

Heritage Council Regulatory Committee

Yarraville Railway Station Complex (H2447)

15 Goulburn Street, Yarraville, Maribyrnong City, Bunurong Country

Hearing – 28 August 2024

Members – Mr David Helms (Chair), Dr Mark Burgess, Mr Michael McMahon

DETERMINATION OF THE HERITAGE COUNCIL

Inclusion in the Victorian Heritage Register – After considering the Executive Director’s recommendation and all submissions received, and after conducting a hearing, the Heritage Council has made the following determinations:

- In relation to Recommendation 1, pursuant to section 49(1)(a) of the *Heritage Act 2017*, that the Yarraville Railway Station Complex at 15 Goulburn Street, Yarraville is of State-level cultural heritage significance and is to be included in the Heritage Register in the category of Registered Place; and
- In relation to Recommendation 2, pursuant to section 49(1)(a) of the *Heritage Act 2017*, that the former Stationmaster’s Residence at 13 Murray Street, Yarraville is of State-level cultural heritage significance as part of the Yarraville Railway Station Complex and should be included within the extent of registration of the Complex; and
- In relation to Recommendation 3, that the Interlocking Railway Crossing Gates (VHR H1028) be removed from the Heritage Register and incorporated into the registration of the Yarraville Railway Station Complex.

Mr David Helms (Chair)
Dr Mark Burgess
Mr Michael McMahon

Decision Date – 26 November 2024

ACKNOWLEDGEMENT

As a peak heritage body, we acknowledge the Traditional Owners of the Country that we call Victoria, as the original custodians of Victoria's land and waters, and acknowledge the importance and significance of Aboriginal cultural heritage in Victoria. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of Aboriginal culture and traditional practices.

APPEARANCES/HEARING SUBMISSIONS

EXECUTIVE DIRECTOR, HERITAGE VICTORIA ('THE EXECUTIVE DIRECTOR')

The Executive Director recommended to the Heritage Council that the Yarraville Railway Station Complex located at 15 Goulburn Street, Yarraville be included in the Victorian Heritage Register, but the former Stationmaster's Residence at 13 Murray Street, Yarraville should not be included in the Victorian Heritage Register. The Executive Director made a hearing submission, submission in reply and presented oral submissions at the Hearing. The Executive Director was represented at the Hearing by Mr Brian Tseng, Heritage Officer, Assessments, Ms Jude Doyle, Principal, Major Projects and Mr Geoff Austin, Manager, Heritage Register.

PETER TURNBULL AND SARAH WHITE ('THE OWNERS')

The Owners of the former Stationmaster's Residence at 13 Murray Street, Yarraville made a submission to the Heritage Council in response to the Committee's directions that a hearing into the Recommendation was to be held. The Owners made an oral submission during the Hearing.

OTHER INTERESTED PARTIES

MARIBYRNONG CITY COUNCIL ('MARIBYRNONG COUNCIL')

Maribyrnong Council made a submission to the Heritage Council pursuant to section 44 of the *Heritage Act 2017*, objecting to Recommendation 2 of the Executive Director's Recommendation. Maribyrnong Council did not request that a hearing be held and did not request to participate in the Hearing. Maribyrnong Council requested that the Section 44 submission, and subsequent submission made to the Heritage Council be considered by the Committee in its determination. Maribyrnong Council attended the Hearing as observers but did not make submissions during the Hearing.

INTRODUCTION/BACKGROUND

THE PLACE

01. On 15 January 2024, the Executive Director made a Recommendation ('the Recommendation') to the Heritage Council pursuant to Part 3, Division 3 of the *Heritage Act 2017* ('the Act'). The Recommendation was a 'split recommendation', containing three separate recommendations:

Recommendation 1:

That the Yarraville Railway Station Complex at 15 Goulburn Street, Yarraville ('the Place') is of State-level cultural heritage significance and should be included in the Victorian Heritage Register ('the Register'), pursuant to section 49(1)(a) of the Act; and

Recommendation 2:

That the former Stationmaster's Residence located at 13 Murray Street, Yarraville ('the Residence') is not of State-level cultural heritage significance and should not be included in the Victorian Heritage Register, pursuant to section 49(1)(b) of the Act; and

Recommendation 3:

That the Interlocking Railway Crossing Gates (H1028) be removed from the Victorian Heritage Register ('VHR') and incorporated into the proposed registration of the Yarraville Railway Station Complex.

02. For clarity, where this determination refers only to the Recommendation, this is to be taken to encompass Recommendation 1, Recommendation 2 and Recommendation 3. In other instances, the Committee will refer to individual recommendations (e.g. Recommendation 1).
03. Where the determination refers to the Place, this includes the features proposed in the Recommendation to make up the extent of registration, being the Interlocking Railway Crossing Gates, Signal Box, Male Toilet Block, Upside Station Building and Booking Hall, Downside Shelter, former Goods Siding, Anderson Street Bus Interchange, Shops and former Railway Signal. For the purpose of this determination the former Stationmaster's Residence is referred to as the Residence.
04. The Place is located on the traditional land of the Bunurong people.
05. The Place is described on page 3 of the Recommendation as follows (a detailed description of each structure is provided as **Attachment 1**):

The Yarraville Railway Station Complex forms part of the Yarraville shopping precinct on Anderson Street. It comprises an upside platform (to the city) along Birmingham Street on the west, and a downside platform (to Williamstown) along Canterbury Street on the east. To its immediate south is the Anderson Street Railway Level Crossing, which contains the former goods siding and the remaining structure of the Interlocking Railway Crossing Gates (VHR H1028). This includes four posts of the former gates, one set of gates to the east of the former sidings, two sets of pedestrian gates and associated fencing. To the east of the complex is the location of the former goods yard, which has been converted into carparks and pedestrian pathways. A former goods yard signal is located within this area, to the immediate east of the downside platform.

06. The Residence is described on page 4 of the Recommendation as follows:

The former Stationmaster's Residence at 13 Murray Street is located on the southwest corner of Murray and Birmingham Streets, to the west of the upside platform. The land parcel was originally trapezoid in shape, with a wider north section and a narrower southern section. The southern section was excised in 1998 and converted into a contemporary housing development. The residence is a freestanding Victorian weatherboard house with an M-shaped hipped roof, set behind an extensive front garden. The southern section of the roof is altered and extended. A corbelled brick chimney projects above the eastern section of the roof, and there is another simpler brick chimney on the east elevation, whose chimneypiece is visible from Birmingham Street. The residence has a symmetrical frontage with prominent tripartite windows and a central door with sidelights and fanlight. All of these are sheltered by a prominent front verandah, which consists of a hipped roof and cast-iron latticework. The original southern (rear) wall line was once aligned with the simple eastern chimney. The wall line was later extended further to the rear of the block (c. 1990s) with a weatherboard addition that is similar to the original front section of the house. The east side of the residence is the location of a later carport with gabled roof form.

07. A historical summary of the Place and Residence is provided as **Attachment 2**.

RECOMMENDATION OF THE EXECUTIVE DIRECTOR

08. On 15 January 2024, the Executive Director made three recommendations to the Heritage Council: (1) that the Place is of State-level significance and should be included in the Heritage Register pursuant to section 49(1)(a) of the Act, (2) that the Residence is not of State-level significance and should not be included in the Register pursuant to section 49(1)(b) of the Act; and (3) the Interlocking Railway Crossing Gates (VHR H1028) be removed from the Register and incorporated into the proposed registration of the Place as per Recommendation 1.

PROCESS FOLLOWING THE RECOMMENDATION OF THE EXECUTIVE DIRECTOR

09. After the Recommendation, notice was published on Friday 19 January 2024 in accordance with section 41 of the Act for a period of 60 days.
10. One (1) submission pursuant to section 44 of the Act was received. The submission was made by Maribyrnong Council, who supported Recommendation 1, but objected to Recommendation 2, submitting that in relation to Recommendation 2, the Residence 'is an important historical element and should form part of the Station Complex Statement of Significance'.
11. Maribyrnong Council did not request a hearing but requested to participate in a hearing if caused by another party. The participation request was subsequently withdrawn in a later submission. Maribyrnong Council requested that the Heritage Council consider all written submissions it had made.
12. As there was no request that the Heritage Council hold a hearing into the Recommendation, the Recommendation and section 44 submission were put to the Heritage Council for decision at its regular meeting on 4 April 2024.

REGULATORY COMMITTEE

13. During its meeting on 4 April 2024, the Heritage Council, pursuant to section 13(1) of the Act delegated the determination to a Regulatory Committee of the Heritage Council ('the Committee').
14. The Committee was duly constituted to consider the Recommendation and all submissions received.

REQUEST FOR FURTHER INFORMATION

15. Pursuant to section 47(1) of the Act, the Committee requested further information from the Executive Director, in relation to the decision to exclude the Residence from the recommended extent of registration.
16. The Committee's request and the Executive Director's response are provided as **Attachment 3**.
17. Following receipt of further information from the Executive Director, the Committee circulated the response to the Owners and Maribyrnong Council, inviting their responses.
18. The Owners and Maribyrnong Council responded, and the Committee formed the view that it would benefit from a hearing.
19. If no request for a hearing is made in a section 44 submission, pursuant to section 46(3)¹ of the Act, the Heritage Council is empowered to conduct a hearing 'in relation to a submission in any other circumstances that the Heritage Council considers appropriate'. The Committee accordingly advised all parties that a hearing would be conducted.

COMMITTEE SITE INSPECTION

20. On 20 August 2024 the Committee undertook an unaccompanied site inspection of the Place, including the interior and exterior of the Residence and exterior of the Place.
21. The Secretariat Project Officer was in attendance, and tenants of the Residence facilitated access to the interior following prior agreement from the Owners. No submissions were sought, made or received during the site inspection.

PRELIMINARY, PROCEDURAL AND OTHER MATTERS

FUTURE USE, MAINTENANCE AND DEVELOPMENT

22. It is not the role of the Committee to consider future proposals or to pre-empt any decisions regarding future permits under the Act. Pursuant to sections 49(1)(a)–(c) of the Act, the role of the Committee is to consider a recommendation and determine whether or not a place, or part of it, should be included in the Heritage Register and, if determined to register, pursuant to section 49(3), to determine categories of works which may be carried out without a permit (permit exemptions).

CONFLICTS OF INTEREST

23. The Chair invited Committee members to consider whether declarations were required to be made in relation to any matters that may potentially give rise to an actual or apprehended conflict of interest. All members were satisfied that there were no relevant conflicts of interest and made no such declarations.

ISSUES

24. The following section is not intended to be a complete record of submissions that were made to the Committee. It is a summary of what the Committee considers

¹ Section 46(3) was repealed from the *Heritage Act 2017* upon commencement of the amended Heritage Act on 1 February 2024. The Executive Director's Recommendation in relation to the Place was made prior to commencement of the amended Act, therefore the former version applied during the Heritage Council's consideration of this Recommendation.

to be the key issues, followed by an explanation of the position that the Committee takes on each key issue. Any reference to the Criteria or to a particular Criterion refers to the Heritage Council's Criteria for assessment of places and objects of cultural heritage significance (updated by the Heritage Council on 1 December 2022) ['Criteria for Assessment']. Please refer to **Attachment 4**.

SUMMARY OF ISSUES

25. The Committee notes that the overarching purpose of the Recommendation, to include the Yarraville Railway Station Complex in the Register, is not the subject of dispute. The Committee agrees that the Place is of State-level cultural heritage significance and should be included in the Register, and observes that the Executive Director, Owner and Maribyrnong Council are also in agreement on that matter.
26. The Committee also notes that Recommendation 3 is agreed to, and that throughout the course of the proceeding no dispute in relation to incorporating the Interlocking Railway Crossing Gates (VHR H1028) into the extent of registration of the Place was raised.
27. While the general purpose of the Recommendation is not in dispute, it is the content of Recommendation 1, and Recommendation 2 that form the basis of the Hearing and the Committee's determination.
28. The Executive Director and Owner each made submissions indicating their views that the Residence is not of State-level significance and should not be included in the Register. The Executive Director and Owner submitted that inclusion of the Residence within the extent of Registration would not elevate the significance of the Place as a whole nor contribute to the understanding of the Place as a complex.
29. Maribyrnong Council disagreed with the Recommendation and made written submissions supporting inclusion of the Residence within the extent of registration of the Place and the Statement of Significance.
30. Maribyrnong Council also made submissions in relation to the Executive Director's recommendation that the Residence be referred to the relevant planning authority (Maribyrnong Council) for consideration for an amendment to the planning scheme. Maribyrnong Council submitted that to include the Residence under a Heritage Overlay while including the Place in the Register is a 'disjointed method of heritage protection and relies on two separate authorities to apply the protection and administer the change'.
31. The remainder of this determination relates primarily to the content of Recommendation 1 and Recommendation 2.

COMMITTEE COMMENTS ON RECOMMENDATION

32. The Committee wishes to express its views in relation to the Recommendation before discussing its reasons for making the determination.
33. As previously stated, the Committee does not wholly disagree with Recommendation 1 and agrees that the Complex should be included in the Register. It is the content of Recommendation 1, particularly the list of features that form the Place, and Recommendation 2, that warrants discussion.
34. As outlined in the request for information of 29 April 2024 (**Attachment 3**), the Committee found that the Recommendation did not include adequate information

in relation to the Residence and notes that the Executive Director's assessment in relation to the Residence was not mentioned in the 'Assessment of the State-level cultural heritage significance of the Place' (pages 17–24 of the Recommendation).

35. The Executive Director states on page 16 of the Recommendation that 'the former Stationmaster's Residence is assessed to have not met the VHR threshold and is thus recommended to be excluded from the proposed registration'. The Committee did not have the benefit of that assessment when considering the Recommendation.
36. During the hearing, the Committee queried the Executive Director's approach to the Recommendation. The Committee raised the example of the shops and the former goods siding which it noted did not display a high degree of integrity, and with respect to the interior of the shops, had been heavily altered. The Committee noted that those and possibly other features of the Place proposed for inclusion, may not meet the threshold for State-level significance in isolation. The Committee queried whether the findings of the Recommendation would be the same if the Criteria for Assessment had been applied to each individual feature.
37. The Executive Director responded, advising that assessments of complexes or precincts don't usually involve the assessment of each individual feature against the Criteria for Assessment. The Executive Director noted that in this instance the features that were proposed for inclusion within the extent of registration were those that, in his view, had a high level of intactness, integrity and authenticity.
38. The Committee acknowledges the Executive Director's submission that no feature of the Place was subject to individual assessment. However, the Committee notes that the Criteria and Threshold Guidelines do not appear to have been applied to the Residence in the same way that they were applied to other features within the complex. The Committee finds the approach between the features recommended for inclusion in Recommendation 1 and the Residence to be inconsistent.

COMMITTEE COMMENTS ON COMPARATIVE EXAMPLES

39. The Committee is of the view that its consideration of whether to include the former Stationmaster's Residence was not aided by the comparative examples provided in the Recommendation. The Executive Director's Recommendation for the former Stationmaster's Residence referenced three comparisons, none of which – in the Committee's view – were directly comparable. The subsequent Executive Director's hearing submission to the Committee includes a different list of seven former Stationmaster's (or railway staff) residences included in local heritage overlays but there is no explanation of how these form useful comparators.
40. The Committee notes that of the examples cited, only Maldon forms part of an extant and relatively intact railway station complex like Yarraville. When questioned by the Committee the Executive Director was not able to identify any other railway complexes in Victoria like Yarraville that retain a detached stationmaster's residence.
41. The Committee found that the comparative analysis in the Recommendation treats all former railway residences the same, regardless of design, build date or style. The Committee accepts the need to avoid too many qualifiers, but just as Victorian houses and Edwardian houses are distinct classes of place, so too are Victorian and Federation railway houses. In the Committee's view it is not helpful

to directly compare the Victorian era Yarraville residence with the Federation era former Stationmaster's House at Maroona, cited by the Executive Director as a comparison.

CRITERIA FOR INCLUSION

42. The Committee agrees with the Executive Director's assessment that the Place meets the threshold for inclusion in the Register pursuant to Criterion A, Criterion B and Criterion D.
43. The Committee finds that the Residence meets the threshold for inclusion pursuant to Criterion A and Criterion D and should therefore be included within the extent of registration of the Place. The Committee's reasons are outlined below.

CRITERION A – IMPORTANCE TO THE COURSE, OR PATTERN, OF VICTORIA'S CULTURAL HISTORY

Summary of submissions and evidence

44. The Executive Director's Recommendation found that the Place [excluding the Residence] met Step 1 and Step 2 of the State-level threshold tests for Criterion A in the Criteria for Assessment. The Executive Director's assessment found that the Place has a clear association with the historical phase 'linking Victorians by rail, tram and bus' and that the Place allows that association to be better understood than most other similar railway station complexes.
45. The Executive Director's assessment found that while 'a great many places and objects in the State are associated with the phase, the Yarraville Railway Station Complex demonstrates the development of the place from a minor station to a major passenger hub and freight centre of the metropolitan network'. In the Executive Director's view, the 'level of intactness of the place allows it to be better understood than most other similar places'.
46. In written hearing submissions, in relation to Criterion A, the Executive Director submitted that the Residence is likely to be one of the earliest surviving examples of a purpose-built, freestanding stationmaster's residence in the State, and is clearly associated with the development of the Victorian railway network. The Executive Director also submitted that the Residence demonstrates a clear association with the Place through documentary evidence.
47. However, the Executive Director submitted that in his view, the Residence has an insufficient level of intactness and integrity to contribute to the overall significance of the Place. The Executive Director submitted that subdivision and development at the rear of the Residence, internal and external alterations, and a change in the surrounding site context mean that in his view, the Residence does not form a critical component contributing to the cultural heritage significance of the Place at a State-level.
48. The Executive Director reiterated this position orally during the Hearing, concluding that to add the Residence to the Place would not elevate the significance of the Place, nor would it add any knowledge to the understanding of the Place as a complex.
49. In their submission, the Owners agreed with the Executive Director's view that including the Residence within the extent of registration would not add value to the listing. The Owners submitted that to live in, the Residence does not feel as if it is part of the complex.

50. The Owners further submitted that to include the Residence within the extent of registration of the Place would not add anything of value as there is nothing unique about the Residence to be protected.
51. The Owners queried whether inclusion of the Residence within the extent of registration of the Place would reduce the integrity of the Place overall, noting that the Residence is not rare and in the Owners' view, has a low level of integrity itself.
52. The Owners also submitted that the Residence looks like any Victorian residence and that it is hard to identify from the side view [facing West from the upside building] due to the carport and fencing.
53. Maribyrnong Council disagreed with the Executive Director's Recommendation and made submissions advocating for the inclusion of the Residence within the extent of registration of the Yarraville Railway Station Complex 'due to its significance to the State as an example of a complete late nineteenth century suburban station complex'.
54. Maribyrnong Council submitted that 'inclusion of the former Stationmaster's Residence in the extent of registration would add value to the VHR as this would become the first complete suburban station complex added to the register'.
55. In submissions made prior to the hearing and following circulation of the Executive Director's response to the Committee's request for information (**Attachment 3**), Maribyrnong Council disagreed with the Executive Director's assessment that the Residence is visually excised from the Place. Maribyrnong Council submitted that the Residence is still visually connected, due to its proximity to the Place (specifically the upside station building).
56. Maribyrnong Council submitted that the original context of the Place and Residence was as a 'thriving transport hub' and used historic plans² to assert that the Place was developed within an existing suburban context, rather than the suburban context developing around it, and thereby changing the original site context as was submitted by the Executive Director.
57. In response, while the Executive Director accepted that the Residence is in close proximity to the Station, he also submitted that the relationship between the Place and Residence is not readable by readily identifiable building fabric. The Executive Director submitted that the relationship can only be read and understood through documentary or historical evidence.

Committee discussion and conclusion

58. The Committee agrees with the finding of the Executive Director that the former Stationmaster's Residence is likely to be one of the earliest surviving examples of a purpose-built, freestanding stationmaster's residence in the State and is clearly associated with the development of the Victorian railway network. The Committee also agrees that the association can be read in documentary evidence, but disagrees that the association cannot be read physically or through any building fabric.
59. In the Committee's view the Executive Director's hearing submission, in which the above finding is stated, demonstrates that the Residence meets Step 1 of the Criteria for Assessment. It has a clear association with the phase 'linking

² Maribyrnong Council referred to the 'Plan of Remaining Allotments for Sale at the Township of Yarraville by Biers Henningham & Co', 185? and part of the 'Plan of the Borough of Footscray', 24 January 1877.

Victorian's by rail' (A1), that phase is of historical importance (A2), and there is evidence of the association of the phase with the Residence (A3).

60. The Committee observes that the Executive Director's assessment notes that the Residence was likely completed by late 1887, following construction of new timber buildings including an L-shaped waiting room and freestanding booking office. Evidence reveals that the waiting room burnt down in 1892, and the brick railway station buildings present today were constructed in 1893 to the favoured design principles of Charles Speight with modifications over the subsequent years.
61. If the historic information is accepted, the Committee observes that the Residence is therefore the oldest building in the Yarraville Railway Station Complex and the only one that today represents the originally constructed complex. The Committee therefore disagrees with the Executive Director's submission in relation to the Residence having an insufficient level of intactness and integrity.
62. The Committee disagrees with the Executive Director's submissions in relation to the site context being so altered that the relationship between the Residence and the Place can no longer be read. Firstly, as per the historic plans submitted by Maribyrnong Council, the Committee note that the Residence was not originally conceived as an isolated residence, but instead, was always intended to be part of the residential streetscape. Secondly, having established that the site context has remained substantially the same (as a residential streetscape), the Committee is not convinced that changes to the context of the Residence diminish the visual connection between the Residence and the Place, to the extent that the historic relationship can no longer be understood.
63. The Committee is of the view that the statements by the Executive Director in relation to changes to the site context overlook the changes that occurred at the Place over time. For example, the original upside station building was originally closer to Anderson Street (that is, further away from the site of the residence).
64. The Committee notes that the provision of staff accommodation was an integral part of railway station design from the nineteenth until the mid-twentieth century. Until the 1880s stationmaster's residences were provided within railway stations and from around 1886 in detached residences in proximity to the station. The Executive Director accepts in his response to the Committee's request for further information, that the example at Yarraville is likely to be among the early examples of a detached stationmaster's residence.
65. Having consideration of the Criteria for Assessment, the Committee finds for the above-mentioned reasons that if the Residence had been included as a feature in the railway complex, the assessment of SA1 of Criterion A would be met. The Committee does not find that the integrity of the overall Place would be diminished by inclusion of the Residence, nor that the integrity of the Residence diminishes the ability for the Place to be understood and appreciated. On the contrary, the Committee finds that the Residence is an essential feature of the Place and contend SA1 is satisfied with the Residence included.
66. It is the Committee's view that the Residence (in combination with the features that make up the Place) contributes to the association of the Place with the historical phase and contributes to an understanding of the historic development of railways in Victoria.
67. **The Committee finds that Criterion A is satisfied at the State-level and the Residence should be included within the extent of registration of the Place.**

CRITERION B – POSSESSION OF UNCOMMON, RARE OR ENDANGERED ASPECTS OF VICTORIA’S CULTURAL HISTORY

Summary of submissions and evidence

68. The Executive Director recommended that the Place met the Step 1 and Step 2 tests for Criterion B.
69. The Executive Director recommended that the Place demonstrated that SB2 was met specifically through inclusion of the Interlocking Railway Crossing Gates with their significance already recognised through inclusion in the VHR (H1028). The Railway Crossing Gates are unusual features, they are of note, and they are not widely replicated in Victoria.
70. The Executive Director submitted that while the Residence is an early example of a free-standing stationmaster’s residence, it could not be said to be rare. The Executive Director submitted that there are several examples of stationmaster’s residences covering a range of architectural styles, eras and construction materials.
71. In relation to uniqueness, the Owners submitted that the Residence is not unique and looks like other Victorian era residential buildings.
72. Maribyrnong Council submitted that the Residence should be included in the Register pursuant to Criterion B³, as the ‘first complete suburban station complex added to the Register’.
73. Having regard to the Committee’s RFI, the Executive Director stated in his hearing submission that the potential claimed rarity of the Residence as a ‘freestanding, early example of a Victorian, purpose-built station master’s residence’ depended on too many qualifiers. The Executive Director submitted that in this case Exclusion Guideline XB2 was met.
74. The Executive Director also submitted that although none of the station master’s residences currently in the Register are free standing or located on land that is remote or removed from the core railway buildings (like at Yarraville), this feature alone does not mean it is rare, uncommon or unusual relative to other examples in the Register.

Committee discussion and conclusion

75. On the basis of the evidence submitted, the Committee accepts the Executive Director’s view that the Residence is not a rare example individually and its location remote of the core railway buildings does not mean it is rare, uncommon, or unusual.
76. Having said that, the Committee is of the view that the comparative analysis in the Recommendation is not adequate. If it is the case that other, more appropriate, comparative sites cannot be identified then this of itself may provide evidence of rarity.
77. **In relation to the Place and Residence, the Committee finds that Criterion B is not satisfied at the State-level.**

³ Page 5 of Maribyrnong Council’s submission of 13 June 2024.

CRITERION D – IMPORTANCE IN DEMONSTRATING THE PRINCIPAL CHARACTERISTICS OF A CLASS OF CULTURAL PLACES AND OBJECTS

Summary of submissions and evidence

- 78.** The Executive Director submitted that the Place meets the Step 1 and Step 2 tests for Criterion D.
- 79.** As discussed above at paragraph 37, during the Hearing, the Executive Director submitted that each feature of the Place (being the Interlocking Railway Crossing Gates, Signal Box, Male Toilet Block, Upside Station Building and Booking Hall, Downside Shelter, former Goods Siding, Anderson Street Bus Interchange, Shops and former Railway Signal) was not assessed individually against the Criteria for Assessment but that overall, the Place is a notable and fine example of the class of ‘railway station complex’.
- 80.** In relation to the Residence, the Executive Director’s hearing submission stated that while the Residence does demonstrate the principal characteristics of the class ‘railway staff accommodation’ in its built fabric, it is not considered to be a notable example of that class.
- 81.** The Executive Director submitted that the integrity of the building has been affected by changes in recent decades. The changes include subdivision and development of a double-storey residential development at the rear of the property, alteration to the roof form, and addition of a large rear extension to accommodate a contemporary kitchen and living room.
- 82.** In the Executive Director’s view, these changes have altered the integrity of the Residence in a way that differs to the other features proposed for inclusion in the Register, which, in the Executive Director’s view maintain their integrity and historical function.
- 83.** Maribyrnong Council made submissions relating to the integrity of the Residence, submitting that the addition of a large rear extension should not preclude the Residence from being of State-level significance. Maribyrnong Council submitted that the front portion of the Residence ‘retains its assumed four-room plan.’
- 84.** In response, the Executive Director submitted that the changes to the Residence have had an impact on the integrity of the Residence and that it does not display the high level of intactness and authenticity that is displayed by other features of the Place.
- 85.** During the Hearing, the Committee asked the Executive Director to identify at what point in the history of changes to the Residence did the relationship to the Place become, in his view, unidentifiable.
- 86.** The Executive Director responded, submitting that the association of the Residence to the Place, and its former use as a railway station master’s residence can only be interpreted through historical records or documentary evidence. The Executive Director submitted that on that basis it was assessed that the Residence was of local significance only. The Executive Director further submitted that the kind of visual connection between the Place and Residence that was raised in submissions by Maribyrnong Council, can be demonstrated by any Victorian residence in close proximity to any Victorian era railway station.
- 87.** The Committee further queried the Executive Director’s submissions in relation to the asserted low integrity of the Residence and asked the Executive Director what the most determinative factor in the assessment of the Residence was.

88. The Executive Director responded, noting again that the Criteria for Assessment were not applied to individual features, but that an inspection of the Place and Residence revealed, in his view, that the features proposed for inclusion in the Register demonstrate a much higher level of integrity than the Residence. The Executive Director submitted that the other features proposed for inclusion are essential to the core functioning of the railway, and still demonstrate that function today, while the Residence does not.

Committee discussion and conclusion

89. The Committee is concerned about the methodology used to assess the Residence and that it is being held to a higher standard than other features within the complex. The Executive Director submitted that the Yarraville Railway Station (including the Residence) was assessed as a complex. However, statements made in the submissions in relation to Criterion D, by the Executive Director to the Committee and indeed Recommendation 2 itself suggest otherwise. For example, the Executive Director submitted that:

It is noted that the Step 2 State-level test for Criterion D is not that a place is merely representative, but that it is 'notable, being fine, influential, or pivotal'. Although the former Stationmaster's Residence is an early example, it is not considered to be a notable example of the class of railway staff accommodation.

The ED notes that there are several examples of accommodation for railway staff recognised for their heritage significance, both in the VHR and at the local level. These examples include several stationmasters' residences which are notable for their high built quality and decorative detailing or display a higher level of integrity.

90. In the Committee's view this indicates the Residence was assessed as an individual feature, not as a contributory part of the railway complex. The Committee questions if the same test was applied to other features recommended for inclusion within the complex (with the exception of the Interlocking Railway Station Gates) whether they would individually satisfy this threshold. For example, almost nothing remains of the former Goods Siding, which today reads as a car park.
91. The Committee is not convinced by the finding of the Executive Director that the external alterations to the former Stationmaster's Residence are a sufficient reason to exclude it from the extent of registration. The Committee is also of the view that the internal changes to the residence are not of relevance in terms of understanding and appreciation of the historic relationship between the Place and Residence.
92. The Committee accepts that individually, the Residence is not a notable (fine, influential or pivotal) example of the class of 'railway staff accommodation'. However, if included as a contributory feature within the railway complex (and thereby being subjected to the same analysis as was applied to the other features), the Committee is of the view that the Residence does contribute to the significance of the Place pursuant to Criterion D.
93. **The Committee finds that Criterion D is satisfied at the State-level and the Residence should be included within the extent of registration of the Place.**

PERMIT EXEMPTIONS

94. Pursuant to section 92(1) of the Act, the Heritage Council, on the recommendation of the Executive Director may determine categories of works or activities which may be undertaken in relation a registered place without a permit.
95. The Executive Director submitted 'without prejudice permit exemptions' during the course of the proceedings, provided as **Attachment 6**.
96. **The Committee agrees with the Executive Director's proposed permit exemptions.**

CONCLUSION

97. The Committee thanks all interested parties for their submissions and participation in the Hearing.
98. After considering the Executive Director's recommendation and all submissions received, and after conducting a hearing, the Heritage Council has made the following determinations:
 - In relation to Recommendation 1, pursuant to section 49(1)(a) of the *Heritage Act 2017*, that the Yarraville Railway Station Complex at 15 Goulburn Street, Yarraville is of State-level cultural heritage significance and is to be included in the Heritage Register in the category of Registered Place; and
 - In relation to Recommendation 2, pursuant to section 49(1)(a) of the *Heritage Act 2017*, that the former Stationmaster's Residence at 13 Murray Street, Yarraville is of State-level cultural heritage significance as part of the Yarraville Railway Station Complex and should be included within the extent of registration of Complex; and
 - In relation to Recommendation 3, that the Interlocking Railway Crossing Gates (VHR H1028) be removed from the Heritage Register and incorporated into the registration of the Yarraville Railway Station Complex.

ATTACHMENT 1

Detailed description of each structure taken verbatim from pages 3–4 of the Executive Director’s Recommendation of 15 January 2024.

Structure	Description
Former signal box (1927)	<p>The former signal box is a double-storey brick building located to the immediate south of the upside platform. The building has a hipped roof with later metal cladding, with several rectangular window and door openings with prominent lintels and sills. All of the window openings are currently boarded up for security reasons. A balcony with metal balustrades encircles the entire upper level. Internally, the upper level is the location of the former operator’s office, which still retains the original levers and frame for controlling signals and siding points, and a capstan for the operation of the Interlocking Railway Crossing Gates (VHR H1028). The ground floor was not inspected during the site visit.</p>
Male Toilet Block (c.1893)	<p>The male toilet block is an open-roofed, bi-chromatic brick building, featuring prominent red brick banding and an arched entrance with brick header. Internally the building comprises original ceramic urinals and a row of four toilet cubicles, constructed in brick consistent with the block.</p>
Upside Station Building (1893) and Booking Hall (1922)	<p>The Upside Station Building is a substantial poly-chromatic brick (red, brown, black) building with stone footings. On the east (the platform side), a substantial verandah with fluted metal posts extends along the width of the platform. On its north is the location of a weatherboard female toilet block with later internal fitouts. The building has a prominent hipped roof with later corrugated iron cladding. It features a large bi-chromatic brick chimney on the north. Another smaller, bi-chromatic chimney punctures the roof fall on the eastern (platform) side. It is understood that this chimney may have been relocated from the south of the roof to its current position, when the Booking Hall was constructed in 1922. Tinted terracotta eave brackets extend beneath the roof form. The Upside Station Building has a symmetrical frontage on its west (Birmingham Street) elevation and is dominated by a projecting central gable, sheltering the main entrance below (altered in 1922). The east elevation features the original door into the office and two prominent arched openings into the waiting areas. Several former openings are infilled by brick. The building retains most of its internal fabric, most of which is concealed by contemporary office fitouts. On its south, the Upside Station Building extends into a Booking Hall (1922) constructed with red brick. The Hall is a rectangular building and contains a prominent parapet containing inverted arches, concealing its shallow-pitched roof. On the west, the former window opening with stone sill is currently infilled with brick. The south and east elevations contain a large arched opening each providing access to the street level and onto the platform. To the south of the Booking Hall, a 1922 pedestrian ramp, with brick posts and metal palisade fences, connects the building with the street level.</p>
Downside shelter (c.1916)	<p>The downside shelter is an elongated, single-storey Edwardian weatherboard structure located on the southern end of the downside platform. It contains a lockable former booking office on the south and a recessed waiting area on the north. The shelter has a gabled</p>

	<p>roof clad with later corrugated iron, and timber eave brackets extend beneath the roof. An extensive overhanging canopy projects forward on the western side of the building. A row of timber valances extend along its underside.</p>
Shops (1935-36)	<p>The two brick shops are located on the eastern side of Birmingham Street with their rear elevation directly abutting the upside platform.</p>
Bus Interchange (c.1946-48)	<p>The Bus Interchange contains two cream-brick toilet blocks (north and south) connected by a roof with an open waiting area underneath. The toilet blocks have a barrel roof form, which extend into the central waiting area. The internal space of the toilet blocks contain contemporary toilet Statement of Recommendation from the Executive Director, Heritage Victoria Yarraville Railway Station Complex (PROV H2447) Page 4 OFFICIAL facilities. A tall tower abuts each toilet block and has splayed corners embellished by red-brick quoining. Later projecting lamp posts are located on top of the towers.</p>
Stationmaster's Residence (c.1887)	<p>The former Stationmaster's Residence at 13 Murray Street is located on the southwest corner of Murray and Birmingham Streets, to the west of the upside platform. The land parcel was originally trapezoid in shape, with a wider north section and a narrower southern section. The southern section was excised in 1998 and converted into a contemporary housing development. The residence is a freestanding Victorian weatherboard house with an M-shaped hipped roof, set behind an extensive front garden. The southern section of the roof is altered and extended. A corbelled brick chimney projects above the eastern section of the roof, and there is another simpler brick chimney on the east elevation, whose chimneypiece is visible from Birmingham Street. The residence has a symmetrical frontage with prominent tripartite windows and a central door with sidelights and fanlight. All of these are sheltered by a prominent front verandah, which consists of a hipped roof and cast-iron latticework. The original southern (rear) wall line was once aligned with the simple eastern chimney. The wall line was later extended further to the rear of the block (c.1990s) with a weatherboard addition that is similar to the original front section of the house. The east side of the residence is the location of a later carport with gabled roof form.</p>

ATTACHMENT 2

Development of the Yarraville Railway Station Complex

Taken verbatim from pages 7–9 of the Executive Director’s Recommendation of 15 January 2024.

Year	Development
1871	The official opening of the station. It was small in scale and comprised mainly temporary platforms and simple timber shelters for passengers. ⁴
1871-early 1880s	The station was soon proved inadequate for the growing population, industries, and businesses in Yarraville. Throughout the 1870s and 80s, the local community demanded better services and station facilities to accommodate the increasing numbers of passengers. The platforms had become too narrow, and the ticket office was too close to the Anderson Street Level Crossing, creating a hazardous environment for rushing commuters, which resulted in several fatal accidents.
1883-87	In 1883-87, major upgrade works at the station finally took place, significantly expanding the complex. These works consisted of the opening of a new goods siding to the east, the widening of the platforms and construction of the first permanent station buildings (see below).
Early 1880s	Opening of Goods Siding . This short section of track departed the main line on the south of Anderson Street. It ran alongside the downside platform and re-joined the railway track near Castlemaine Street on the north.
1884	A set of hand-operated crossing gates were installed on the Anderson Street level crossing by 1884.
1885	<ul style="list-style-type: none"> • The upside and downside platforms were widened, with pedestrian ramps created on the southern end of both platforms to provide better access. • A footbridge was constructed over the railway line to connect both sides of the station and provide safer access for passengers. • New buildings, including a waiting room and booking office, were proposed for the upside. The contract was granted to WE White, who completed these timber buildings by February 1886 in accordance with plans designed by the Victorian Railways. The designer remains unclear.⁵ The works included: <ul style="list-style-type: none"> - An L-shaped waiting room building, which contained men’s and women’s waiting areas. It had a northern extension projecting onto Birmingham Street (then Sydney Street).

⁴ Yarraville – To the editor of the Age”. The Age, 19 September 1873, p 3.

⁵ PROV, VPRS 17077/P1, Contract No 2309/1403 and 2158.

Year	Development
	<ul style="list-style-type: none"> - A freestanding booking office located further southwest, with its front façade (with verandah) facing north. • On the downside, a galvanised-iron shelter shed was already in place, as depicted in the 1885 plan.
1887-88	<p>In January 1887, the Victorian Railways awarded the tender to construct a Stationmaster’s Residence in Yarraville to PJ Corbel.⁶ The weatherboard residence, as depicted in the 1885 plan, was to be located on the Victorian Railways land (now 13 Murray Street) to the immediate west of the Yarraville Railway Station. Evidence suggests the residence was completed by late 1887. The first resident Stationmaster was William Arthur Gregory, who moved there by January 1888 and remained until c.1892.⁷ The house continued to function as a Stationmaster’s Residence until at least the 1940s, providing accommodation for Frank Hattam (1892), John Dewsnap (1896), Charles Owen (1900-1910s), William Deacon (1920), Timothy Gleason (1925) and Marcus O’Donnell (1930-45).⁸ The residence remained a Victorian Railways property until 1996.⁹ In the early 1890s the Stationmaster’s Residence was separated from the Yarraville Railway Station Complex through the creation of an easement (Birmingham Street). It became part of the residential streetscape of Murray Street following the subsequent housing development of that street.</p>
1890	<p>The Interlocking Railway Crossing Gates (VHR H1028) on Anderson Street were installed.¹⁰</p>
1892-93	<p>The upside waiting room building burnt down on the 22 July 1892.¹¹ In December, Victorian Railways granted a contract for new station buildings to Richard L Gray. In 1893, Gray completed the brick Upside Station Building based on the Victorian Railway design. The identity of the designer remains unknown.¹² The contract specification mentions both ‘ladies toilets’ and ‘lavatory’, implying that the Male Toilet Blocks were constructed at the same time.</p> <p>Andrew Ward observes that the Upside Station Building was consistent with the design principle favoured by Charles Speight (1838-1901), Victorian Railway Commissioner from 1883-92.¹³ Speight preferred grand, solid and well-planned station buildings. He applied this design approach to many of the station buildings constructed during his tenure. Other comparable examples in the late 1880s include Brighton Beach (1889, VHR H1077) and Ringwood (1889, VHR H1587).¹⁴ Altogether with the Yarraville Upside Station Building, these station buildings are assessed by Ward as being the standard designs that ‘marked the close of the Speight era.’¹⁵</p>

⁶ “Railway Tenders”, The Herald (Melbourne), 4 Jan 1887, p 3.

⁷ City of Footscray Rate Book

⁸ Sands and McDougall Directories

⁹ Certificate of Title Volume 10269 Folio 488

¹⁰ Heritage Victoria. Statement of Significance for Interlocking Railway Crossing Gates (H1028).

¹¹ Fire at the Yarraville Railway Station” in Melbourne Weekly Times, 23 July 1892, p 15.

¹² PROV, VPRS 17077/P1, Contract No 4956/2411

¹³ Ward (2019) Story of stations, p 256

¹⁴ Ibid, pp 253-256.

¹⁵ Ibid, p 253.

Year	Development
1893-94	Further Goods Siding work took place, as depicted in the 1891 plan (revised in 1893-94, see below). Another set of tracks was constructed to the east of the sidings as to provide standing rooms for trucks. The standing room was later extended further northward and re-emerged with the railway line at the Somerville Road Level Crossing.
1900-10s	By the early 1900s, the Yarraville Railway Station had become a major passenger hub and freight centre on the Williamstown Line. In the 1910s, a more substantial timber Downside Shelter with gabled roof was constructed on the south end of the downside platform. The cast-iron shelter and booking office were subsequently removed. The Downside Shelter is captured by the 1910s photo taken from the Anderson Street Level Crossing.
1916	A pedestrian subway was constructed in 1916 to replace the footbridge. ¹⁶ It is speculated that the footbridge was removed to accommodate the overhead infrastructure required for the electrification of the metropolitan network.
1920	Electrification of the Williamstown Railway Line.
1922	<ul style="list-style-type: none"> • Further works took place at the brick Upside Station Building, including internal reconfiguration, alteration to the front (Birmingham Street) entrance and relocation of a chimney. The original southern chimney was removed and relocated to its eastern elevation. • A brick Booking Hall was constructed on the south elevation of the Upside Station Building. • In October, at the suggestion of the Railway Commissioners, Footscray City Council and the Commonwealth Motor Bus Company Ltd initiated a discussion regarding a bus service between Yarraville and Melbourne. It was anticipated that the bus service would provide a cheaper and more comfortable alternative to the overcrowded trains during rush hours. The proposed bus route was to begin at the corner of Anderson and Fehon Streets and terminate in the Melbourne CBD, going through Footscray.¹⁷
1927	A double-storey, brick Signal Box was constructed on the south of the upside platform. ¹⁸
1935	Two brick shops were constructed c.1935-6 on the western side of the station and were subsequently assigned nos. 27-29 Birmingham Street. The shops were used as hairdressing salon and confectionary store until 1974. ¹⁹

¹⁶ PROV, VPRS 8600/P1, Unit 135

¹⁷ "Motor buses for Footscray and Yarraville" in Independent (Footscray), 21 October 1922, p 4.

¹⁸ Heritage Victoria. Statement of Significance for Interlocking Railway Crossing Gates (H1028).

¹⁹ Sands and McDougall Directories

Year	Development
1946-50	The Yarraville Station Bus Interchange (referred to as Bus Terminal in Council records) was constructed between 1946 and 1949. ²⁰ In August 1949, Footscray City Council discussed the installation of an electric clock at the interchange building. ²¹
1969-2000s	<ul style="list-style-type: none"> • Use of the Goods Sidings ceased in 1969. The yard was converted into a carpark around the late 1990s and early 2000s. • In 1994, the Interlocking Railway Crossing Gates (VHR H1028) were included in the VHR. • The Signal Box was decommissioned in c.1995. • The Stationmaster's Residence was sold by the Victorian Railways and subsequently became a private residence. The southern section of the property was excised in 1998 and became the site of a separate housing development.²² • The pedestrian underpass was infilled in c 1990s to early 2000s.

²⁰ The building is not captured by the 1945 aerial photo, indicating it was built after this date.

²¹ PROV, VPRS 5338/P0, Unit 36, City of Footscray Council Minute Book 1949, p 317.

²² Plan of subdivision PS 417430A

ATTACHMENT 3

HERITAGE COUNCIL COMMITTEE REQUEST FOR INFORMATION ('RFI') AND EXECUTIVE DIRECTOR RESPONSE

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Event Number: **RHC20236**

To: Steven Avery, Executive Director of Heritage Victoria (via email)
CC: Owner and Submitter (via email)

22 March 2023

Dear Mr Avery,

EXECUTIVE DIRECTOR'S RECOMMENDATION - YARRAVILLE RAILWAY STATION COMPLEX (PROV H2447)

On 15 January 2024, the Executive Director made a number of recommendations to the Heritage Council under Part 3 of the *Heritage Act 2017* ('the Act') in his report for the above place ("Report") (**Attachment 1**).

In the Report, the Executive Director recommended, in summary, that the Heritage Council determine that:

- *Recommendation* the Yarraville Railway Station Complex (*excluding Stationmaster's residence*) located at 15 Goulburn Street, Yarraville ('the Place') is of State-level cultural heritage significance and should be included in the Victorian Heritage Register (VHR) in the category of Registered Place in accordance with section 49(1)(a) of the Act ("*Recommendation 1*"); and
- the former Stationmaster's Residence is not of State-level cultural heritage significance and should not be included in the VHR in accordance with section 49(1)(b) of the Act; the recommendation and any submissions be referred to the relevant planning authority for consideration for an amendment to the planning scheme ("*Recommendation 2*"); and
- the Interlocking Railway Crossing Gates (VHR H1028) be removed from the VHR as this registered place will be incorporated into the proposed registration of the Yarraville Railway Station Complex ("*Recommendation 3*").

On 19 January 2024 the Executive Director's Report was published in accordance with section 41 of the Act.

Following publication of the Report, (1) submission was received. That submission did not request a hearing (**Attachment 2**).

At a meeting of the Heritage Council on 2 February 2023, the Heritage Council determined, pursuant to section 15(3) of the Act, to delegate the determination to a Heritage Council Regulatory Committee ('the Committee').

The Heritage Council appointed the Committee, consisting of David Helms (Chair), Michael McMahon and Dr Mark Burgess to consider this matter.

It is now for the Committee to consider the Recommendations and the submission received and make a determination pursuant to section 49 of the Act.

For that purpose, section 47(1) of the Act empowers the Committee (as a delegate of the Council) to request the Executive Director to provide any information in relation to a recommendation made under section 37 of the Act.

While the Committee finds adequate information in the Executive Director's recommendation concerning the station complex, it seeks additional information regarding the decision to exclude the former Stationmaster's Residence from the extent of registration.

The 'Rationale for the Extent of Registration' mentions that 'the former Stationmaster's Residence is assessed to have not met the VHR threshold', but the 'Assessment of the State level Cultural Heritage Significance of the Place' (starting on page 17 of the report) makes no mention of the residence. This approach appears to be inconsistent with the proposal to include other features including the shops, signal box, and the bus interchange within the proposed extent of registration.

In accordance with section 47(1) of the Act, the Committee hereby requests that you kindly provide the following information:

1. Details of your consideration of the following matters (if any), and whether or not those matters were regarded as important in the formulation of Recommendation 2:
 - a. Until 1886 it was the practice of the Victorian Railways to provide accommodation for the stationmaster within the station building itself. From 1886 detached stationmaster's residences became policy and this example, built in 1887, would appear to be among the first examples demonstrating this change.
 - b. The historical evidence on pages 8 and 9 of the Report that the former Stationmaster's residence was built on part of the original Victorian Railways land surrounding the station and was part of the major upgrade works carried out in 1886-1887.
 - c. The analysis which deemed the other parts of the complex as 'elements of significance'.
2. If the matters set out in paragraph (1) above were not considered in detail in the Report, what additional steps would be required to explore the relevance/importance of these matters in assessing the cultural heritage significance of the Place?
3. On page 16 of the Report, where it says:

"The former Stationmaster's Residence is assessed to have not met the VHR threshold and is thus recommended to be excluded from the proposed registration. Please refer to the section below and the comparative analysis section for more details."

The Committee questions whether this exclusion decision was applied prior to applying the tests set out in the Threshold Guidelines. As a contributory part of the Yarraville Station complex the Committee seeks information as to the rationale to evaluate the significance of the former Stationmaster's Residence in isolation and whether the same exclusion tests were applied to the other features proposed for inclusion in the extent of registration including the shops, signal box and bus terminal.

4. On page 17 of the Report, in response to the test for Step 1 in Criterion A, it provides that:

"The Yarraville Railway Station Complex is a comprehensive and highly intact complex that demonstrates a clear association with Victoria's rail and bus networks in the nineteenth and twentieth centuries. Physical structures including the Bus Interchange, gates, Signal Box, station buildings and shops are evidence of the place's close association with this aspect of Victoria's history."

In response to the test for Step 2 in Criterion A, the Report provides that:

"The place allows the association with phase 'Linking Victorians by rail, tram and bus' to be better understood than most other similar railway station complexes."

Although a great many places and objects in the State are associated with the phase, the Yarraville Railway Station Complex demonstrates the development to the place from a minor station to a major passenger hub and freight centre of the Statement of Recommendation from the Executive Director, Heritage Victoria Yarraville Railway Station Complex metropolitan network, as featured by, amongst other things, the purpose-built station buildings, remnant of the Goods Siding,

Shops, Signal Box and the set of Interlocking Railway Crossing Gates servicing both freight and passenger lines.”

As a ‘comprehensive and highly intact complex that demonstrates a clear association with Victoria’s rail and bus networks in the nineteenth and twentieth centuries’ the Committee believes the former Stationmaster’s Residence would also demonstrate this association. Why are the shops, for example, considered to be more important as evidence of this association?

5. On page 28 of the Report, in the comparative analysis for the former Stationmaster’s Residence, it provides that:

“The VHR contains few examples of housing provided for stationmasters or railway workers that were detached from railway stations.”

The word ‘few’ suggests there are other examples of detached residences on the VHR. If so, are they comparable? If not, and there are none, would this example be important as a rare representative example?

6. The comparative analysis on page 29 of the Report includes three examples. While they were used as stationmaster’s residences, none appear to be directly comparable, as the Beaconsfield example was not built by the Victorian Railways, and the other examples are different designs that were built later. Why are these considered to be good comparisons for the Yarraville residence and why weren’t more directly comparable examples considered such as the former stationmaster’s residence at 2 Mackey Street, Longwarry (HO288 in the Baw Baw Planning Scheme)?

Date for response

Could you please provide us with response to the above questions via email to katerina.axiarlis@delwp.vic.gov.au and heritage.council@delwp.vic.gov.au by **COB Thursday 16 May 2024**.

If you require any further assistance, contact the Heritage Council Secretariat at heritage.council@delwp.vic.gov.au or (03) 8508 1656.

Please note that this correspondence and any response will be circulated to submitters and interested parties for transparency.

Yours sincerely



Katerina Axiarlis
Hearings Manager, Heritage Council Secretariat

Attachments: 1. Executive Director’s recommendation - Yarraville Railway Station Complex (Prov H2447)
2. Submissions received pursuant to section 44 of the Act.

Ref: RHC20236

Katerina Axiarlis
Hearings Manager
Heritage Council Victoria
katerina.axiarlis@delwp.vic.gov.au and heritage.council@delwp.vic.gov.au

Dear Katerina

RESPONSE TO REQUEST FOR FURTHER INFORMATION – YARRAVILLE RAILWAY STATION COMPLEX (PROV H2447)

Thank you for your letter of 22 March 2024. The Executive Director's (ED) response to the Committee's enquiries about the Yarraville Station Complex, with a focus on the Stationmaster's Residence (the residence), are as follows.

1. Details of your consideration of the following matters (if any), and whether or not those matters were regarded as important in the formulation of Recommendation 2:

- a) **Until 1886 it was the practice of the Victorian Railways to provide accommodation for the stationmaster within the station building itself. From 1886 detached stationmaster's residences became policy and this example, built in 1887, would appear to be among the first examples demonstrating this change.**

In reply, the ED advises that consideration was not given to this matter. The ED was unaware at the time of the recommendation that '... from 1886 detached stationmaster's residences became policy'. The ED is also unclear as to where this policy was expressed.

The ED does note that there is discussion in the [Report from the Select Committee upon the conduct of the Railway Commissioners](#) (1882) in relation to the provision of accommodation for stationmasters on the railway line to Frankston and whether this should be within the railway station building (see for example question 152). The Hon Thomas Bent, Commissioner of Railways, in evidence to the Select Committee on 1st June 1882 stated that

"It is my policy not to have the station-master living in the station house in case of fever or anything of that sort. I am supported in that by Mr. Greene, the engineer of existing lines." [question 1071 – page 46]

Architectural and railway historian Andrew Ward in his publication *A Story of Stations: the architecture of Victoria's railways in the Nineteenth Century* refers to Camperdown railway station of 1883 and states that:

"[Thomas] Bent's influence, however, is clear in the separation of the station master's quarters from the main station [at Camperdown], his controversial stand taken with the designs for the Frankston line apparently having been accepted for all future works". (page 219).

On that basis, the ED does accept that Yarraville is likely to be among the early examples of a detached stationmaster's residence.

In accepting that the stationmaster's house at Yarraville may be an early example of a detached stationmaster's house, the ED further submits that it would appear that other forms of accommodation were most likely being provided to railway employees by 1880. For example, plans showing cottage accommodation for gatekeepers at Geelong and Queenscliff (1879) and Karlsruhe and Daylesford (1880) exist. In establishing this, the ED has not undertaken extensive or exhaustive research.

b) The historical evidence on pages 8 and 9 of the Report that the former Stationmaster's residence was built on part of the original Victorian Railways land surrounding the station and was part of the major upgrade works carried out in 1886-1887.

In reply, the ED advises that initial consideration was given to the fact that the residence was originally built on Victorian Railways land surrounding the station. This was a reason that led the ED to nominate the land occupied by the residence to enable a site visit and further assessment of the property, to determine whether the residence was integral to the significance of the Yarraville Railway Complex.

c) The analysis which deemed the other parts of the complex as 'elements of significance'.

The 2023 assessment of the Yarraville Railway Complex was initially prompted by the Victorian Government's announcement in 2022 about the removal and/or closure of various level crossings between Footscray and Werribee, including that at Yarraville.

At that time, the [Interlocking Railway Crossing Gates \(VHR – H1028\)](#) were already included in the Victorian Heritage Register. In 1994, when the interlocking railway gates were registered, a full assessment of the Yarraville Railway Complex had been contemplated. However, this assessment did not eventuate due to the then Public Transport Corporation's urgent timetable for installing boom barriers at Yarraville.

In considering what elements might constitute a 'railway complex' at Yarraville for the purposes of an ED nomination (which would then lead to a further assessment), the obvious elements were:

- The former signal box which contained remnant mechanical equipment for the operation of the heritage registered interlocking railway crossing gates.
- The 1893 railway station building (upside platform) and 1916 timber shelter (downside platform).

Less obvious, but considered worthy of an ED nomination in order for a further assessment to occur, were:

- The two 1935-36 brick shops constructed on railway land, owned by VicTrack and within the immediate confines of the railway station.
- The adjacent 1946-48 bus interchange.

Initial investigations also led to the discovery that the house at 13 Murray Street, Yarraville had been built by the Victorian Railways on what was then railway land for the accommodation of the stationmaster. To the best of our knowledge, this historical link had not previously been identified in heritage studies by other authorities and bodies. This is perhaps not surprising given the modest and unassuming characteristics of the residence. The building does not self-identify as being a railway house.

All the above elements were then the subject of an ED nomination to enable a further heritage assessment to occur. It should be noted that the nomination was made prior to a more detailed site inspection of the various elements including the residence.

Following the ED nomination and the subsequent site visit, Heritage Victoria officers were of the view that the residence at 13 Murray Street was not a critical component of the place, unlike the other elements. This was based on considerations such as:

- 1) While the residence was built on the original Victorian Railway land surrounding the station, the creation of Birmingham Street in the late 1890s has visually excised the residence from the railway complex.
- 2) The original context as an isolated residence has been affected by the subsequent residential development of Murray Street (refer page 8 of the ED Recommendation).
- 3) The impact of points 1) and 2) above has obscured the historical context of the residence as the former stationmaster's residence within the railway land. Rather, the existing context of the residence is easily read as a Victorian private residence forming part of the Murray Street residential streetscape.
- 4) The integrity of the residence has been affected by changes in recent decades. These include:
 - The original M-shaped roof form has been altered.
 - The removal of a second chimney from the original house.
 - The addition of a large rear extension to accommodate a contemporary kitchen and living space.
 - Although the front portion of the house still retains something of its Victorian layout and configuration, there is little surviving original fabric that suggest that the building is anything other than a late Victorian private residence.
 - All of these changes make the residence in stark contrast to other identified elements, which retain their original site context and historical function as purposefully-built railway, bus and associated infrastructures. They are much clearer in demonstrating the history and significance of the complex at a state level. The description and history of all individual elements are outlined in Report pp. 2- 11.

Given the above, Heritage Victoria formed the view that the residence no longer possessed a sufficient degree of integrity to demonstrate a clear association with Victoria's rail and bus networks in the nineteenth and twentieth centuries at a State-level.

It was concluded that the residence should not constitute part of the proposed heritage place and that it should be excluded from further assessment (including, rightly or wrongly, the application of the criteria and threshold tests).

2. If the matters set out in paragraph (1) above were not considered in detail in the Report, what additional steps would be required to explore the relevance/ importance of these matters in assessing the cultural heritage significance of the Place?

The ED is of the view that to address question 2, a more fulsome comparative assessment might be required of existing railway complexes to identify whether there were surviving railway employee housing beyond the confines of the complex.

It is also considered that such an assessment would be potentially onerous because:

1. The exercise should not be limited to just stationmaster's houses but extend to other Victorian Railways provided housing. For example, accommodation was understood to also be provided in some cases to Assistant Stationmasters, Depot Superintendents, Gatekeepers and other railway employees.
2. Railway housing does not always self-identify (i.e. as with 13 Murray Street there may not be the visual clues of a railway connection). An examination of maps, plans and other historic documents may be necessary to establish an association.

3. On page 16 of the Report, where it says:

“The former stationmaster’s residence is assessed to have not met the VHR threshold and is thus recommended to be excluded from the proposed registration. Please refer to the section below and the comparative analysis section for more details.”

The committee questions whether this exclusion decision was applied prior to applying the tests set out in the threshold Guidelines. As a contributory part of the Yarraville Station complex the Committee seeks information as to the rationale to evaluate the significance of the former Stationmaster’s Residence in isolation and whether the same exclusion tests were applied to the other features proposed for inclusion in the extent of registration including the shops, signal box and bus terminal.

As discussed in response to Question 1, it was concluded following a site visit that the residence should not constitute part of the proposed heritage place and that it should be excluded from further assessment (including, rightly or wrongly, the application of the criteria and threshold tests), given the integrity and site context of the dwelling.

Heritage Victoria did not apply the same exclusion test to the other elements included in the proposed extent of registration. This is because:

- 1) These are elements that constitute the essential operational structures of a railway complex in their original site context, as demonstrated by other selected comparable VHR examples in the Report. These include upside and downside station buildings and shelters, male toilets and the signal box. In the case of the signal box, it still retains the capstan, cabling and other structure associating to the operation of the Interlocking Railway Crossing Gate within the building. On this basis, it is assessed to be a significant component of the ED recommendation for inclusion.

- 2) The two shops directly abut the upside platform, are located on railway land which is still owned by VicTrack. They retain a high degree of integrity to their construction date. They are in a position that connects the passengers transitioning between the Anderson Street crossing and the Booking Hall. This context allows their historical and current function as business premises serving commuters to be clearly legible.

This is similar to the situation at [Flinders Street Railway Station Complex \(VHR H1083\)](#) where Campbell Arcade is registered as part of the heritage place.

At Glenferrie Railway Station, several nearby shops on Glenferrie Road are also built on railway land and within the general confines of the station. These are also located within the extent of registration.

Finally, at Yarraville, the shops are in such proximity to the other railway elements that their inclusion would satisfy the tests for additional land under the *Heritage Act 2017*. In other words, the land occupied by the shops is important to the protection or conservation of the place, and contributes to an understanding of the place.

With regards to the bus terminal, the rationale for inclusion can be found in references in pages 17 to 24 in the ED Recommendation.

4. As a ‘comprehensive and highly intact complex that demonstrates a clear association with Victoria’s rail and bus networks in the nineteenth and twentieth centuries’ the Committee believes the former Stationmaster’s Residence would also demonstrate this association. Why are the shops, for example, considered to be more important as evidence of this association?

Please refer to Question 3 above for the rationale behind the inclusion of the shops.

5. On page 28 of the report, in the comparative analysis for the former Stationmaster’s Residence, it provides that:

“The VHR contains few examples of housing provided for stationmasters or railway workers that were detached from railway stations.”

The word ‘few’ suggests there are other examples of detached residences on the VHR. If so, are they comparable? If not, and these are none, would this example be important as a rare representative example?

As outlined in the history section of the Recommendation, Yarraville Railway Station Complex entered its first major development phase in the 1880s and 90s, making it one of the last railway station complexes that reflect the design principles of Richard Speight.

The ED would like to clarify that in this case no other 1880s freestanding stationmaster’s residences are thought to be included in the VHR, either as independent structures or as part of a railway complex.

The VHR comparators that were selected were done so because they are of similar historical period and scale to Yarraville.

Because comparable examples could not be found in the VHR, the search was broadened to examples of railway residences included in local planning schemes, and the examples at Beaconsfield, Branxholme and Wycheproof were therefore selected as additional comparators (see ED Recommendation pages 29-30).

By 1980, it is understood that there were over 2,200 staff residences or equivalent owned by the Victorian Railways. Approximately half of these were constructed after 1945, mostly being pre-fabricated houses imported from the UK as part of the 'Operation Snail' project (Victorian Railway Construction and Property Board annual report). This implies that roughly 1,100 staff residences were extant prior to the Second World War and many of them would potentially remain across Victoria.

6. The comparative analysis on page 29 of the Report includes three examples. While they were used as stationmaster's residences, none appear to be directly comparable, as the Beaconsfield example was not built by the Victorian Railways, and the other examples are different designs that were built later. Why are these considered to be good comparisons for the Yarraville residence and why weren't more directly comparable examples considered such as the former stationmaster's residence at 2 Mackey Street, Longwarry (HO 288 in the Baw Baw Planning Scheme)?

The ED would like to clarify the use of the term 'standard design' in both our presentation and subsequent response to the Heritage Council inquiry on 4 April 2024, as it appears that the term has created some confusion. Heritage Victoria did not intend to imply that the Victorian Railways did not implement uniform designs for railway staff accommodation. Rather, the term was used to demonstrate the fact that a purposefully built stationmaster's residence is indistinguishable from any other conventional private dwelling, unless it comprises a clear site context or setting, such as being directly connected to a station building or located within a legible railway complex. The examples at Beaconsfield, Branxholme and Wycheproof were selected to reiterate these points. The ED apologises for any confusion.

The list of comparators (like with most ED Recommendations) should not be considered exhaustive or comprehensive. It is always accepted that there may be other better comparative examples that exist beyond the knowledge of the ED.

For example, Heritage Victoria has most recently been alerted to the former stationmaster's residence at [12 Reef Street, Maldon](#) (HO 292, Mount Alexander Planning Scheme). This former railway dwelling was excluded from the registration of the [Maldon Railway Station Complex \(VHR H1573\)](#) when this place was amended in the VHR in 2000. While it was built later than the Yarraville residence, the Maldon example is located within a clearly legible railway complex and directly fronts the former turntable and other major railway elements. As such, the Maldon residence possesses a clear site context and interrelationship with other railway structures. It is potentially a better example than the Yarraville residence in contributing to an understanding of a Victorian Railway station complex.

In our opinion, the example at 2 Mackey Street, Longwarry, identified by the Committee, may also be a better example than Yarraville as a freestanding railway residence. The tender for the construction of the Longwarry residence was gazetted on 11 June 1886 (VicGov Gaz. 1886, no 68, p 1726), whereas Yarraville was gazetted on 11 February 1887 (Vic Gov Gaz 1887, no 12, p 440).

This makes Longwarry an even earlier, purposefully-built, freestanding stationmaster's residence. Based on the images available online, the Longwarry residence is comparable to the Yarraville residence in terms of design, plan and scale. The original roof form is still in place.

I trust this response is of assistance.

Yours sincerely



Geoffrey Austin
Manager, Heritage Register
Heritage Victoria

16/05/2024

(As delegate for Steven Avery, Executive Director, Heritage Victoria pursuant to the Instrument of Delegation)

ATTACHMENT 4

HERITAGE COUNCIL CRITERIA FOR ASSESSMENT OF PLACES AND OBJECTS OF CULTURAL HERITAGE SIGNIFICANCE

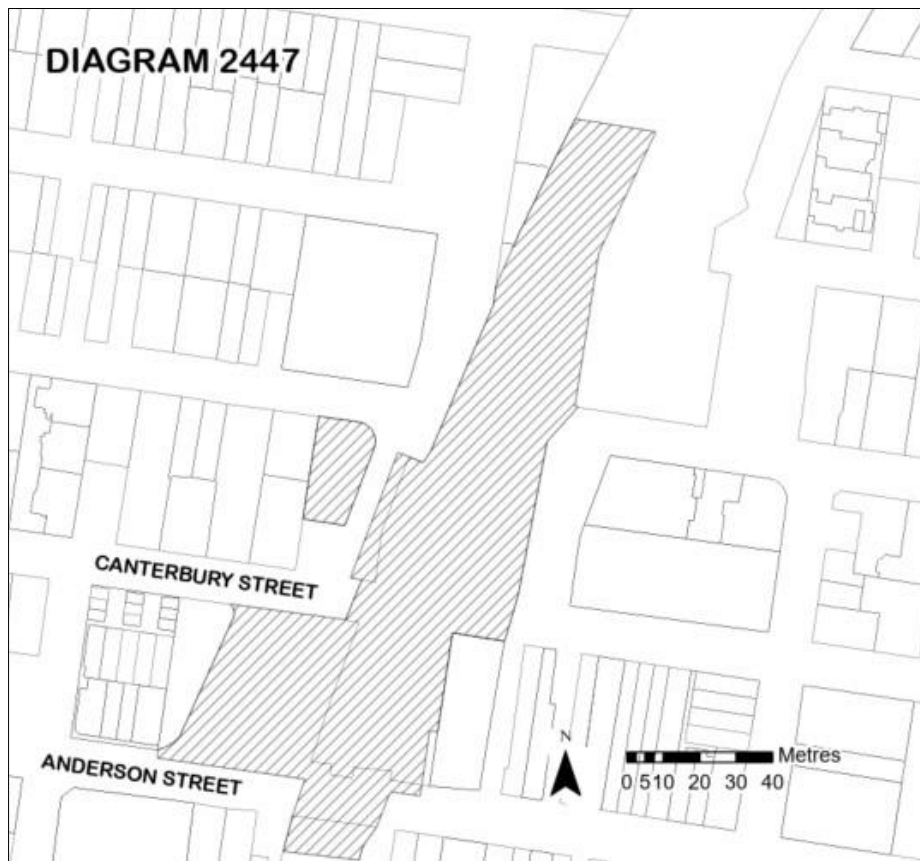
CRITERION A	Importance to the course, or pattern, of Victoria's cultural history.
CRITERION B	Possession of uncommon, rare or endangered aspects of Victoria's cultural history.
CRITERION C	Potential to yield information that will contribute to an understanding of Victoria's cultural history.
CRITERION D	Importance in demonstrating the principal characteristics of a class of cultural places and objects.
CRITERION E	Importance in exhibiting particular aesthetic characteristics.
CRITERION F	Importance in demonstrating a high degree of creative or technical achievement at a particular period.
CRITERION G	Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons.
CRITERION H	Special association with the life or works of a person, or group of persons, of importance in Victoria's history.

These were updated by the Heritage Council at its meeting on 1 December 2022, and replace the previous criteria adopted by the Heritage Council on 6 December 2012.

ATTACHMENT 5

EXTENT OF REGISTRATION

All of the place shown hatched on Diagram 2447 encompassing all of Lot 1 on Title Plan 957172, Lot 1 on Title Plan 957180, Lot 1 on Title Plan 957175, Lot 1 on Title Plan 957193, Lot 1 on Title Plan 939529, Lot 1 on Title Plan 939529, Lot 1 on Title Plan 410742, Lot 1 on Title Plan 957186, Lot 1 on Title Plan 604797, Lot 1 on Title Plan 605469, Lot 1 on Title Plan 381146; Lot 1 on Plan of Subdivision 417430 and part of Lot 1 on Title Plan 957178, part of Lot 1 on Title Plan 607916, part of Lot 1 on Title Plan 957507 extending from the building façade for the width of the footpath, part of Lot 1 on Title Plan 957194; and part of the Birmingham Street road reserve, and part of the Anderson Street road reserve being the width of the footpath.



ATTACHMENT 6

PERMIT EXEMPTIONS UNDER SECTION 38

PERMIT EXEMPTIONS

General exemptions

General exemptions apply to all places and objects included in the VHR. General exemptions have been designed to allow everyday activities, maintenance and changes to your property, which do not harm its cultural heritage significance, to proceed without the need to obtain approvals under the Act.

Specific exemptions may also apply to your registered place or object. If applicable, these are listed below. Specific exemptions are tailored to the conservation and management needs of an individual registered place or object and set out works and activities that are exempt from the requirements of a permit. Specific exemptions prevail if they conflict with general exemptions.

Find out more about heritage permit exemptions [here](#).

Specific Exemptions

Extensive Specific Permit Exemptions for the Yarraville Railway Station Complex are not required on the basis that there are General Exemptions in place for all places in the VHR that allow for day-to-day maintenance, and repairs.

It is recommended that the following are exempt from the requirement to obtain a permit:

1. All interior alterations and redecoration of the new rear portion of the residence including the living/dining, kitchen, laundry and rear bedroom.
2. All non-structural internal alterations to the front rooms of the residence comprising the hallway, lounge, front bedroom (east side), front bedroom (westside), second bedroom (westside) and bathroom.
3. All redecoration of the front rooms of the residence comprising the hallway, lounge, front bedroom (east side), front bedroom (westside), second bedroom (westside) and bathroom.
4. Conversion and installation of a bathroom within the second bedroom from the front on the west side of the residence.

end