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Re: Queen Victoria Market draft five-year market strategy

Dear Mr Liacos,

We write to you in response to the draft five-year strategy for Queen Victoria Market. Thank you for the opportunity to provide feedback on this important and strategic document.

INTRODUCTION

The National Trust recognises the Queen Victoria Market's National significance as one of the great nineteenth century markets of Victoria. It has been in continuous operation since the 1870s, and is the only Melbourne market to survive from a group of important central markets built by the City of Melbourne.

We also recognise the social and economic significance of the Queen Victoria Market as a record of change and continuity in market activity over a long period and as an important shopping, leisure and meeting place for generations of Victorians and visitors to Melbourne. The complex of enclosed food halls, open sheds, shops, and stores perpetuates distinctive forms of trading, providing tangible continuity from the nineteenth century to the present. The social significance of the Market is reflected in its function as an affordable and diverse retail market serviced by small, independent businesses, from many different cultural backgrounds.

Following Heritage Victoria's refusal of the former permit application for the place in March 2018, the National Trust called on the City of Melbourne and Queen Victoria Market management to work with Heritage Victoria, traders and the community to develop a new scheme to reach an equitable outcome which respects the heritage of the market, and provides for much-needed market infrastructure, maintenance and conservation works. We were therefore strongly supportive of the People's Panel process, which provided an opportunity for the National Trust and other stakeholders to fully comprehend the operational challenges the Market currently faces.

The National Trust is broadly supportive of many of the proposed changes outlined in the Strategy. We believe much of the Strategy is largely in line with the recommendations of the People's Panel, which carefully considered how to balance heritage and operational concerns. Furthermore, we also note the need for a guiding strategy to respond to the additional economic pressure as a result of the COVID-19 pandemic.

However, we have concerns that some of the proposed changes in the Strategy have not been guided by an understanding of the Market's heritage values, and that the required infrastructure to deliver these changes is likely to have adverse impacts on the recognised architectural, historical, and social heritage values of the market.

WHAT IS SIGNIFICANT?

We strongly support the No. 1 Guiding Principle of the Strategy (p. 12) - Protect the Market's Heritage. However, there is a need to further articulate what is meant by "heritage" - both in relation to the built form of the market, and the "intangible" heritage values, such as ongoing practices and patterns of use.

This understanding should underpin the Strategy as a whole, as well as individual initiatives that are proposed. Currently, the Strategy does not clearly define what needs to be protected, and how decision-making is to take this into account.

The following extract from the gazetted Statement of Significance in the National Heritage List for the Queen Victoria Market states:

The Queen Victoria Market has outstanding heritage value to the nation as an outstanding example of an Australian metropolitan food market established in the nineteenth century. The Market contains a substantially intact array of Victorian era buildings and structures, which is unique in its demonstration of all four key building typologies of a market from this period, including open sheds, enclosed market halls, warehouses, and perimeter shops. Together with its continued functioning as a modern day marketplace with a particular emphasis on produce, the layout and integrity of these features are significant aspects of the Market which strengthen its historic value.

Operating for almost 140 years as a food market, and prior to that as a meat market, the Queen Victoria Market has borne witness to the huge changes in food science, technology, transport and communications that have revolutionised the production, distribution and retailing of food. While evidence of these changes can be seen in modern market day practices, the Queen Victoria Market still retains many of its original attributes, liveliness and character.

Furthermore, we note that the "Queen Victoria Market: Intangible Values Report" undertaken by the Digital Ethnography Research Centre at RMIT for the City of Melbourne and Queen Victoria Market Pty Ltd, 2017, found that the Market is commonly understood and valued through sensory experience. This research found that:

Sensory aspects cannot be adequately understood without seeing them as entangled with the other things that people valued: relationships and social connectedness; memory; routines of movement and choice; and contingency and improvisation. Accordingly, changes to the 'look and feel' of the Market - are likely to be seen to alter other highly valued ways of understanding it atmospherically. (p. 23)

Many of the retail and operational changes outlined in the Strategy have the potential to impact the social and intangible values of the market. Unlike the assessment of changes to the built heritage values of a place, which can arguably be understood immediately through design and material choices, the impact on intangible values is much more subtle. This impact may occur slowly over time as invisible and intricate connections are disrupted.

We believe the best practice management of all heritage values - both tangible and intangible - must be guided by an understanding of what is significant. We would also like to reiterate one of the guiding principles of *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013*, which is to take a cautious approach to change and "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" (p.1).

DRAFT MARKET STRATEGY

We note that approval for major infrastructure or material changes outlined in the Strategy has either been granted, or will need to be sought, through the Heritage Victoria permit application process. With this in mind, this submission will primarily provide comments on proposed retail changes which have the potential to impact the social and intangible values of the market.

1. Market research

We noted that it was the strong view of the Panel that further qualitative research should be undertaken to determine what customers and non-customers would like to see at the market. This was clearly outlined in *Recommendation 10: Increased customer focus for the Market*.

We are therefore pleased to see that the proposed changes outlined in the Strategy are guided by market research referenced in the Planning for the Future research report 2021 by Quantum Market Research, QVM Shopper research report 2019 by EY Sweeney, and the Bringing Melburnians Back research report 2019 by Bastion Latitude.

However, we note that the majority of the research was undertaken prior to the COVID-19 pandemic. We therefore recommend that the implementation of the Strategy is evaluated, reviewed, and updated annually to account for economic and demographic market changes as a result of the COVID-19 pandemic.

2. Proposed retail mix

We note that the Strategy proposes to revise the retail mix of the market to increase fresh produce from 24% to 27%, increase hospitality from 8% to 18% and reduce speciality shopping services from 68% to 55%.

The National Trust is not opposed to the revision of this retail mix, and largely agree that this will enable the continued service of current customers, while also helping to attract new customers, in line with the market research.

However, we strongly object to the proposal to increase ready-to-cook or ready-to-eat food offerings, particularly from fresh produce traders under the Open Sheds.

We note the Strategy provides the following justification for exploring this food offering:

*There is demand from existing traders wanting to diversify their offer and prospective traders seeking new opportunities, particularly in the areas of hospitality and 'value-add' fresh produce such as ready-to-eat meals. This demand is largely unmet due to limited leases and lockable trading formats, and in parts, **inadequate facilities to prepare fresh produce**. (p.16) (emphasis added)*

The Open Sheds do not currently have the adequate facilities to support the production of ready-to-cook or ready-to-eat food offerings because their primary use and significance is as a fresh produce market. The infrastructure and space required to enable this kind of service would also have a dramatic and unacceptable impact on the heritage values of the Market. These values are captured in the following extract from the National Heritage List citation:

*It continues to **operate as a city produce and general market**, and exhibits a high degree of social interaction, mixture of cultural experiences and authenticity in its practices, **providing a tangible link to the Market's origins in the nineteenth century**. (emphasis added)*

The infrastructure required for traders to provide value-added food and ready-to-cook options (eg staffing, preparation spaces, packaging) is significantly different to that required to sell fresh produce. We have concerns that an emphasis on encouraging existing and new traders to expand into value-added food will alienate the market's traditional focus on fresh produce, and supporting small local businesses. We are also concerned about the additional refrigeration required for value added-food, which is likely to have an adverse impact on the heritage values of the open sheds.

Furthermore, the Bringing Melburnians Back report by Bastion Latitude in 2019 found that only 22% of visitors and 9% of non-visitors want more semi prepared or ready to eat meals as a reason to visit the Market. This is in stark contrast to the much higher demand for other changes such as more places to sit and extended trading hours.

The National Trust submits that the introduction of ready-to-cook or ready-to-eat food offerings within the Open Sheds is not justified by economic and heritage considerations and cannot be rationalised among the many other changes that are proposed in the strategy. We encourage the de-emphasis or removal of this initiative from throughout strategy.

3. New trading formats

We have serious concerns regarding the introduction of lockable trading formats within the Open Sheds. While we acknowledge that this trading format has been successful in String Bean Alley, and the challenge of attracting new businesses to stall-based trading, we believe that an increase in lockable trading formats within the Open Sheds would dramatically change the open-air market experience.

It was the strong view of the People's Panel that the program of renewal and restoration, "should retain and display all the vibrancy and theatre of a traditional market, including delivery and unloading, **setting up and taking down**" (Recommendation 2) (emphasis added).

Furthermore, the following extract from the National Heritage List citation for Queen Victoria Market notes that:

*Significant features of the market sheds include their open design to allow accessibility and circulation, **absence of permanent stall structures**, layout in regular row pattern flanked by laneways. (emphasis added)*

The National Trust accepts that the provision of storage and services as part of Market renewal is necessary to support the reasonable and ongoing function of the place in its original use as an open-air market. However, we feel that the increase of a 'lockable trading formats' would encroach too far on the traditional retail operations of the Market, and in turn its 'vibrancy and theatre'.

We believe that other initiatives to attract and retain new businesses to the Open Sheds must be explored, and that an increase in the lockable trading formats could have an unacceptable impact on the heritage values of the market. We would welcome the opportunity to provide feedback on design concepts for new point of sale and trading formats, prior to the lodgement of planning applications.

4. In-situ storage

Similar to the comments raised above, we have concerns regarding the introduction of in-situ storage for fresh produce traders operating under the Open Sheds.

We understand that it was the strong view of the People's Panel, including the National Trust, that further work was necessary to determine the extent of additional amenities and storage required by traders, to address concerns that the previously proposed scheme provided a level of infrastructure that was beyond what is desired by traders. We were therefore pleased that the City of Melbourne acted on this recommendation by commissioning the Trader Storage and Amenity Needs Quantitative Research Report, by EY Sweeney, 2019. This research found that 44% of fresh fruit and vegetable traders do not believe they have enough storage, and that currently 55% require storage within their own stall or shop.

The National Trust does not necessarily oppose the introduction of increased storage within the Market, noting that we recently supported the Heritage Victoria permit application to undertake works for the Northern Shed and Trader Shed. However, it is currently unclear what is being proposed, and no information or rationalisation for why in-situ storage is needed has been provided. We would require further information, including detailed designs, to thoroughly assess the impact that in-situ storage would have on the identified heritage values of the Market, and would welcome the opportunity to provide early feedback on concept designs.

5. Movement

We note that retail within the Open Sheds will be reconfigured and consolidated, primarily by moving fruit and vegetables from A and B Shed to the Queen Street end of A-D, and specialty shopping stalls within J, K, L and lower E Shed.

We note that the Intangible Values Report found that 'movement' was crucial to how shoppers and visitors experienced the site. Furthermore, this research found that:

High importance was ascribed to the dedicated routines developed over time to move through and engage with the Market environment. (p. 7)

While we do have some concerns that the reconfiguration of shops and stalls may disrupt the established and refined routines of many regular customers, we also note that 'improvisation' was also found to be a valued and pleasurable aspects of the market environment. The Intangible Values Report notes that:

While routines were important, they were not immutable, and variation from them was a valued part of the Market's sensory experience. This also underpins the key insight that the Market is experienced, understood and valued in terms of motion and movement. (p. 8)

The report further notes that:

Sensory configurations of the site – the smells, sounds, weather, crowds, look of the produce and variety of visitors, the feel of surfaces underfoot or of produce in the hand – were immensely important, and mentioned by virtually all interviewees. (p. 8)

Therefore, the National Trust does not object to the reconfiguration of market shops and stalls as proposed, as long as the overall sensory experience of the market is respected and maintained.

6. Dairy Produce Hall & Meat and Fish Hall

We note that any refurbishment or repair changes to the Dairy Produce Hall and Meat and Fish Hall is subject to approval from Heritage Victoria. The National Trust will provide feedback on these changes when detailed plans and designs are advertised through the Heritage Victoria permit application process.

7. Food Court

We strongly support improved infrastructure and amenities within the Food Court, noting that this was a Recommendation of the People's Panel (Recommendation 6).

We believe the Food Court should continue to offer products which cater to a range of budgets, and recommend including a focus on seeking leasing offers that demonstrate a strong link to Market produce and feature Victorian food and beverages, as articulated in the Strategy in relation to the Munro Community Hub (p. 35).

8. F Shed 'local needs' goods and services hub

We note that the Strategy proposes to transition the retail mix at the Queen Street end of F Shed towards servicing local customers. The Strategy suggests several businesses and services which would require infrastructure and amenity changes to operate under F Shed.

The National Trust requests further information on this proposal to understand how this change would impact the heritage values of the market.

CONCLUSION

In conclusion, the National Trust is broadly supportive of the Strategy, noting the comments raised in this submission. We believe that the Strategy is largely in line with the recommendations of the People's Panel, however further work must be undertaken to balance the economic and operational needs with the social and cultural values of the Market. In particular, we have concerns regarding the emphasis on value-added products, and the provision of fixed market infrastructure and storage in the Open Sheds, both of which may have adverse impacts on the heritage values of the Market.

If you would like to discuss this submission further, please don't hesitate to contact me at felicity.watson@nattrust.com.au or on 9656 9802.

Yours sincerely,



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