesses.
- Inevitably, higher overheads will change the historical trader mix and the traditional scope of the market as a community facility.
- The inevitable loss of the traditional family businesses (foreshadowed in the Economic Justification document) will

significantly alter the way in which the market has always operated and diminish the historical continuity that is so important.

## **Design**

- The new buildings are a serious departure from the tradition of single storey sheds and halls. The proposed northern shed is a distinctly modern idiom. The heritage market will be dominated by both new structures – the Northern & the Traders (G) Shed .

The proposed northern shed is, like the proposed G Shed design, in a foreign architectural style and which includes a large and permanent retail component which will block Queen St and divide the upper and lower markets. The new 'retail space' under the Northern Shed will be massive (43 metres long and 16 metres wide). Together with bollards, furniture and trees, it will separate the two halves of the market along Queen St which is the traditional spine linking the two halves. The roof and underlying structure will disrupt current sight lines across & between the upper and lower market.

## **Social Significance consideration:**

It is clear from the Heritage Impact Statements lodged with the applications that much of the driving force for the proposals is a need (or desire) to address occupational health issues and food handling regulations. Whilst these matters might not seem to deal with social significance, they do have a dramatic impact on the way the market operates.

The interaction of traders, customers and the movement of goods around the site are all integral elements of the social significance. Customers and traders are all well aware of each other and part of the market experience is keeping an eye out for fork lifts and large trolleys loaded with produce. It is part of the market experience seeing replenishment of fresh food, the hallmark of turnover & freshness. (Refer QVM Intangible Values report in point 3 of this submission)

*A personal sensual experience: Mid-Friday morning, Therry St, at metered parking, I witnessed a small van unloading a huge bag of Kabana sausage to a hand trolley for delivery to the Deli section. All that side of Therry St had that particular Kabana aroma. It was mouth watering - I just wanted to follow the trolley to its destination.*

- The movement of customers across Queen Street from Sheds A & B to the Meat Hall is an important link and the proposed northern shed will interrupt this.
- The need for the introduction of a retail space at the southern end of the new building is also puzzling given that there is so much vacant retail space in the existing market sheds.

#### **4.5 Customer amenity**

- The changes of 'modernisation' will inconvenience customers & make the market less attractive by not supporting its point of difference to supermarkets. Storing produce and bulk meat and fish under the Trader Shed introduces a supermarket model of trading, affecting the freshness & turnover of produce by encouraging traders to hold perishables longer.
- Higher overheads invoked by the change of trading practice will result in increase costs of fresh produce which means the market will no longer be able to offer competitively priced fresh produce for low income earners.
- The loss of street parking – Queen St (from Victoria to Franklin Sts), Therry & Franklin Sts will have a deleterious effect on market trade. Figures show that 50% of QVM day market customers arrive by car. Queen St between the two halves of the market, where the proposed Northern Shed and waste management facility is planned, is a vital to the convenience of customers. It also has provision for disabled parking.

Insert: People’s Panel Recommendation 3: ‘500 car parks in Munro car park, PLUS 500 car parks to be maintained in existing locations (Peel St side) with the remaining land to be repurposed into open space.’

Recommendation 3	
<b>Recommendation Heading:</b>	500 car parks in Munro street, plus 500 car parks to be maintained in existing location (Peel Street side) with the remaining land to be repurposed into open space.
<b>Description:</b>	<ol style="list-style-type: none"> <li>1. Improved flow into split parking facilities (Munro &amp; existing) resulting in improved flow into the market</li> <li>2. Greening and beautifying the at grade car park plus 500 spaces. This greened car park could be used flexibly for the night market, and other events on non-market days.</li> <li>3. Principle is that council revisit and reduce parking as required (based on a thorough review of current customer demand for parking and car use in city, and changing customer profiles).</li> <li>4. Council to introduce a easy-to-use parking validation system (at visitor hub) for car parking to ensure QVM car park is not being used by city workers (or other people who are not shopping at the QVM).</li> <li>5. Traders should continue to park within their stalls, or provision should be made in the southern development site.</li> </ol>
<b>Rationale/Reasoning:</b>	<ul style="list-style-type: none"> <li>- Flexible space</li> <li>- Less disruption than underground option</li> <li>- Customer friendly, with choice of above and below ground (Munro) car parking options</li> <li>- Economically viable</li> <li>- Flexible for low cost changes in the future.</li> <li>- In line with supporting the cultural heritage of the market as we know it.</li> <li>- Ability to use this beautified car park and green open area for cultural and social events outside of core/day market hours</li> <li>- Validating parking will ensure that only QVM customers park in the market.</li> <li>- Does not disrupt the cemetery</li> <li>- Customer flow as we know it maintained</li> </ul>

The above parking recommendation, a workable compromise, was immediately rejected at a CoM Futures Melbourne Committee meeting. .

## 5. Economic consequences of refusal;

- The SGS Economic Justification report, commissioned by the applicant (CoM) has been produced to support the application and to show that there is economic benefit from the proposed renewal program. The basic argument is that **if** there is no change to the operational structure of the market, then the financial performance



will deteriorate. Forecasts have been produced to show that the renewal program will produce profits for the future and allow for ongoing maintenance and improvements in addition to pay return to the council. These forecasts are based on assumptions of future revenue.

- With the renewal program, the revenue of QVM Proprietary Limited is projected to increase revenue from \$25 million today to \$45 million in 2028. This is projected to increase the profit from \$500,000 per annum to approximately \$10 million per year. The total estimated cost of the project is \$250 million. Projected return on capital of 4%. This is a non-commercial rate of return given the uncertainty of the revenue projections.

The main increase in revenue is coming from increased rentals to stall holders and leaseholders. This will have a major impact on stallholders and will change the nature of the market and increase prices to the public. The increase in rent may change the type of stallholder.

- The market concept is the simplest form of retailing. In the past the stallholders would bring goods for the day set up, sell his goods and go home if he sold everything he had for the day or temporarily store goods for the next market day and sell his produce at a cheaper price. This model is what maintains value for money in a market environment. The appeal of the current concept is that it has a minimal cost of set up and low barrier to entry. If run correctly it would attract a wide range of products and suppliers.
- Many people can and have started in this way that otherwise could not. Moreover, it is a model that will be particularly relevant to the post COVID-19 pandemic when shell-shocked traders will need to start up & get on their feet again.

Virtually every school in Melbourne visits the market to demonstrate the concept of a “market” in its simplest form and Melbourne’s continual heritage and history.

- The need for more successful traders is critical and this matter needs to be addressed directly through seeking out and assisting new traders to set up. The imposition of difficult/ unworkable, unsafe storage and movement regimes will have the opposite impact, reducing the life and theatre of QVM and the appeal to new traders.
- QVM's reported decline is more about poor management than inadequate facilities or out dated operating modes. Over 5 years QVM has had 4 appointed CEO's and 3 Acting CEOs none of whom have had market retail experience. In spite of poor management including bullying by management, traditional market businesses remain profitable.
- Until 2017 QVM generated significant profits for the CoM which were never invested back into the market. This resulted in it becoming run down.
- There is little publicly available information of the complete market financials. There are no figures available that clearly delineate Night Market & event programs costs from the day market's operation. Are they conflated and therefore present a distortion to the overall figures?
- There are also major capital works –depreciation and maintenance costs – that are not identified in the financial forecasts.
- The economic viability of the market is driven more by having successful traders and satisfied customers and an important aspect of the market's attractiveness to customers is the “non-supermarket atmosphere”

## **In addition**

### **Comments on background and process:**

In 2017, the City of Melbourne was angered and disappointed at Heritage Victoria's rejection of the former Lord Mayor, Robert Doyle's grandiose plans to dismantle heritage sheds to excavate 3 floors down to achieve inflated storage needs, unwarranted and unrequested trader amenities and underground parking (déjà vu?). QVM Board members and QVM staff had demoralised traders by repeated communicating that the application was merely a formality and that a HV agreement was assumed by council.

Many references have been made by the CoM, throughout this current application to consultations with HV, with the tacit implication that many of these points have already been sanctioned by HV.

I was a participant in the People's Panel process and can assure Heritage Victoria that the recommendations cited in the application have been distorted for the purpose of this application.

The recommendations of the People's Panel have been repeated referenced throughout the application document. The references have been disingenuous, manipulative and misinterpreted. They incorrectly imply findings that are not true while giving credence to all points on the Minority Report which mirror the CoM's Master Plan, an unaltered document as for the previous HV application. It should be noted that Recommendation 3 re parking was immediately struck out by CoM at the ensuing Futures Melbourne Committee meeting.

The new applications reflect the Minority Report which is in line with the Masterplan.

During the People's Panel workshops I was witness to the council's initial manipulative intention to corral Panel members to arrive at a conclusion that was in line with the council's Master Plan. It based information in the Information Kit provided, given to all Panel participants as prerequisite background reading, on the need for heavily inflated storage needs & trader amenities.

Joanne Wandel, Program Director, QVM Precinct Renewal verbally communicated to the group HV's rejection of the original plans by cherry-picking selected points from HV's report to support its contention of the need for storage and amenities.

It was early in the People's Panel workshops that the City of Melbourne was successfully pressured into releasing HV's full report giving Panel members HV's rationale in its entirety for thoroughly rejecting these plans. Knowledge of the HV report then precipitated a near walkout by many of the panel participants. New parameters on process were discussed and implemented to reset the workshop to get it on-track which produced, after intense discussion, some of the recommendations inserted in this document.

The six page Minority Report, which was submitted one week after the People's Panel (PP) came to a close, has been given unwarranted prominence. It clearly reflects the CoM's Masterplan and gives direction to the current application before Heritage Victoria. It progresses the old agenda that was formally rejected but now, finds itself in its newest iteration, in the inflated trader needs in G shed and the proposed Northern shed (replacing the once mooted glass pavilion in the same location).

Recommendations were transparently arrived at within the PP workshop process. The Minority Report was written behind closed doors and submitted one week after. Complaints were made to the designated probity person. It is believed the language in this report strongly resembles that of the Renewal team and concerns have been raised as to interference during the Minority Report's incubation.

The findings of the Minority report – none of which were arrived at through the agreed majority during the workshop process:  
Focus on Queen St ( since the PP, Queen St has been added to the Victorian Heritage Register & now has heritage significance)  
Extended hours to mirror CBD trading hours  
Pedestrianisation of the QVM  
Provides a set of options as in the QVM renewal application & all renewal documentation  
Promotes the existing car park becoming an open space to activate the Franklin St storage shed which might become a restaurant precinct,  
Locating market infrastructure on Queen St to facilitate efficiencies  
Excavation of Queen St  
Complains that the decisions made by the much lauded PP were rushed and therefore inadequate.

**Trader consultation:** Any CoM consultation with traders has been carefully crafted to achieve a desirous council intention or outcome. That is, no open questions were asked. It always begins with a shaky premise ‘you have told us you want this. Let’s now discuss how we can achieve it.’ This has been the case for loading facilities and at store point-of-sale design. Some traders refused to participate having experienced this disingenuous process before. No feedback was sought from market traders on the scope of the proposed plans by CoM prior to submitting the application to Heritage Victoria. If consultation with traders is paramount surely this end process of consultation should be essential.

Consultant disclaimer: Note the disclaimer that prefaces the Cadno traffic report - data was supplied by the CoM to which formed the basis of the report and for which it cannot accept veracity.

The plans to Heritage Victoria are an elitist document: Applications to Heritage Victoria by the City of Melbourne (CoM) in its latest bid

to 'renew' Queen Victoria Market ignored the inherent multicultural make-up of the traders at QVM by publishing a very large and complicated set of documents in English only. As a consequence, many traders have effectively been silenced.

Vic Market comprises 100+ Asian traders, 40 of which are Chinese, plus myriad other nationalities whose first language is not English.

The two trader-focussed, extensive and complicated applications put forward for review in English only, if approved, will determine a completely new mode of operation for market businesses. They consist of 6 A4 booklets and 5 A3 books, totalling 365 pages in full colour for market traders to read and analyse in two weeks (15 May). These documents are daunting for busy traders trying to earn a living and who mostly aren't skilled in critical reading. For those who have undertaken the gargantuan exercise of reading and responding to the plans are grateful for the extensions negotiated by Friends of Queen Victoria Market.

Throughout the timing of responding to the HV applications, the Australian community has had to deal with the day-by-day intensifying effect of shut down to contain the Coronavirus. Acknowledging that Heritage Victoria was able to broker two extensions beyond the publicised fortnight, it was unreasonable and irresponsible that the Council did not defer the applications until the pandemic was in hand as this was an unessential undertaking for the times. The General Merchandise stalls were closed (non-essential trading) and the produce stalls were struggling to adjust to the constraints on trading.

Many submissions were made to the council and Heritage Victoria regarding this irresponsible demand on traders and the public to deliver submission during these unprecedented times.

## **Putting the pieces together:**

Superficially the new plan wants us to believe that there has been a substantial rethink, by the City of Melbourne for the future of QVM. Getting on with shed maintenance, implementing an efficient waste management system and extending & upgrading amenities in G shed, wash basins, internet, greening are a positive step forward.

However the devil is always in the detail and on close inspection, not a rethink at all, but a relocation and regurgitation of a previous plan working to the original Master plan.

On scrutiny city designers are 'neatniks', completely uninformed about how a working market operates, its associated cultural significance, and has presented a logistical nightmare for the trading community that is unworkable and an unappealing outcome for customers.

New plans are driven by OH&S that specify no forklifts in the market (I challenge even market management not to use forklifts for heavy event equipment); no trader parking under the sheds; all traders must be unpacked by 9am and all deliveries must be made before 9am. This may be appropriate for a quiet, orderly shopping centre, which is in stark contrast to the market. QVM's point of difference is that it is loved for its theatre, its noise, vibrance, movement and grittiness, value for money offering and style of simple trade.

It is impossible to separate operations and infrastructure. Each works with & supports the other. The knowledge & solutions about dovetailing both are already in the market amongst its experienced traders – no expert consultants necessary. Building on and from trader expertise in operations and logistics rather than relying on outside consultants and off-site bureaucrats would achieve a workable, less obstructive, less intrusive and less costly outcome.

This proposed plan will present a logistical nightmare for traders in terms of when most deliveries take place (between 8am and Noon

– Sweeney report), truck parking, traffic flow, storage and convenience.

The outcome of the proposed plans would be unappealing for shoppers and tourists alike as so much of the market ambience 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, one that is clearly historic, yet subtly contemporary.” Our market has a distinctive, unique character that is testimony to our past and present, and has reputation that is valued exactly for what it is and known world-wide.

Will our vibrant market become an environment where traders, dressed in their QVM peaked caps and QVM aprons, passively stand behind their neat, clean, neatly arranged produce in fixed stalls waiting for 9 am when the doors of commerce open? Well-dressed customers will amble by to the ambience of piped music to buy a few essentials before sitting under a tree or modern canopy (the Northern Shed) at one of the many coffee & gourmet food outlets to reminisce on what once was – our lost social and cultural heritage.

I object to this application and feel it would be a sad day for our Heritage market if Heritage Victoria approves this application.

**Burra Charter:**

We are guided by the Burra Charter regarding the conservation of our precious heritage. It states it all much more elegantly than we can.

**‘The Burra Charter advocates a cautious approach to change: do as much as necessary to care for the place and to make it useable, but otherwise change it as little as possible so that its cultural significance is retained.’**

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