

Heritage Council Regulatory Committee

Euroa Railway Goods Shed

1–11 Elliot Street, Euroa, Strathbogie Shire (Taungurung Country)

Hearing – 19 and 20 June 2024

Members – Margaret Baird (Chair), Dr Steve Campbell-Wright, Peter Mathieson

DETERMINATION OF THE HERITAGE COUNCIL

Not to include the place in the Victorian Heritage Register – After considering the Executive Director’s recommendation, all submissions received, and conducting a hearing into the matter, the Heritage Council has determined, pursuant to section 49(1)(b) of the *Heritage Act 2017* (Vic), that the Euroa Railway Goods Shed located at 1–11 Elliot Street, Euroa, Strathbogie Shire (Taungurung Country) is not of State-level cultural heritage significance and is not to be included in the Victorian Heritage Register.

Margaret Baird (Chair)
Dr Steve Campbell-Wright
Peter Mathieson

Decision Date – 12 September 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.

HEARING PARTICIPANTS

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

The Executive Director, Heritage Victoria ('the Executive Director') was represented by Ms Clare Chandler, Principal Heritage Assessments, and Mr Gareth Wilson, Heritage Officer (Assessments). Submissions and submissions in reply were received. Verbal submissions were also made at the hearing.

AUSTRALIAN RAIL TRACK CORPORATION (THE 'ARTC')

The Australian Rail Track Corporation ('the ARTC') was represented by Robert Forrester of Counsel. Mr Forrester was instructed by Ms Joanna Kenny, Senior Associate, Clayton UTZ. ARTC's submissions were supported by a statement of evidence by Ms Michelle Knehans, Senior Associate with Lovell Chen Pty Ltd, Architects and Heritage Consultants. ARTC called Ms Knehans to present her expert evidence and be cross-examined at the hearing. Submissions and evidence in reply were also received. Verbal submissions were also made at the hearing.

JOHN SIMPSON AM

John Simpson AM¹ was represented by Daniel Epstein of Counsel. Submissions opposing the Executive Director's recommendation were received from Mr Simpson. Mr Simpson's submissions were supported by a statement of evidence by Ms Deborah Kemp, heritage consultant. No submissions or evidence in reply were received. Verbal submissions were also made at the hearing.

SOUTHERN AURORA COMMITTEE, VIOLET TOWN ('SAC')

The Southern Aurora Committee ('SAC'), Violet Town was represented by Mr Bruce Cumming. SAC presented written submissions, which included community letters of support, and made verbal submissions at the hearing. No submissions in reply were received. Verbal submissions were made at the hearing.

¹ Although material was said to be submitted on behalf of 'Euroa Connect', at the hearing Mr Epstein confirmed at the Euroa Connect was unincorporated and therefore Mr Simpson was the appropriate party to the proceedings.

BACKGROUND

INTERIM PROTECTION ORDER REQUEST AND DETERMINATION

01. On 16 November 2023, the Heritage Council received a request that an Interim Protection Order ('IPO') be made in relation to the Euroa Railway Goods Shed, located at 1–11 Elliot Street Euroa, Strathbogie Shire (Taungurung Country) ('the Place'). After considering the request that an IPO be made, on 24 November 2023, the Heritage Council determined, pursuant to section 143 of the *Heritage Act 2017* (Vic) ('the Act'), to make and serve an IPO in relation to the Place. The IPO was extended on 20 May 2024 to prevent it from lapsing before this registration proceeding was determined.

RECOMMENDATION OF THE EXECUTIVE DIRECTOR

02. On 15 January 2024, the Executive Director made a recommendation ('the Recommendation') to the Heritage Council pursuant to Part 3, Division 3 of the Act that the Place is not of State-level cultural heritage significance and should not be included in the Victorian Heritage Register ('the Register').
03. After the Recommendation was received, notice of the Recommendation was published on 19 January 2024 for a period of 60 days in accordance with section 41 of the Act.
04. During the public advertisement of the Recommendation, four submissions were received pursuant to section 44 of the Act from:
 - ARTC which supported the Recommendation
 - Mr Simpson who objected to the Recommendation and requested a hearing
 - SAC which objected to the Recommendation and requested a hearing
 - Strathbogie Shire Council ('Strathbogie Council') which neither objected nor supported the Recommendation and did not attend the hearing, but provided information for the Committee's consideration.²

THE HEARING

05. Pursuant to section 46 of the Act, a hearing was scheduled and a Heritage Council Regulatory Committee ('the Committee') was duly constituted to consider the Recommendation and submissions received.
06. On 26 April 2024, all prospective hearing participants were advised that a registration hearing in relation to the Place had been scheduled for 19 and 20 June 2024.
07. Directions were given as to the conduct and timing of the pre-hearing steps.
08. Written submissions were invited, and further information was provided about the hearing.
09. Following a request from a hearing participant, an extension of time was granted for all participants to lodge hearing and response material.
10. All parties lodged hearing submissions, however written response submissions and evidence were only received on behalf of the ARTC and the Executive Director.
11. The hearing was conducted by way of videoconference using the Microsoft Teams™ online platform ('the hearing').
12. Four parties participated in the hearing, with two calling expert evidence.

² Strathbogie Council submitted that, due to the 'Specific Controls Overlay – Schedule 18' which applies to the land, even if the Euroa Railway Goods Shed was subject to a Heritage Overlay, the planning permit requirement for demolition of the Euroa Railway Goods Shed would not apply. Instead, any permission to use or develop the land for a project would require a heritage impact assessment to the satisfaction of the Minister for Planning.

THE PLACE

13. The Place is described on pages 4 and 5 of the Recommendation as follows:

Setting and Context

The freestanding goods shed is located on the western side of the main rail corridor at Euroa, directly opposite the passenger platform and station building. The timber station building, constructed in 1878 but later modified, features a large, corrugated metal platform canopy supported by curved metal support brackets. A signal bay also projects onto the platform. A small van goods shed, clad in corrugated sheeting, sits directly to the south of the main passenger building.

All tracks servicing the former goods siding have been removed. An external goods platform, constructed from earth with timber and concrete retaining walls, extends northwards from the goods shed. The base of a former goods crane is set within a concrete pad on the platform.

Goods Shed

The shed is of a simple gable design, with a short overhanging eave on the western elevation to provide shelter for the vehicle loading platform. A distinctive roof lantern runs almost the entire length of the shed. A “through roadway” provides rail access to the internal platform along the eastern edge of the shed and is accessed via (modern replacement) swing doors at the northern and southern ends. The entire structure is clad in corrugated metal sheeting of various gauges and lengths.

The eastern elevation faces directly onto the rail corridor. It features a tuck-pointed dressed masonry wall at the base, consisting of several courses of granite capped in bluestone. The upper three-quarters of the elevation are clad in corrugated metal sheeting with no external openings, terminating in the main timber roof beam supporting a full-length gutter.

The western elevation sits on several courses of granite with little of the mortar still in place. A pair of sliding loading doors, also clad in corrugated metal, provide access to the internal loading platform for road vehicles. A projecting timber ledge is supported on a series of metal I-beams, possibly the remnants of what would have once been a wider vehicle loading platform. Strips of horizontal timber coping are located along the corrugated metal walling to protect the shed from vehicle impact. The overhanging eave is supported on a series of metal brackets, many of which double as downpipes servicing the gutter.

The north and south elevations both feature full height swing doors to access the internal roadway for use by rail traffic. These swing doors have replaced the original timber framed doors. Undecorated barge boarding lines the gable ends of both elevations. The north elevation features an access door leading directly from the goods platform, while on the southern elevation a second access door is reached via a set of simple timber steps. A gap in the corrugated sheeting in the southern gable end reveals the likely location of the circular vent (now removed).

Internally, the shed is dominated by the large loading platform. A layer of bitumen now covers what appears to be the original timber decking. Concrete stumps have replaced the original timber that once supported the platform structure. All rail track has been removed from the internal roadway (siding) The remains of a weighing platform is located in the southwest corner, close to the loading doors on the western elevation. Internal framing is in timber with prefabricated metal roof trusses.

Materiality

The upper section, including the roof, is entirely clad in corrugated metal sheeting. Much of the roof sheeting appears to be original, evidenced by both the gauge of the corrugations and the short length of the sheets, as well as the survival of the maker’s

branding in several places. This is especially true on the eave overhang where “Gospel Oak” branding is still clearly visible on the underside of the sheets. The longer corrugated sheets used to clad the walls are likely to be from a later date.

The entire structure sits on a masonry plinth consisting of granite and bluestone, possibly to protect the structure against collisions with rail cars. Despite the humble appearance of the shed as a whole, considerable effort has been given to achieving a decorative finish to the masonry supporting the eastern shed wall. Consisting of several courses of granite topped with a single row of bluestone, the dressed stone has also been tuck pointed. The remaining elevations sit on granite only, reminiscent of a drystone wall, with less attention given to achieving a decorative finish.

The entire upper part of the structure relies on internal timber framing, to which the corrugated metal sheeting is directly attached via screws. The internal goods platform is also entirely constructed of timber, though the deck is now covered by bitumen and concrete supports have replaced the original timber stumps. Also notable is the use of prefabricated, riveted iron roof trusses.

PRELIMINARY, PROCEDURAL AND OTHER MATTERS

SITE INSPECTION

14. On 16 July 2024, Committee Members Margaret Baird and Dr Steve Campbell-Wright undertook a site inspection of the Place, accompanied by the Heritage Council’s Secretariat Hearings Manager and Project Officer. Representatives from ARTC were in attendance to provide a safety briefing and access to the property. No submissions were sought, made or received at the time of the site inspection.

CONFLICTS OF INTEREST

15. The Chair invited Committee Members to consider whether written declarations or otherwise 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 interests and made no such declarations.

FUTURE USE, MAINTENANCE AND DEVELOPMENT OF THE PLACE

16. ARTC has advised that the subject land is owned by VicTrack. The North-Eastern Railway Line corridor, which includes the land upon which the Place stands, is leased by ARTC. As lessee of the rail corridor, ARTC advised it is responsible for the management and operation of the rail track and related assets and is the relevant party to these proceedings.
17. Due to submissions made during the course of the proceedings, the Committee has been made aware that the land is subject to Special Control Overlay Schedule 18, which provides for the proposed redevelopment of the subject site.
18. 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 section 49(1) of the Act, the role of the Committee is to determine whether the Place, or part of it, is of State-level cultural heritage significance and is, or is not, to be included in the Register.

ISSUES

19. The following section is not intended to be a complete record of submissions and evidence presented to the Committee. It is a summary of what the Committee considers to be the key issues, followed by an explanation of the Committee’s findings on each key issue.

20. Any reference to the Criteria or to a particular Criterion refers to the ‘*Victorian Heritage Register Criteria and Threshold Guidelines*’ (updated by the Heritage Council on 1 December 2022 [‘Criteria for Assessment’] (see **Attachment 1**).

SUMMARY OF POSITIONS

21. The Executive Director recommended that the Place does not meet any of the Criteria for Assessment and therefore is not of State-level cultural heritage significance and should not be included in the Register.
22. ARTC generally agreed with the position of the Executive Director. It submitted that the Place is not of State-level cultural heritage significance and should not be included in the Register.
23. Mr Simpson and the Southern Aurora Committee both submitted that the Place is of cultural heritage significance and satisfies the threshold for State-level significance under Criteria A, B, D and F. Ms Kemp’s written evidence did not expressly assess the Place against the Criteria, but the Criteria were discussed through the presentation of her evidence and cross-examination.
24. Other submissions relating to Criteria E, G and H were made throughout the hearing process. The Committee refers to these briefly in this determination.

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

Summary of submissions and evidence

25. In assessing the Place under Step 1 of Criterion A, the Executive Director considered that the Place illustrates the phases of ‘linking Victorians by rail’ and ‘farming’. The Executive Director recognised that Step 1 of the test is likely satisfied, because the Place played a key historical role in establishing the Euroa district, and supporting agricultural trade in the early years of settlement in the Goulburn Valley.
26. The Executive Director did not consider that Step 2 of the test could be met, as the Place does not allow the association with these phases to be better understood than most other similar places in the State. Further, it was submitted that other places in the Register, including railway complexes featuring railway goods sheds along the former North-Eastern Railway Line, enable the phase of rural development and agricultural trade to be better understood than a singular railway goods shed such as the Place. The Executive Director listed Seymour Railway Station (VHR H1591), Wangaratta Railway Station Complex (VHR H1597), and Chiltern Railway Station and Goods Shed (VHR H1609) as examples. While it was noted that railway goods sheds played a vital role in transporting rural commodities across the State, the Executive Director submitted that there are numerous places associated with the historical development and expansion of farming across Victoria which better demonstrate this association because of their direct connection to agricultural activity (for example mills, silos, and homesteads with outbuildings).
27. ARTC, relying on the evidence of Ms Knehans, agreed with the Executive Director that the Place does demonstrate an association with the establishment of the Victorian railway system in the nineteenth century (and the North-Eastern Railway Line in particular) satisfying Step 1, but submitted that the Place is one of several railway goods sheds across Victoria that demonstrate these historical themes. Ms Knehans referenced comparable examples of railway goods shed complexes which are subject to heritage protection which she opined better evidence the form and function of the railway stations on that line and more broadly.
28. Mr Simpson submitted that Criterion A may be relevant for several reasons, including that the Place:

- Served as a major distribution point ‘for the entire lands developing to its north and west facilitating the growth of many various industries and the success of selectors and farmers important to the State during the early 1870s.
 - Evidences innovative technologies associated with the development of North-Eastern Railway Line through its design and use as a ‘light weight timber framed building that was clad and roofed with corrugated iron’ and as ‘an intact example of prototype developed under the direction of Thomas Higinbotham’.
- 29.** In her evidence in support of Mr Simpson’s position, in addition to referencing the ‘cost effective lightweight’ materials as relevant to Criterion A, Ms Kemp stated that the Place was designed as a complete prefabricated building, which was packed and sent to its destination in parts. Ms Kemp suggested that roman numeral markers would likely be present on the building to demonstrate its prefabricated nature, but because of difficulties accessing and undertaking an internal inspection of the building, she was unable to sight these on her viewing of the Place.
- 30.** In verbal submissions at the hearing, Ms Kemp stated that Criterion A might also be relevant because of the Place’s association with the historical land selection process. She said that the Place and the broader railway corridor were integral to the land selection process demonstrating settlement of rural areas and the development of Australia’s agricultural industry in this part of Victoria. Ms Kemp conceded that there is little written evidence on this specific relationship, as it has not been thoroughly analysed in historical studies.
- 31.** Mr Cumming submitted that Criterion A might be satisfied because of the Place’s association with the 1969 Southern Aurora railway disaster based on eyewitness accounts that staff at the Euroa Railway Station had tried to prevent the accident. Mr Cumming also suggested that Criterion A might be relevant, because the Place was ‘the prime remaining representative example of the Type-2 shed’³ and the drive at the time for more economic railway construction.
- 32.** The Executive Director challenged submissions that the Place might be historically significant for its role in the immediate aftermath of the Southern Aurora railway disaster. The event occurred at Violet Town (not Euroa), and stories and memories of the crash victims have been appropriately memorialised at that location with the establishment of places such as the Southern Aurora Memorial Garden.
- 33.** Ms Knehans disagreed with Ms Kemp’s opinion that the Place is of historical significance as ‘an intact example of a prototype developed under the direction of Thomas Higinbotham’. Ms Knehans’ evidence was that this statement lacks supporting studies to prove that the Place served as a prototype for similar lightweight railway goods sheds. She considered that Ms Kemp’s statement overstates the individual contribution of this design, which she considered is better demonstrated by other existing infrastructure and buildings along the North-Eastern Railway Line which are already included in the Register.

Discussion and conclusion

- 34.** The Committee accepts the phases considered in the Executive Director’s Recommendation as those suitable to determine significance under Criterion A and finds that the phases are properly understood to relate to be (a) ‘linking Victorians by rail’ and (b) ‘farming’. The Committee however finds that the Place does not allow the association with either phase to be better understood than most of the places in Victoria with substantially the same associations.
- 35.** The Committee accepts the Executive Director’s and ARTC’s assessment that the Place does not enhance the understanding of these historical phases compared with other similar locations and finds the comparative examples with other registered

³ ‘Type 2’ as defined in ‘The Study of Historic Railway Buildings and Structures for V/Line’ prepared by Ward in 1988.

places on the former North-Eastern Railway Line provided by the Executive Director to be instructive. Consequently, the Committee recognises that there are other places across Victoria also associated with the historical development and expansion of farming which contain original fabric and provide an understanding of these themes, including registered homesteads and station complexes on the Western line.

36. The Committee finds submissions made by the Executive Director, in particular the contention that other types of buildings (such as silos and wool sheds) offer a clearer understanding of the period's significance to these themes as particularly persuasive. The Committee agrees with the Executive Director that there is no specific or identified feature or historical aspect which elevates the Place to a position where it demonstrates the historical phase better than other railway goods sheds, farm complexes, and other places connected to farming in Victoria. In this context, the Committee considers that a standalone railway goods shed such as the Place is one of many contributing elements which might provide an understanding of those themes.
37. The Committee considers that the basis for Ms Kemp's proposition that the Place amounted to a 'prototype' or 'innovative design for lightweight goods sheds' is not sufficiently supported by evidence. Moreover, the Committee considers that Ms Kemp's suggestion that the Place was 'prefabricated', 'flat packed' and 'constructed on site' does not appear to be supported by the evidence. Ms Kemp conceded in cross-examination that the references in her statement to specific evidence of prefabrication could not be properly attributed to the Ward study (1988), or to any other study.
38. Further, the Committee considers that there is a lack of substantial written evidence or thorough historical analysis supporting Ms Kemp's suggestion that Criterion A is relevant because of the Place's association with the land selection process.
39. The Committee considers there to be an insufficient link, supported through verifiable evidence, that the Place had a strong association with the 1969 Southern Aurora railway disaster which would merit State-level significance under Criterion A.
40. The Committee is not persuaded on the information, material and evidence before it that any party to the hearing established that the Place meets the State-level threshold for inclusion in the Register in relation to Criterion A.
41. The Committee considers that the Place does not allow for a better understanding of an association with 'linking Victorians by rail' and 'farming' than most other places in Victoria with substantially the same association. For these reasons, **Criterion A is not satisfied at the State-level.**

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

Summary of submissions and evidence

42. In assessing the Place under Step 1 of Criterion B (as it did with Criterion A), the Executive Director considered that the relevant phases for association were 'linking Victorians by rail' and 'farming'.
43. The Executive Director submitted sub tests B1 and B2 are met because:
 - The Place has clear association with significant historical phases in Victoria's cultural history, specifically 'linking Victorians by rail' and 'farming' (B1).
 - There is strong evidence of the association with these historical phases, with the Place demonstrating the development and expansion of Victoria's railway network, with the North-Eastern Railway Line between Melbourne and Wodonga playing a crucial role in trade and settlement, and because agriculture became one of the major economic drivers in the later part of the 1800s in the State (B2).

44. However, the Executive Director did not consider that the Place met test B3 and therefore considered that Criterion B is unlikely to be met at the State-level. The Executive Director submitted that there is no evidence that the Place is rare or possesses uncommon features, with many other railway goods sheds and numerous farm complexes with the same associations existing across the State, some of which form part of larger railway complexes.
45. ARTC, relying on the evidence of Ms Knehans, acknowledged the possibility that test B3 could be satisfied. However, ARTC asserted that the Place does not meet the State-level test outlined in SB1, SB2, or SB3 which requires the Place either be rare or uncommon, one of a small number of places that demonstrate the identified phases, containing unusual features which are not replicated elsewhere in Victoria, or endangered to the point of rarity.
46. In Ms Knehans' assessment, the State-level test is not met because:
- Railway goods sheds of various forms and materiality are not rare or uncommon in Victoria, nor are they underrepresented in the Register (SB1).
 - The Euroa Railway Goods Shed is not unusual in its arrangement or function, being one example of several Victorian railway goods sheds incorporating an internal platform designed to facilitate and support the transportation and movement of goods (SB2).
 - Railway goods sheds are common in Victoria, with numerous examples included in the Register both individually and as part of railway station complexes. There is no evidence of a widespread threat to this particular building type or evidence that railway goods sheds on the North-Eastern Railway Line are endangered to the point of rarity (SB3).
47. Further, Ms Knehans' opinion was that exclusion criteria XB1, XB2 and XB5 also applied, therefore excluding the Place from recognition under Criterion B:
- While rare as a generally intact example of the particular composite form (blue stone/granite footings and corrugated iron cladding), no evidence has been provided to suggest the 'type' put forward as rare, is of State-level significance. The materials, including corrugated iron, are typical of the period and building typology (XB1).
 - Ms Kemp's and other submitters' reliance on multiple qualifiers in the class identified, where the exclusion guideline identifies that generally, the identification of a class and one qualifier will be acceptable (XB2).
 - Uniqueness rather than rarity is claimed. Suggestions that an intact roof of Gospel Oak corrugated iron is rare in Victoria is not substantiated by the evidence which instead suggests that Gospel Oak corrugated iron was perhaps the most prominent in Australia at that time (XB5).
48. Ms Kemp's evidence on behalf of Mr Simpson (and Euroa Connect) was that the Place is a rare surviving example as the 'only intact representative example of the lightweight goods shed type as first designed by Thomas Higinbotham for the use on the North-Eastern light rail line'. While similar goods sheds at Violet Town, Longwood, and Wangaratta have been altered or lost, she considered that the Place remains intact and largely unchanged. Further, later railway goods sheds, built during the rail expansion under the Acts of 1880 and 1884 deviated significantly from the Place's 'original prototype' design in its architectural and civil engineering expression, making this Place rare. In addition, the Place's original materials, including Gospel Oak corrugated iron sheeting on the roof and walls, and intact nineteenth-century construction technologies, such as riveted connections, are now rare surviving features. It was for these reasons, Mr Simpson submitted that the Place merits State-level heritage protection under Criterion B.

49. In support of listing the Place under Criterion B, Mr Cumming submitted that the Place is the 'only remaining example of Higinbotham's shed classified by Andrew Ward as the second type, or Type-2 in the State of Victoria'. It was further submitted that the Ward study recommended the Type-2 Longwood shed to represent this class, but it was demolished, leaving only this example of the type now able to represent this type.

Discussion and conclusion

50. The Committee agrees with the Executive Director that Step 1 of the test could be satisfied, as the Place has a clear association with significant historical phases in Victoria's cultural history, specifically 'linking Victorians by rail' and 'farming' (see discussion in paragraphs 25–41 in response to Criterion A) and because the Place demonstrates the development and expansion of Victoria's railway network and the North-Eastern Railway Line's crucial role in trade, agriculture and settlement.
51. Although Step 1 is likely met, the Committee agrees with the Executive Director and ARTC that the Place does not meet the State-level threshold for significance under Criterion B.
52. Railway goods sheds of various forms and materiality are not rare or uncommon in Victoria, nor are they underrepresented in the Register. The Committee points to examples on the North-Eastern Railway Line which are already included in the Register, demonstrated through the Executive Director's submission and Ms Knehans' evidence (SB1).
53. The Committee does not consider that the Place is unusual in its arrangement or function, being one of a number of examples of Victorian railway goods sheds incorporating an internal platform designed to facilitate and support the transportation and movement of goods. Although the Committee acknowledges there are some interesting features of the Place (for instance, the use of Gospel Oak brand roofing, stone base, riveted trusses and external cast iron downpipes supporting the eave overhang), the Committee could not say that these features were noteworthy, and instead understands that some of the features were relatively commonplace for the time. For instance, the Committee notes that the sheet riveting method used cannot be considered a rare or defining feature of the Place and could instead be considered common and best practice at the time, likely implemented to prevent wind damage of the sheeting and theft (SB2).
54. Ms Kemp's evidence and Mr Cumming's submissions were made on the basis of the relevant class being a 'rare surviving example as the only intact representative example of the lightweight goods shed type as first designed by Thomas Higinbotham for the use on the North-Eastern light rail line' or a 'goods shed classified by Andrew Ward as a Type-2 shed', respectively. The Committee respectfully does not agree. The Committee relies on the definition of 'class' in the Criteria for Assessment. It identifies 'class' as generally referring to a sub-category of a broad place type, which is readily discernible as a broad place type and should not be narrowed by multiple qualifiers.⁴ In light of this clear definition in the Criteria for Assessment, the Committee agrees with the Executive Director and ARTC that the class types relied on in Ms Kemp's evidence and submissions by Mr Cumming are too narrowly defined to fairly assess and determine the cultural heritage significance of the Place at the State-level, or to usefully analyse the Place in comparison with other similar places across Victoria. The Committee finds exclusion criterion XB2 is particularly relevant in this regard.
55. The Committee accepts that the Place may have some unique elements and not match other places listed in the Register, Heritage Overlays, or within the State more broadly. However, the Committee acknowledges that places and objects assessed for significance at the State-level often do not have exact comparators within their class.

⁴ See definition of class on page 6 of the Criteria for Assessment.

56. The Committee accepts the Executive Director's comparative analysis of the Place and considers it sufficient to assess the cultural heritage significance of the Place against the Criteria for Assessment. It does not accept submissions to the contrary that were offered at the hearing.
57. The Committee reiterates its view in Criterion A above, that railway goods sheds are common in Victoria, and there are examples already in the Register both individually and as part of greater railway station complexes. The Committee has not been provided with evidence of widespread threat to railway goods sheds. Although understanding that works are proposed on the North-Eastern Railway Line, there is no evidence that railway goods sheds generally or on the North-Eastern Railway Line are endangered to the point of rarity (SB3).
58. The Committee is not persuaded, on the material and evidence before it that the Place meets the State-level threshold for inclusion in the Register in relation to any of the Criteria in the class of 'railway goods shed'. Therefore, the Committee accepts the analysis of the Executive Director and ARTC that **Criterion B is not satisfied at the State-level.**

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

Summary of submissions and evidence

59. The Executive Director's assessment found that, while the Place meets the Step 1 test for Criterion D, it does not satisfy the Step 2 State-level test, which requires it be a notable example of the class in Victoria.
60. The Executive Director considered that railway goods sheds have a clear association with Victorian railways, the establishment of which had an influence on the economic and social development of the State. The Executive Director further considered that the Place expresses the main characteristics typical of a railway goods shed that serviced the rail network at the time. However, the Executive Director did not view the Place as a notable example of the class 'railway goods shed'. It was said to lack the decorative interest, refined engineering and building standards, and design innovation found in other railway goods sheds throughout Victoria.
61. ARTC agreed with the Executive Director that the Place meets the Step 1 test for Criterion D, but not the Step 2 test. ARTC pointed to other examples of railway goods sheds already included in the Register that demonstrate the development and use of the railway network in Victoria in the nineteenth century for the transportation of goods and produce. These examples take a variety of forms and have differing materiality, including both early examples and those that incorporate particular design features. Unlike these examples, ARTC submitted that the Place is a simple utilitarian structure, resulting in a shed that lacks the design and detail evident at other railway goods sheds in Victoria. In ARTC's view, the Place is not an early example of a railway goods shed influential in design or form. In this way, it is not a notable example of its type.
62. Ms Kemp's evidence was that the Place 'is of representative significance as the only surviving intact representative example of the lightweight railway goods shed that was developed as a prototype under the direction of Thomas Higinbotham Engineer-in-Chief for use on the North-Eastern rail line'. She opined that, as a prototype, it demonstrates the primary features associated with its design and construction. She considered that these key features include the form and design of the building, lightweight timber framing and corrugated iron wall and roof cladding, wrought and cast metal roof trusses, the lantern to the roof ridge line which provides evidence of glazed sashes, timber louvres at each end and the mechanism that opened these louvres, evidence of the original circular vent, evidence of the former chimney, masonry base walls and the internal timber platform facing a single running line. She considered that construction details (which include the riveted trusses and riveted iron

sheeting and the extent of the original Gospel Oak corrugated roofing iron) contribute to the integrity and intactness of the Place.

63. Mr Cumming submitted that the Place represents well this type of building, which was introduced first on the North-Eastern Railway Line as a way of speeding construction and saving on costs. In addition to noting that the Place is intact and has good integrity, he considered the composite nature of the design is of interest and mentioned the stone block, timber frame, wrought-iron riveted trusses, the highest quality Gospel Oak corrugated iron cladding and the design details, including good ventilation and lighting.

Discussion and conclusion

64. The Committee agrees with the parties that the Place meets the Step 1 test for Criterion D. The Place is associated with a phase of historical importance, that is, 'the development of the Victorian railway and the transportation of goods and produce'. It is a representative example of a railway goods shed dating from the 1870s.
65. The Committee does not consider, based on all the material and evidence before it, that the State-level test (Step 2) for Criterion D is met.
66. The Committee notes that the State-level test for Criterion D requires that a building be more than merely representative, but rather that it is 'notable', being fine, influential or pivotal building of its class. The Committee acknowledges that the Place is an early example of a lightweight railway structure but does not consider it to be a notable example of the class of 'railway good sheds'.
67. The Committee acknowledges evidence suggesting that the Place is an early example of a shift towards a more economical approach to rail infrastructure. However, it considers that the subdued form, design and materiality are a direct reflection of its practical function rather than perceived ingenuity. The Committee agrees with the Executive Director's assessment that the Place lacks the decorative interest, refined engineering and construction standards, and design innovation characteristic of many other railway goods sheds across Victoria.
68. While the extensive use of corrugated sheet metal as wall cladding at the Place is recognised as an early example by the Committee, the railway goods shed at the Wangaratta Railway Station Complex (VHR H1597) similarly displays many of these design elements, despite subsequent modifications. The Committee also notes examples provided by the Executive Director of railway goods sheds with brick variants which are said to originate from the same period of construction, both on the North-Eastern Railway Line and in other locations.⁵ Unlike the Place, the pronounced decorative detailing, refined use of bluestone in construction, intactness and subsequent influence on later designs distinguish those railway goods sheds as exemplary representations of their class.
69. The Committee considers that the design features of the Place are not unique and are shared by other railway goods sheds in the State. The Committee accepts arguments that many of the lightweight design features characteristic of the Place are also evident in other railway goods sheds from this period. Although constructed of brick rather than corrugated sheet metal over a timber frame, railway goods sheds such as those at Chiltern Railway Station and Goods Shed (VHR H1603) on the North-Eastern Railway Line and Dunolly Railway Station (VHR H1670) share the same combination of metal trusses supporting a corrugated sheet metal roof, as seen at the Place.
70. Given the above matters, the Committee concludes that the Place does not satisfy the Step 2 test under Criterion D, as it is not a notable example of its class.

⁵ For example, Little River Railway Station and Goods Yard (VHR H1572) and Kyneton Railway Station Complex (VHR H1602).

71. The Committee accepts the analysis of the Executive Director and ARTC and, based on the information before it, finds that **Criterion D is not satisfied at the State-level.**

CRITERION F – IMPORTANCE IN DEMONSTRATING A HIGH DEGREE OF CREATIVE OR TECHNICAL ACHIEVEMENT AT A PARTICULAR PERIOD

Summary of submissions and evidence

72. The Executive Director's Recommendation found that the Place met the Step 1 test for Criterion F but did not satisfy the Step 2 State-level test (SF1). This conclusion was based on the assessment that, although the Place is an early example of using prefabricated elements and lightweight corrugated metal, it does not represent an exceptional or innovative example of this construction method. By the 1870s, the use of corrugated iron and prefabricated elements was already well-established in Victoria.
73. ARTC, supported by Ms Knehans' evidence, agreed that the Place meets the Step 1 test for Criterion F, as it is a well-preserved structure demonstrating creative or technical achievement through its materials and construction. However, ARTC submitted that it does not satisfy the Step 2 State-level test for Criterion F. While the use of corrugated iron cladding was common in mid-nineteenth century utilitarian buildings, it does not show extraordinary or innovative use in this instance. Similarly, the iron trusses, despite claims of rarity and educational value, do not appear to represent a technological breakthrough for that period. Ms Knehans stated that there is no evidence indicating that the fabrication or construction techniques used in the Place were exceptional or innovative for its time in Victoria.
74. Mr Simpson, relying on the evidence of Ms Kemp, argued that the Place is significant for its technical creativity. It was submitted that, while the technologies used in its design and construction were developed and available in Victoria, Thomas Higinbotham made a notable advancement by integrating earlier British prefabricated models with a timber frame. Further, this combination resulted in an innovative Australian prefabricated model that proved highly successful and subsequently served as a template for future rail projects in Victoria.
75. Mr Cumming submitted that the Place might meet State-level significance under Criterion F because its construction and the other Type-2 sheds was an innovative technical move towards rapid and cheap assembly of a permanent building in 1872–1873. The prepared components were able to be sent on train wagons along the newly built line and the building erected on site. Construction could be done reasonably quickly with minimally skilled labour, and the design has stood the test of time.

Discussion and conclusion

76. The Committee agrees with all parties that the Step 1 test for Criterion F is met, as the Place is relatively well preserved, although it has been demonstrated through Ms Knehans' evidence to have been altered, and includes some creative or technical achievement through its materials and construction.
77. However, the Committee determines that the Step 2 test for Criterion F is not satisfied. For Criterion F to be satisfied at the State-level, the achievement must be of a high degree, surpassing the ordinary standards of its time, and recognised as a significant breakthrough in design, fabrication, or construction techniques. The Committee concludes that, although the Place is an early example of using prefabricated elements and lightweight corrugated metal, it does not represent an exceptional or innovative example of this construction method.
78. The Committee accepts the analysis of the Executive Director and is satisfied, based on the information before it, that **Criterion D is not satisfied at the State-level.**

CRITERION G – STRONG OR SPECIAL ASSOCIATION WITH A PARTICULAR PRESENT-DAY COMMUNITY OR CULTURAL GROUP FOR SOCIAL, CULTURAL OR SPIRITUAL REASONS

Summary of submissions and evidence

79. The Executive Director's Recommendation found that the Place met the Step 1 test for Criterion G relating to the existence of a community or cultural group and evidence of an attachment of this group to the Place, but did not satisfy the Step 2 test, requiring the existence of a time depth to that attachment. In the Executive Director's view, while there is evidence of an interested community group and strong attachment to the Place, there is no evidence of this attachment over a long period nor broadly to the Victorian community.
80. Ms Knehans' evidence and ARTC concurred with the Executive Director's assessment. That is, while there is evidence of community interest in historical landmarks and buildings in the local area and of a strong attachment to this particular Place through the present campaign (satisfying G1(i) and (ii) of Step 1), there is no evidence of a time depth to that attachment. Ms Knehans concluded that there is no evidence that the relevant interest resonates across the broader Victorian community as part of a story that contributes to Victoria's identity and that therefore Criterion G could not be met at a State-level.
81. Mr Cumming, while not specifically addressing this criterion, in his section 44 submission submitted that 'the community has always had a strong connection to this building, the oldest public building in the region and is aware of its historical and heritage values.'

Discussion and conclusion

82. The Committee is persuaded by the arguments of ARTC, the evidence of Ms Knehans and the Executive Director's submissions that there is insufficient evidence of a sustained or long-term attachment to the Place, and the local and possibly regional interest fails to resonate across the broader Victorian community as contributing to Victoria's identity.
83. Therefore, the Committee accepts the analysis of the Executive Director and ARTC and is satisfied, based on the information before it, that **Criterion G is not satisfied at the State-level.**

CRITERION H – SPECIAL ASSOCIATION WITH THE LIFE OR WORKS OF A PERSON, OR GROUP OF PERSONS, OF IMPORTANCE IN VICTORIA'S HISTORY

Summary of submissions and evidence

84. None of the submissions explicitly addressed Criterion H. However, Mr Simpson referenced the design of the Place as being directly connected to the work of Thomas Higinbotham, then Engineer-in-Chief of the Victorian Railways, which could be relevant to Criterion H.
85. The Executive Director responded saying that there is no evidence of a direct association between the design of the Place and Thomas Higinbotham, beyond his role as Engineer-in-Chief. It was stated that while it is likely Higinbotham would have overseen the design of many structures on the North-Eastern Railway Line and influenced the economical approach to the project, it is unlikely that he had a close or ongoing involvement with the development of the Place. Nor is there any firm evidence that Higinbotham took a particular interest in the Place over other structures on the North-Eastern Railway Line.

Discussion and conclusion

86. The Committee concurs with the Executive Director's position and finds that there is no specific evidence linking the design of the Place directly to Thomas Higinbotham, aside from his general oversight as Engineer-in-Chief, to meet Criterion H.
87. The Committee accepts the analysis of the Executive Director and considers, based on the information before it, that **Criterion H is not satisfied at the State-level.**

CONCLUSION

88. The Committee thanks the parties for the extent of material compiled and presented to assist the Committee in its consideration of this matter. It appreciates the community interest that has been expressed through the detailed material presented by Mr Simpson and Mr Cumming.
89. After considering the Executive Director's recommendation, all submissions received, and conducting a hearing into the matter, the Heritage Council has determined, pursuant to section 49(1)(b) of the *Heritage Act 2017* (Vic), that the Euroa Railway Goods Shed located at 1–11 Elliot Street, Euroa, Strathbogie Shire (Taungurung Country) is not of State-level cultural heritage significance and is not to be included in the Victorian Heritage Register.

ATTACHMENT 1

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 3 December 2020.