

# Commonwealth Artificial Limb Factory (former)

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**Panel Amendment C305, City of Melbourne**

Proposed inclusion of 242-246 Sturt Street, Southbank  
in the Schedule to the Heritage Overlay

## **Statement of heritage evidence**

**Prepared by Peter Lovell**

Instructed by  
**Mills Oakley**

2 July 2020

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Prepared by

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Prepared for

LOVELL CHEN



Powdervale Pty Ltd

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## **Statement of Instructions, Qualifications and Experience and Declaration**

### *Authorship of this report*

This statement has been prepared by Mr Peter Haynes Lovell, Director of Lovell Chen Pty Ltd, Architects and Heritage Consultants, Level 5, 176 Wellington Parade, East Melbourne, assisted by Ms Candice Keeling, Heritage Consultant, also of Lovell Chen.

The views expressed in the statement are those of Mr Peter Lovell.

### *Qualifications and experience*

I have a Bachelor of Building degree from Melbourne University and have been director of the above practice, which I established with Richard Allom in 1981. Over the past 39 years I have worked in the field of building conservation and have been involved in, and responsible for, a wide range of conservation related projects. These projects include the preparation of conservation/heritage studies for the Borough of Queenscliffe, the former City of South Melbourne, the former City of Fitzroy and the former City of Port Melbourne. In addition, I have acted as heritage advisor to the Borough of Queenscliffe and the former City of South Melbourne. In the area of conservation management planning I have been responsible for the preparation of a wide range of conservation analyses and plans including those for the Melbourne Town Hall and Administration Building, the State Library and Museum, the Supreme Court of Victoria, Werribee Park, the Regent Theatre, the Bendigo Post Office, Flinders Street Station, the Old Melbourne Observatory and the Mt Buffalo Chalet. I have been responsible for the preparation of strategic planning reports for Government House, Canberra, the Melbourne Town Hall and the Supreme Court of Victoria.

In the area of building conservation works I have been involved in and directly responsible for the investigation, design and documentation of a wide range of projects including the ANZ Gothic Bank at 380 Collins Street, the Collingwood, Melbourne and Fitzroy Town Halls, the Athenaeum and Regent Theatres, Parliament House, Melbourne, Government Houses in Canberra and Perth, and the Supreme Court of Victoria Court of Appeal.

I am a member of long standing of the National Trust of Australia (Victoria) and Australia ICOMOS (International Council on Monuments and Sites). I am also an honorary fellow of the Royal Australian Institute of Architects.

Over the past twenty years I have appeared frequently before the former Historic Buildings Council, now the Victorian Heritage Council, the Victorian Civil and Administrative Tribunal and Planning Panels Victoria in relation to the listing of, and works to heritage places.

### *Instructions*

Verbal instructions were received from Ms Hannah Wilson of Mills Oakley on behalf of the owners Powdervale Pty Ltd.

### *Lovell Chen involvement*

My involvement in this project began in October 2018 when Lovell Chen was commissioned to undertake an assessment of the potential heritage significance of the property at 242 – 246 Sturt Street, Southbank. Preliminary heritage advice was provided to Ms Hannah Wilson in memorandum format in February 2019. The conclusion of the heritage advice was that the former artificial limb factory at 242-246 Sturt Street is of some interest historically to the City of Melbourne but does not meet the criteria for local heritage significance for either historical or social reasons.

*Declaration*

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

A handwritten signature in black ink, appearing to read 'Peter Lovell', is positioned above the printed name.

Peter Lovell

## 1.0 Introduction

This statement of evidence has been prepared for Powdervale Pty Ltd, owner of the property located at 242-246 Sturt Street, Southbank, and relates to Amendment C305 to the Melbourne Planning Scheme.

The subject property is located on the south-west corner of Sturt and Miles streets (Figure 1). The site comprises a one and two storey “L-shaped” building which forms the street edges on Miles and Sturt streets to the north and east; a double height building located along the west boundary and in the centre of the site is a workshop area covered by a sawtooth roof.

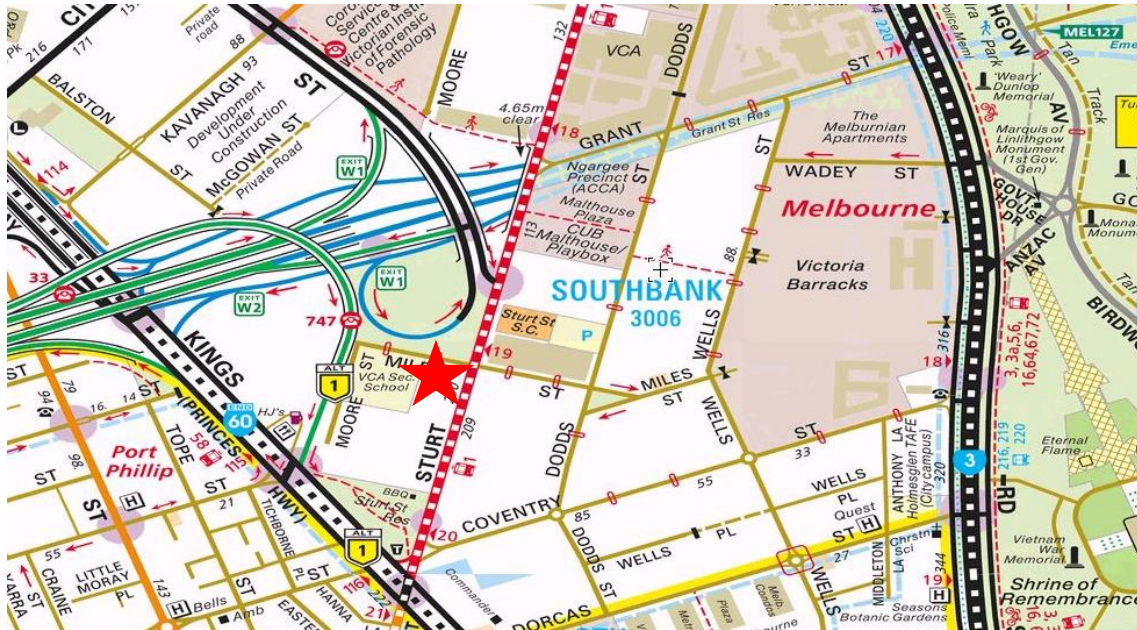


Figure 1 Plan showing approximate location of the subject property  
Source: [www.street-directory.com.au](http://www.street-directory.com.au)

## 2.0 Amendment C304 and C305

Amendment C304 to the Melbourne Planning Scheme implemented the findings of the *Southbank and Fishermans Bend Heritage Review* by applying the Heritage Overlay to one precinct, two group listings and six individual places in the Southbank area, on an interim basis. In October 2018 interim heritage controls were placed on the property at 242 – 246 Sturt Street, Southbank as part of Amendment C304. The interim controls expire on the 22 January 2021.

Permanent heritage controls are proposed as part of Amendment C305. Amendment C305 to the Melbourne Planning Scheme seeks to introduce a listing for an individual place to the Schedule to the Heritage Overlay and amend the Planning Scheme Map 08HO.

In the exhibited documentation, the subject property is to be identified as H01230 in the Schedule to the Heritage Overlay. The exhibited Schedule includes recommendations for external paint controls, but no internal alterations controls, or tree controls. It does not identify any outbuilding or fences as being exempt. The exhibited extent of the proposed heritage overlay is indicated at Figure 2.

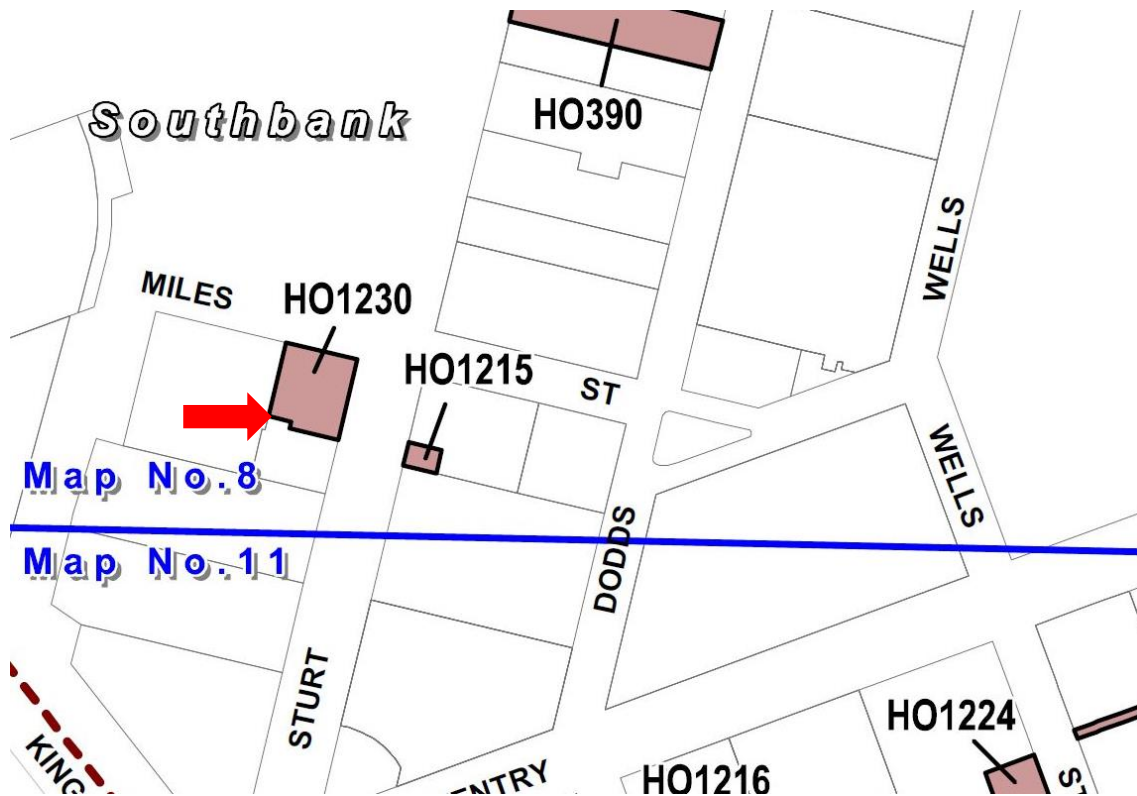


Figure 2 [part] Exhibited Heritage Overlay Map 002hoMaps08, with subject site indicated  
Source: Planning Panels Amendments [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) accessed on 6 March 2020

## 2.1 Southbank and Fishermans Bend Heritage Study

The subject property was included in the *Southbank and Fishermans Bend Heritage Review* (June 2017) undertaken by Biosis. The study was commissioned by the City of Melbourne to identify places of heritage significance, prepare a thematic history and make recommendations for the inclusion of places under the heritage overlay. The study recommended the retention of 17 existing heritage overlays, deletion of 14 existing individual heritage overlays, deletion of one precinct, the introduction of two new precincts and 35 new heritage overlays. Citations and statements of significance were prepared for all individual places and the two precincts. The study also identified a further 28 places for potential future heritage overlay.

The citation for the former Commonwealth Artificial Limb Factory, located at 242-246 Sturt Street, Southbank, identifies the property as being individually significant and recommends its inclusion in the Heritage Overlay on a permanent basis. This assessment is addressed in detail below.

## 2.2 Heritage citation

The exhibited amendment documentation includes a heritage citation for 242-246 Sturt Street, Southbank prepared for the City of Melbourne. The statement of significance for the site included in the citation is reproduced below:

*What is significant?*

The Commonwealth Artificial Limb Factory at 242-246 Sturt Street Southbank

Contributory elements include:

- parapeted two-storey form, with pitched roof behind;

- articulated brick facades
- steel framed windows

*How is it significant?*

The Commonwealth Artificial Limb Factory is significant historically and socially to Southbank and the City of Melbourne.

*Why is it significant?*

The Commonwealth Artificial Limb Factory is of social and historical significance for its role in providing essential services to returned servicemen from World War II. As an adjunct to the rehabilitation services of the Department of Defence (as also expressed in the nearby Repatriation Clinic), it also reflects the important and extensive services provided in the South Melbourne area following World War I, and expanding its following during and following World War II. These confirmed the area around the Shrine and the Victoria Barracks as the public centre for defence activities in Melbourne at these times. (Criteria A & G)<sup>1</sup>

### 2.3 Property grading

The property currently does not have a grading. The exhibited heritage citation report identifies 242-246 Sturt Street, Southbank as being individually significant at a local level and proposes a C grading in a level 3 streetscape.

In Clause 22.05 Heritage Places Outside the Capital City Zone of the Melbourne Planning Scheme defines grade C3 as follows:

‘C’ Buildings

‘C’ buildings. Demonstrate the historical or social development of the local area and /or make an important aesthetic or scientific contribution. These buildings comprise a variety of styles and building types. Architecturally they are substantially intact, but where altered, it is reversible. In some instances, buildings of high individual historic, scientific or social significance may have a greater degree of alteration.<sup>2</sup>

Level 3 Streetscapes

Level 3 streetscapes may contain significant buildings, but they will be from diverse periods or styles, and of low individual significance or integrity.<sup>3</sup>

### 2.4 Amendment C258

Amendment C258 to the Melbourne Planning Scheme was placed on exhibition in December 2017 and was the subject of a panel hearing in August 2018. This amendment seeks to implement the

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<sup>1</sup> Melbourne Planning Scheme Amendment C305, Southbank Fishermans Bend Heritage Review, prepared for the City of Melbourne 23 June 2017 by Biosis, Appendix 3, pp 528-529. [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) – accessed on 6 March 2020.

<sup>2</sup> Melbourne Planning Scheme, Clause 22.05 Heritage Places Outside the Capital City Zone, p 5 – <https://www.planning.vic.gov.au/schemes-and-amendments/browse-planning-scheme/planning-scheme?f.Scheme%7CplanningSchemeName=Melbourne> accessed on 6 March 2020.

<sup>3</sup> Melbourne Planning Scheme, Clause 22.05 Heritage Places Outside the Capital City Zone, p 5 – <https://www.planning.vic.gov.au/schemes-and-amendments/browse-planning-scheme/planning-scheme?f.Scheme%7CplanningSchemeName=Melbourne> accessed on 6 March 2020.

recommendations of the *Heritage Policies Review 2016* and the *West Melbourne Heritage Review 2016*. Of relevance to the subject site, the amendment replaces the existing alphabetic grading system which identified a building grading (A to D) and streetscape grading (1 to 3) with gradings of significant, contributory and non-contributory. This amendment has recently been approved by the Minister for Planning and is waiting to be gazetted.

In the *Southbank Heritage Inventory 26 April 2018*, as exhibited under Amendment C305, the property at 242-246 Sturt Street is identified as individually significant heritage place. Significant heritage places are defined in Clause 22.05, as exhibited under Amendment C258 as follows:

**‘Significant’ heritage place:**

A ‘significant’ heritage place is individually important at state or local level, and a heritage place in its own right. It is of historic, aesthetic, scientific, social or spiritual significance to the municipality. A ‘significant’ heritage place may be highly valued by the community; is typically externally intact; and/or has notable features associated with the place type, use, period, method of construction, siting or setting. When located in a heritage precinct a ‘significant’ heritage place can make an important contribution to the precinct.<sup>4</sup>

The methodology of the *Southbank and Fishermans Bend Heritage Review* notes that C buildings are generally converted to significant gradings.<sup>5</sup>

## **2.5 Previous heritage studies**

There have been various historical studies and reviews of the area in which the subject site is located. These include:

- South Bank Architectural and Historical Study (Graeme Butler, 1982)
- South Melbourne Urban Conservation Study (Allom Lovell, 1987)
- Amendment C19, Melbourne Planning Scheme, Panel Report, May 2001

The two studies and the panel report do not include the subject site.

## **3.0 History**

The citation within the Biosis report provides the following history:

The first proposal for a government-run factory for producing artificial limbs for returned soldiers came from a Mr J. Smith of Ringwood in 1915. In the later years of World War I, the needs of returning servicemen were met by the Caulfield Military Hospital, which employed 24 men (all but four having lost a limb themselves) in the manufacture of artificial limbs for wounded servicemen. An American expert, Mr C. A. Auger, was brought to Australia by the Commonwealth to assist in establishing a factory. Manufacture of limbs began at Caulfield in November 1917, and was transferred to a new factory in Sturt Street behind the Victoria Barracks in March 1918, initially under the control of the Defence Department, but transferred to the Repatriation Department by December 1920.

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<sup>4</sup> Melbourne Planning Scheme, Clause 22.05 as exhibited as part of Amendment C258 of the Melbourne Planning Scheme, p.7, <https://www.planning.vic.gov.au/schemes-and-amendments/browse-planning-scheme/planning-scheme?f.Scheme%7CplanningSchemeName=Melbourne> accessed on 6 March 2020.

<sup>5</sup> Melbourne Planning Scheme Amendment C305, Southbank Fishermans Bend Heritage Review, prepared for the City of Melbourne 23 June 2017 by Biosis, p.24. . [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) – accessed on 6 March 2020.



Five Commonwealth Artificial Limb Factories were established by 1919, employing 40 men, most of whom were also amputees.

Major Charles Morley was appointed assistant manager in 1918, and by August 1919 the South Melbourne factory was turning out 80 limbs a month. There were, however, complaints about the distance that men had to walk on crutches from the tram for fittings and repairs. Meanwhile Melbourne also had to serve Tasmanians who had to make the journey to Victoria to be fitted. The tramline was eventually extended down Sturt Street and a shelter constructed near the factory at the request of the Returned Servicemen's Amputees Association.

Alterations and additions to the factory were undertaken in 1940, and further additions done in 1978.<sup>6</sup>

The development of the site has been further investigated, including a review of drawings held by the National Archives. Based on these drawings, combined with reference to street directories, Mahlstedt fire insurance plans and aerial photographs, the sequence of development presents as follows:

- 1915 - Sands and McDougal Street Directories identify the allotment as being occupied by Benjamin Potter a farrier,
- 1916/7 - the Defence Department purchased part of the block bound by Sturt, Miles and Moore streets,
- c. 1918 – a building at the corner of Sturt and Miles streets was constructed to house the artificial limbs factory,
- 1919 – a ‘timber drying shed’ was constructed on the southern part of the site,
- 1923 – the site was transferred from the Department of Defence to the Repatriation Commission,
- 1936 – a new store was built between the timber drying shed and the artificial limb factory at corner of Sturt and Miles streets,
- 1944 - additional land was transferred to the Repatriation Commission from Defence Department,
- 1945/6 – the c. 1918 building at the corner of Sturt and Miles streets was demolished to make way for new single storey development (Figure 3 and Figure 4),
- 1951-1954 – a second floor addition was constructed at the corner of Sturt and Miles streets,
- 1970 -1978 the second-floor addition was extended southwards (Figure 5),
- 1970-2009 – the timber drying shed and building to the west of the shed were demolished and a new building constructed, and
- 1978 new building constructed on the southern portion of the allotment, (unclear if property was subdivided at this time).
- 1978 – a new store and patient treatment facilities constructed<sup>7</sup>
- 1994 – the South Melbourne Repatriation Artificial Limb and Appliance Centre (RALAC) was closed

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<sup>6</sup> Melbourne Planning Scheme Amendment C305, Southbank Fishermans Bend Heritage Review, prepared for the City of Melbourne 23 June 2017 by Biosis, Appendix 3, page 528. [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) - sourced 7 June 2019.

<sup>7</sup> Repatriation Commission, Annual Report, 1977-78, p.42.

- 1995 the site was sold in May<sup>8</sup>

Figure 6 to Figure 13 depict the historical development of the allotment from the 1920s to 2009. Where possible north is to the top of the image.



Figure 3 Elevation of proposed new Victorian factory, c.1945  
Source: National Library of Australia – Petherick Reading Room  
<https://www.postwarproject.com/post-war-project/category/prosthetic> sourced 13 November 2018

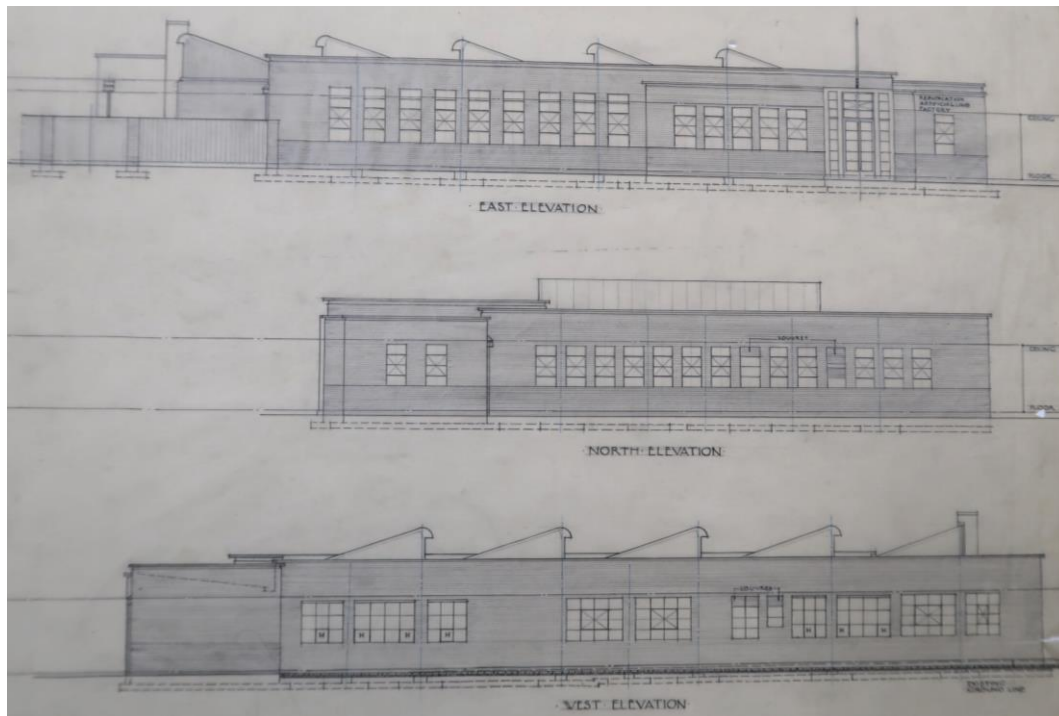


Figure 4 Drawing of Elevations and Sections Repatriation artificial limb factory Sturt & Miles Sts South Melbourne, dated 9.1.45  
Source: National Archive of Australia B3712/0 [AA2] D177 F1

<sup>8</sup> Repatriation Commission and the Dept of Veterans' Affairs, Annual Report, 1994-1995, p. 13



Figure 5      Photograph of the Artificial Limb Factory c. 1979  
Source: National Archives of Australia, series no. B6295, control symbol 6277C

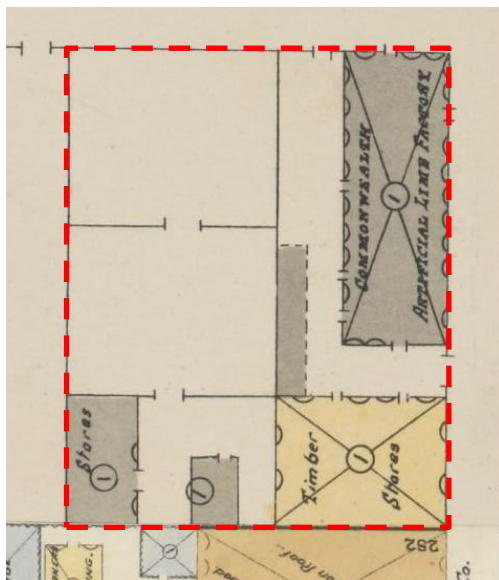


Figure 6      Detail of Mahlstedt fire insurance plan, South Melbourne, Version 2, plan no. 9, c.1920s plan of site, extent of subject site indicated in red  
Source: State Library Victoria,

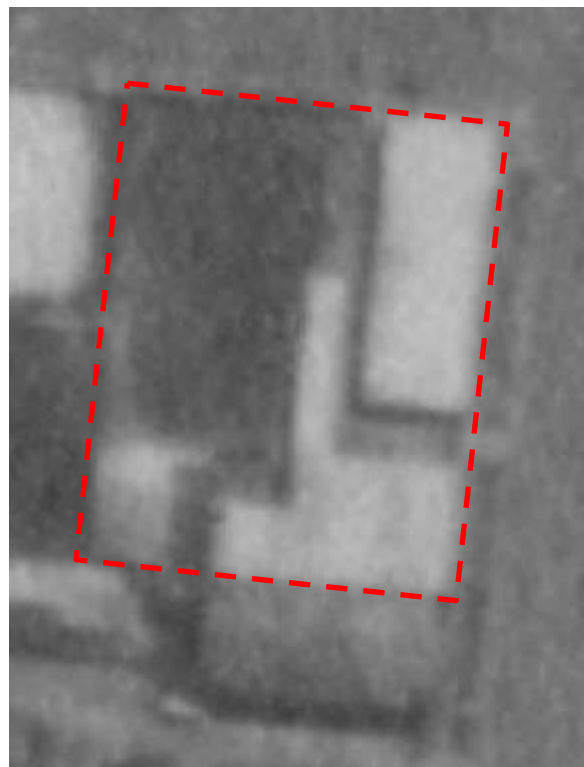


Figure 7      1931 Aerial, extent of subject site indicated in red  
Source: Land Data



Figure 8 1945 aerial – new building under construction, extent of subject site indicated in red  
Source: Land Data

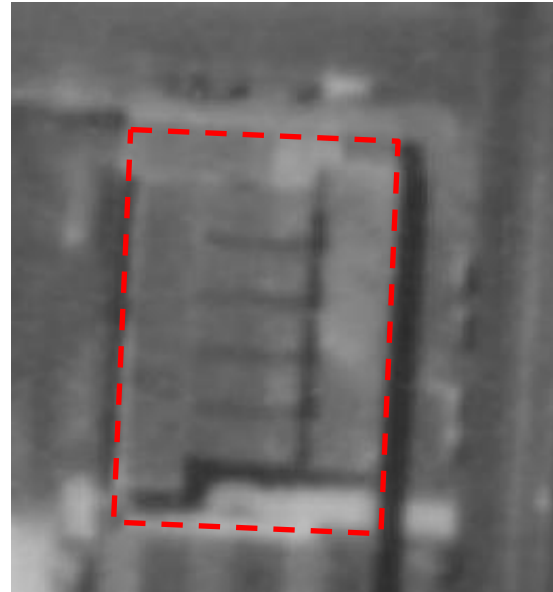


Figure 9 1951 aerial, extent of subject site indicated in red, prior to construction of first floor  
Source: Land Data

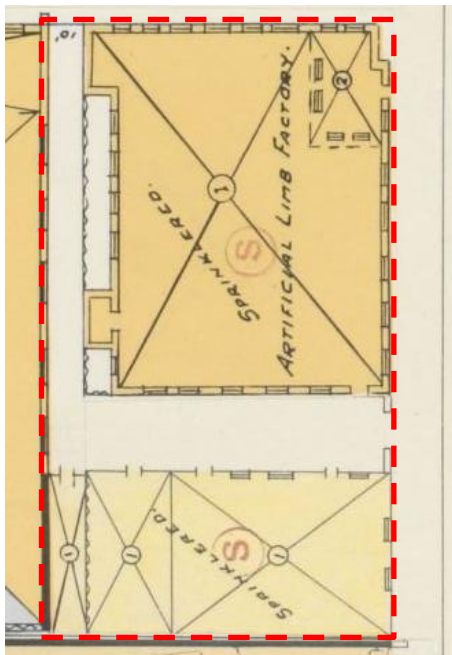


Figure 10 Detail of Mahlstedt fire insurance plan, South Melbourne, plan no. 9, 1950-1954, extent of subject site indicated in red, first floor addition indicated  
Source: State Library Victoria,

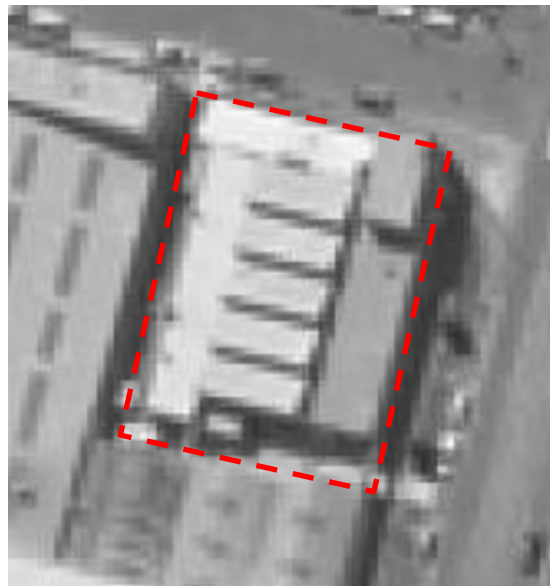


Figure 11 1963 aerial, extent of subject site indicated in red  
Source: Land Data



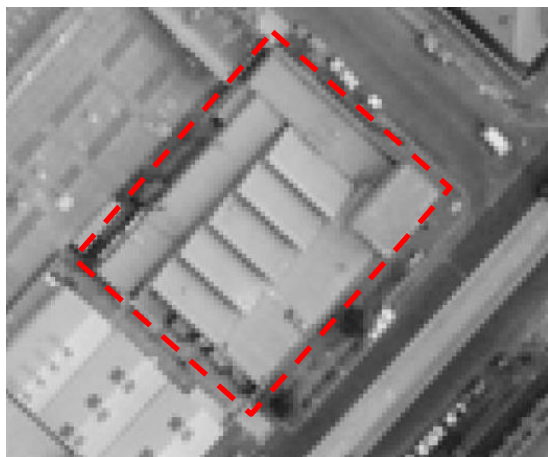


Figure 12 1970 aerial, extent of subject site indicated in red, prior to extension of first floor (by 1978) and building to west of site  
Source: Land Data

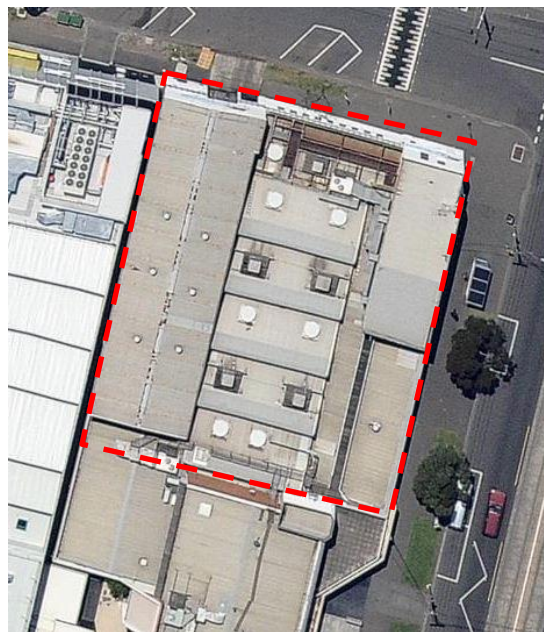


Figure 13 October 2009 aerial, extent of subject site indicated in red  
Source Nearmap 2009

#### 4.0 Description

The citation provided in the Biosis report provides the following description of the subject site:

The existing building is a one- and two-storey brick building with sawtooth roof. Elements of the original can still be discerned, including the ground floor fenestration and the sawtooth roof space behind. The corner section appears to have been built around the earlier walls to provide stairs to the upper-level office space, while a large vehicle entrance has been cut through the single-storey section to the south. The original entrance is still in place, although modified.<sup>9</sup>

The site comprises a one and two storey “L-shaped” building which forms the street edges on Miles and Sturt streets to the north and east; a double height building is located along the west boundary and in the centre of the site, a workshop area covered by a sawtooth roof.

The L-shaped building formed part of the 1945/6 phase of construction, with the additional storey over the north-east corner added by 1954 and extended by 1978 (Figure 14). The face brick walls, window sills, coping and entrance detail off Sturt Street have been overpainted in the corporate colours of the current tenant. This has resulted in the concealment of the original contrasting brickwork with rendered trims and detailing. The brickwork to the ground floor is articulated at the underside of the window sills where a darker brick formed the base of the building (Figure 5). The majority of windows to the ground floor of the L-shaped building are original steel framed pivot windows. The original Repatriation Artificial Limb Factory signage on the east façade has been removed (Figure 5). The corner building has parapet walls with a flat roof.

<sup>9</sup> Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 528 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) - sourced 7 June 2019.

The southern single storey section on the Sturt Street frontage has been modified to accommodate a large entrance in the façade (Figure 14). While on the north, a sheet metal clad screen has been introduced to increase the height of the façade giving the appearance of a two-storey building (Figure 15 and Figure 16). The corporate paint scheme and signage has been extended to the cladding.

The two-storey building on the west boundary consists of two parts, brick walls to the lower section and metal cladding to the first floor. The addition to the first floor was completed by 1954 and extended by 1978.

Towards the centre of the site is the workshop which has a sawtooth roof. The 1945/6 sawtooth roof has highlight windows to the south which provide light into the open space / workshop area below.

The building was subdivided and the southern portion of the site, the former 1919 timber drying sheds, no longer forms part of the allotment.



Figure 14 East elevation, second storey addition to north-east corner (right), single storey workshop with new opening indicated (left)





Figure 15 The north elevation with second storey addition to north-east corner (left), cladding/signage above parapet wall of single storey (centre) and the 1954/1978 double storey workshop area (right)



Figure 16 The roof area showing the west wall of the upper level addition and the screen cladding to the north wall

## 5.0 Assessment of heritage issues

The property at 242-246 Sturt Street, Southbank, was identified in the draft citation as part of Amendment C305 as a significant heritage place with a C3 grading. The citation concludes that the property is of local historical and social significance (Criteria A & G) and that the relevant thematic context, as related to the City of Melbourne, *Thematic History, A History of Melbourne's Urban Environment*, 2012, is '4.8 Defending the city' and '11.3 Caring for the sick'.

Criteria A and G are defined as follows:

Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance).<sup>10</sup>

Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance).<sup>11</sup>

In meeting these criteria the citation relies on the following key attributes or qualities of the place:

- Its role in providing services to servicemen returning from World War II,
- Its connection to the nearby rehabilitation services of the Department of Defence (as well as the Repatriation Clinic),
- Its contribution in evidencing defence activities centred around South Melbourne following World War I and as expanded during and following World War II, and
- How these confirmed the area around the Shrine and the Victoria Barracks as the public centre for defence activities in Melbourne at these times.

The citation further identifies the following elements of the building as being contributory:

- Parapeted two-storey form with pitched roof behind
- Articulated brick facades
- Steel framed windows

### 5.1 Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance)

#### 5.1.1 The Defence context

Following the establishment of Victoria Barracks on St Kilda Road in the mid-nineteenth century, by the end of World War I, there were a small number of associated Defence facilities in this part of South Melbourne.

The Mahlstedt fire insurance plan of the 1920s shows Defence related properties in the two blocks between Sturt and Moore streets, either side of Miles Street (Figure 17). This includes the block bound by Sturt, Grant, Moore and Miles streets, identified as the Commonwealth Defence Remount Department, on which a drill hall and caretaker's cottage was located, near the c.1918 Artificial Limb Factory. A Commonwealth Defence Department Clothing Factory, established in 1912, was also located in the block bound by Wells, Miles, Dodds and Coventry streets. This factory, since demolished,

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<sup>10</sup> Applying the Heritage Overlay, Planning Practice Note 1, August 2018, p. 1. Available at: [https://www.planning.vic.gov.au/\\_data/assets/pdf\\_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf](https://www.planning.vic.gov.au/_data/assets/pdf_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf). Source 7 March 2020.

<sup>11</sup> Applying the Heritage Overlay, Planning Practice Note 1, August 2018, p. 2. Available at: [https://www.planning.vic.gov.au/\\_data/assets/pdf\\_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf](https://www.planning.vic.gov.au/_data/assets/pdf_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf). Source 7 March 2020.



manufactured and supplied uniforms for the Defence and Postmaster General departments.<sup>12</sup> Additionally, in the blocks between Sturt and Dodds streets, there were also a number of light industrial businesses in the area, including a cardboard box factory, motor repair garage, bedding manufacturers, timbers stores and iron works.<sup>13</sup>

The *Sands & McDougall* directories also give an indication of there being a number of Defence related places in proximity to the long-established Victoria Barracks. In 1930 these included:

- Coventry Street: Commonwealth Government Garage, Ordnance workshop; Drill Hall, Orderly Rooms.
- Miles Street: Commonwealth Government Clothing Factory
- Sturt Street: Drill Hall, Remount Stables, Commonwealth artificial limb factory
- St Kilda Road: Repatriation Office, corner Coventry Street.<sup>14</sup>

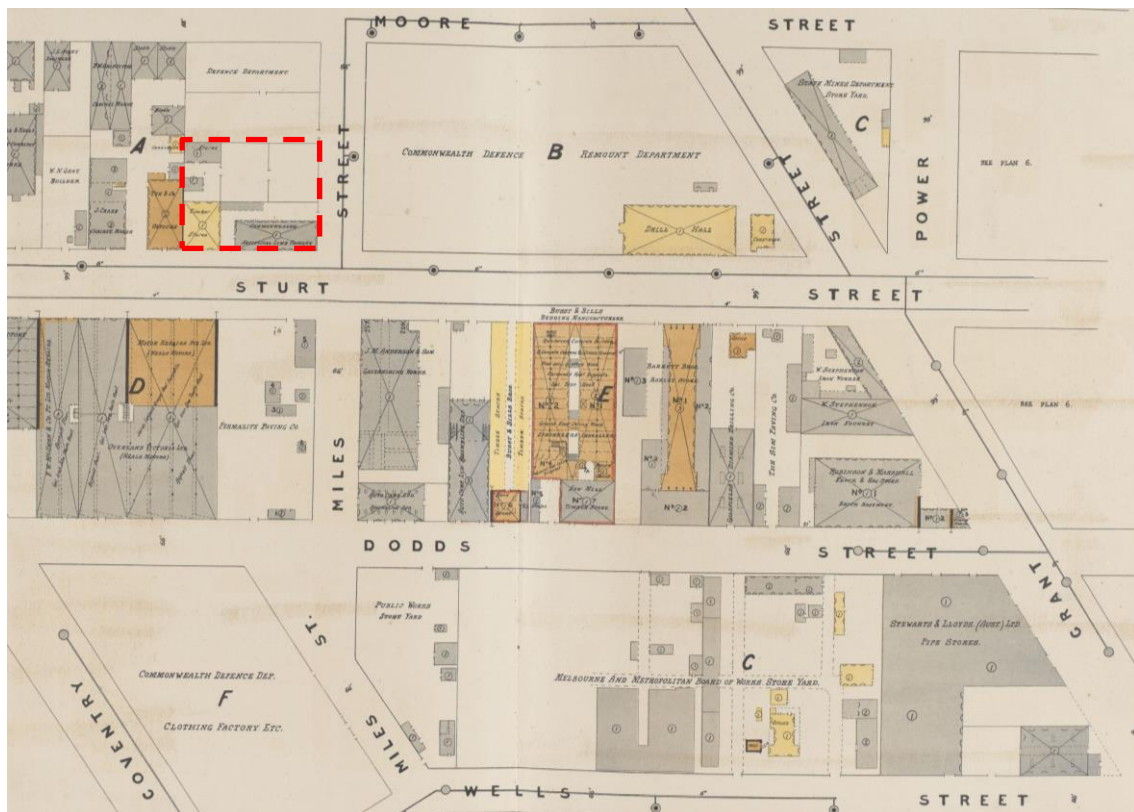


Figure 17 Detail of Mahlstedt fire insurance plan, South Melbourne, plan no. 9, Version 1, c. 1920s, location of subject site indicated  
Source: State Library of Victoria

The directories also show that aside from Defence related facilities, there were other light industrial businesses in this part of South Melbourne, including motor engineers, machinery merchants, panel

<sup>12</sup> 'Commonwealth Clothing Factory', National Trust of Australia (Victoria), Place ID 65346, via Victorian Heritage Database, <https://vhd.heritagecouncil.vic.gov.au/places/65346>, accessed 7 April 2020.

<sup>13</sup> G. Mahlstedt & Son, Mahlstedt Fire Insurance Plan, South Melbourne, Version 1, Plan no. 9, c. 1920s, State Library of Victoria.

<sup>14</sup> *Sands & McDougall directory*, 1930, see City South section, pp. 50-55.

beaters, including on Dorcas Street and Wells Street.<sup>15</sup> By the late 1930s, the South Melbourne council made complaints about the condition of the Defence buildings in Sturt Street, describing them as 'unsightly'.<sup>16</sup> It is unclear to which buildings these complaints refer.

In 1946, a new building was constructed in Hanna Street, South Melbourne as the headquarters of the Repatriation Commission (Figure 18). The two-storey building was to accommodate 'about 800 employees, doctors, dentists, a records branch and a cafeteria.'<sup>17</sup> The building was located at 121-145 Hanna Street, with the Commission having been relocated from leased premises in the city.<sup>18</sup> The site was a former South Melbourne Council metal depot located on Crown land, to be occupied by the Repatriation Commission on a long-term, but temporary basis.<sup>19</sup> At the announcement of its construction, the Minister for Repatriation stated that 'to help incapacitated soldiers more convenient premises should be provided than the present temporary repatriation offices in Elizabeth Street north'.<sup>20</sup> No articles linking the construction of this building with the location of the subject building have been located; rather, the proximity to the out-patient clinic at Victoria Barracks and earlier repatriation office at the corner of St Kilda Road and Coventry Street, and the availability of land at the Hanna Street site appear to have been the main reasons for the site's selection.<sup>21</sup>



Figure 18 Repatriation Offices, Hanna Street, South Melbourne, in c. 1957  
Source: B6295, 292B, National Archives of Australia

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<sup>15</sup> *Sands & McDougall directory*, 1930, see City South section, pp. 50-55.

<sup>16</sup> *The Age*, 9 December 1937, p. 19; *The Argus*, 3 August 1939, p. 2.

<sup>17</sup> *The Argus*, 17 April 1946, p. 28.

<sup>18</sup> *The Herald*, 28 September 1948, p. 8; *The Age*, 19 November 1949, p. 17.

<sup>19</sup> *Record*, 21 April 1945, p. 4.

<sup>20</sup> *The Herald*, 3 October 1945, p. 5.

<sup>21</sup> *The Herald*, 19 March 1945, p. 3.

The *Sands & McDougall* directory of 1950 show that there continued to be a defence presence in the area in this post-war period (Figure 19). Aside from the Repatriation Office, and the Commonwealth artificial limb factory, there was an army depot on Sturt Street, and another on Wadey Street, part of Victoria Barracks, the RAAF canteen service on Coventry Street, the Commonwealth Clothing Factory on Miles Street. The area by this time, however, was predominantly light industrial.<sup>22</sup> The Repatriation Office was demolished in the 1970s.<sup>23</sup> The clothing factory was demolished, and the remount/drill hall/army depot site is now the entry to city link. Besides the altered former limb factory, the Victoria Barracks and the adjacent former Repatriation offices, are the only other remaining building constructed as Defence related facilities.

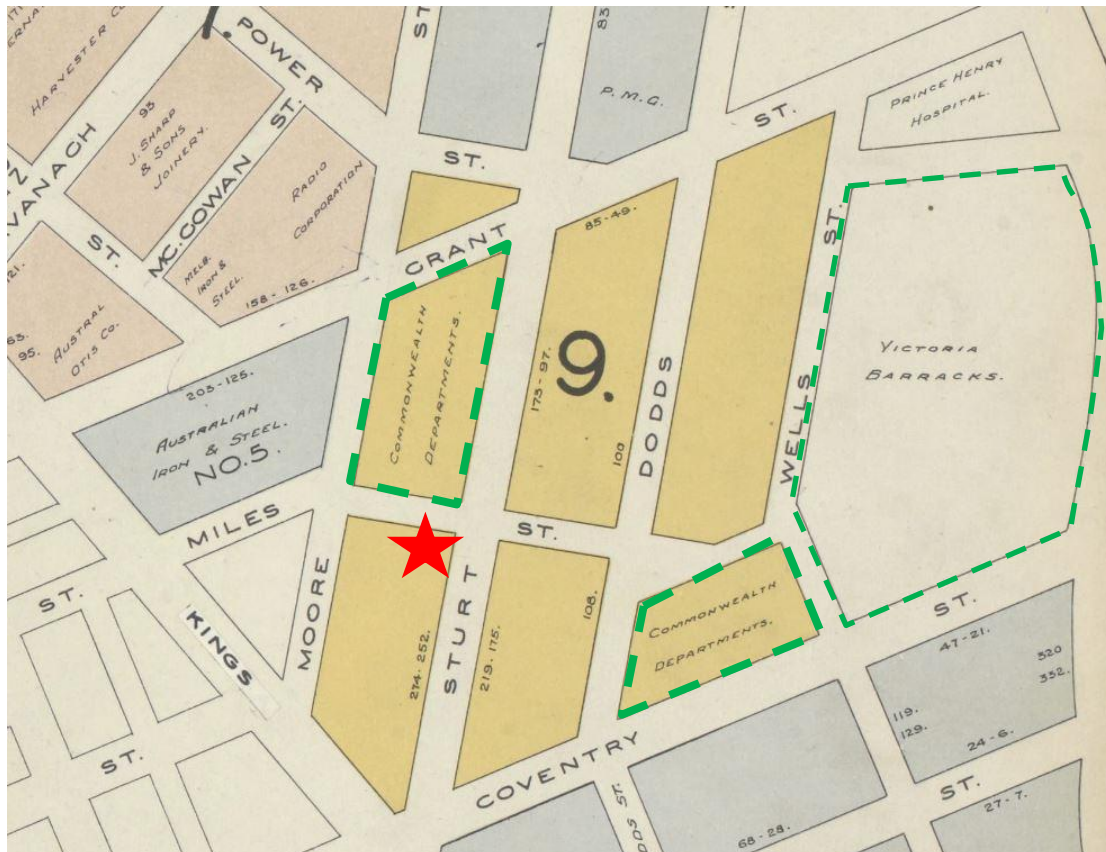


Figure 19 Detail of Mahlstedt fire insurance plan, South Melbourne, plan no. 1, 1950-1954, location of subject site indicated by star, location of Department of Defence land in the 1950s outlined in green

Source: State Library of Victoria

### Conclusion

In the years following both the First and Second World Wars various support activities and services were provided to returning service personnel. Depending upon the nature of the activity these were accommodated in newly constructed or existing buildings in various locations around Melbourne and beyond. As described there was a concentration of Defence Department support related facilities in the South Melbourne area, including the South Melbourne Repatriation Office (now demolished) on Hanna

<sup>22</sup> *Sands & McDougall* directory, 1950, see City South section, pp. 58-60.

<sup>23</sup> Historical aerial photographs of South Melbourne, 1970 and 1979, Central Plan Office, Landata, Victorian Land Registry Services.

Street (now Kings Way), the Clothing Factory located in the block bound by Wells, Miles, Dodds and Coventry streets and the Commonwealth Defence Remount Department in the block bound by Sturt, Grant, Moore and Miles streets.

The concentration of Defence Department related activities in this area presents as a logical and pragmatic outcome related to the proximity to Victoria Barracks in St Kilda Road and the existence of suitable/available land. It is a development outcome which is of interest historically, but in the loss of much of the associated built form is one which does not present as of an elevated level of significance.

More specifically, as evidencing this concentration of activity, the artificial limb factory, was physically a quite minor development and not one, in its now much evolved form, which provides any overt pointer to its association with Defence Department related activity. Even when constructed, other than for signage, the building presents as having been one of a generic typology and not one which, in its design, could be associated with its specific function; a reality which is even more so the case in its now transformed state.

In drawing this conclusion it is commented that while 'Defending the city' is a theme identified in the history of the city's urban environment, this particular area and phase of development is not identified.<sup>24</sup> It is an area which, had fabric survived might well have constituted an important precinct to which the subject site would have contributed, but this is not the case and this one building in isolation is not of sufficient individual significance to sustain this proposition.

#### 5.1.2 Health services

It is also noted that the draft citation identifies the place as falling within the historical theme, 'Caring for the sick'.<sup>25</sup> As with the theme of Defending the city, this facility is not identified or referenced, nor does it stand out as an important facility or institution.

By way of comparison with other service specific health facilities of a similar scale in Melbourne it can be compared with the former Venereal Diseases (VD) Clinic, of 1918-19, at 372-378 Little Lonsdale Street and the adjacent 1929 TB Clinic, at 364 Little Lonsdale Street (Figure 20 & Figure 21). The former VD clinic is a significant building under the heritage overlay (HO1061) and currently included in a major redevelopment for Victoria University. It is also C graded and identified as meeting criteria A (historical value) and E (aesthetic/architectural value). Prior to redevelopment it was substantially externally intact and noted for aesthetic reasons as 'an early if modest Georgian revival design under the eminent Government Chief Architect E. Evan Smith'.<sup>26</sup>

In comparison the former TB clinic on the adjacent site, while seemingly also graded C in earlier studies, never received heritage listing and has recently been demolished. It is a building of equally modest design pretensions but one which was externally largely intact and evidenced an important health initiative in managing the wellbeing of Melburnians.

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<sup>24</sup> City of Melbourne, *Thematic History, A History of Melbourne's Urban Environment*, 2012, 'Defending the City', p36-37

<sup>25</sup> Biosis, Southbank and Fishermans Bend Heritage Review, June 2017, pp. 526-527

<sup>26</sup> City of Melbourne, *Central City (Hoddle Grid) Heritage Review* prepared by Graeme Butler & Associates, 2011





Figure 20 Former VD Clinic at 372-378 Little Lonsdale Street  
Source: Lovell Chen, 2018



Figure 21 Former TB Clinic, 364 Little Lonsdale Street  
Source: Lovell Chen, 2018

## Conclusion

In the context of the activities undertaken in these buildings, the production and fitting of prosthetics presents as an activity which while important to the wellbeing of impacted members of the community has lesser weight in a citywide context as related to broader health and wellbeing. It is not an activity which presents as important in the course or pattern of Melbourne's history.

5.1.3 *Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance)*

The proposition that this is a place of social value has not been explored in the relevant citation and the basis for the claim is unclear. The most recent work on the assessment of social value in a heritage context is that published by the Heritage Council of Victoria in their 'The Victorian Heritage Register Criteria and Threshold Guidelines'.<sup>27</sup> While directed at the state level threshold the guidelines provide a methodology in assessing the collective attachment to a place. In demonstrating that social value exists the guidelines identify three facets of social value to be met.

- a) Existence of a community or cultural group.
- b) Existence of a strong attachment of a community or cultural group to a place or object.
- c) Existence of a time depth to that attachment.

In this case the group might be determined to be those serviced by the facility in the provision of prostheses. On the basis that the group was primarily made up of returned service personnel and those who were entitled to such services provided by the Repatriation Commission, it is a group which over time has diminished. A limited exploration of the annual reports of the Repatriation Commission indicates that from the beginning of the 1980s demand was plateauing a process which ultimately lead to closure and sale. Given a lapse of some 25 years from the date of closure and even longer from the date at which demand was strong, the existence of community group with an active attachment to the place is considered unlikely. It is further commented that even if such a group existed it would be unlikely to be a group which had any specific relevance to Melbourne as a municipality.

If such a group existed, it is further open to question whether or not the attachment was strong such that it warrants recognition as an attachment beyond the ordinary. By way of comparison it is likely that all active RSLs might be determined to be of social value within a particular community. The social value is dependent upon the place operating such that there is continuous community interaction. Once closed and sold, the active community attachment to the place diminishes and the association with that community becomes part of the historic value. Unlike an RSL the Artificial Limb factory was a place visited for a service. It is not known how often clients visited the factory and to what degree they associated with each other. As such this is not a place which presents as likely to have had or has a strong attachment by a group such that this measure of social value is met.

In the absence of a clear demonstration that the place meets either of the first measures, the time-depth of the attachment is no longer relevant. Without a community with a strong attachment to the place there is no ability to assess the time depth proposition.

The final consideration in assessing social value is whether it can be demonstrated that social value resonates across the broader community, in this case at a local level and that the social value is part of a story that contributes to Melbourne's identity. The reality of this place is that it was one of a small number of such places which serviced the state and as such it has little specific link to Melbourne as a

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<sup>27</sup> Heritage Council Victoria, The Victorian Heritage Register Criteria and Threshold Guidelines, 2012, (reviewed and updated 4 April 2019), pp.18-19

municipality. It is additionally not a place in which social value resonates across the community whether or local or at a state level. As such it is not a place which in my view has been demonstrated to meet the local threshold for identification for reasons of social value

## 5.2 Impact of alterations

In addressing the issue of the alterations to this building it is recognised that the assessment identifies that the place satisfies Criteria A and G. It does not conclude that it satisfies Criterion D (representativeness) or Criterion E (aesthetic/architectural value). Notwithstanding, the visual presentation of a place is a factor of relevance in that for the vast majority of heritage listed places it is the appearance of the place which triggers the initial proposition that this might be a place of interest.

In this context and as relevant to this place, the question of altered places is recognised in the definition of 'C' grading which notes (my underlining):

'C' buildings. Demonstrate the historical or social development of the local area and /or make an important aesthetic or scientific contribution. These buildings comprise a variety of styles and building types. Architecturally they are substantially intact, but where altered, it is reversible. In some instances, buildings of high individual historic, scientific or social significance may have a greater degree of alteration.<sup>28</sup>

In addressing the issue of more extensive alterations and their impact, the definition requires that the place must be of 'high' individual historic, scientific or social significance'. In my assessment this is a place which exhibits a greater degree of alteration, but not one where the historical and social significance of the place is high.

As discussed above, the building has undergone a number of alterations to the external presentation including the first-floor addition at the north-east corner, panels to the first floor of the north façade, infilling of some openings and the creation of new opening to the east façade. While the transformed structure still evidences the original 1945 structure as expanded to accommodate the growth in operations and subsequently adaptation for a new use, it is a structure which no longer has a strongly coherent architectural form.

### Conclusion

In considering this issue it is noted that the statement of significance for the place identifies as contributory elements:

- the parapeted two-storey form with pitched roof behind;
- articulated brick facades; and
- steel framed windows.

While these elements are associated with the building as an example of a building in the Moderne style, the design is not identified as contributing to the significance of the place and it is not clear why such elements ahead of others should be elevated. The parapeted two-storey form, as modified, dates from the 1970s and the roof behind is a flat roof, not pitched. The articulated brick facades date from the 1945 works as extruded upwards in the 1950s, an action which does not enhance the aesthetic presentation. The steel windows are common to the style and in themselves are of limited importance.

In practice the building presents as a modified Moderne factory building which is of limited aesthetic/architectural interest. While it is possible that some of the changes might be reversed

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<sup>28</sup> Melbourne Planning Scheme, Clause 22.05 Heritage Places Outside the Capital City Zone, p 5 – <https://www.planning.vic.gov.au/schemes-and-amendments/browse-planning-scheme/planning-scheme?f.Scheme%7CplanningSchemeName=Melbourne> accessed on 6 March 2020.

(removal of paint, removal of the northern screen) there is no certainty that this will occur and the building has to be assessed as it presents today.

### 5.3 Comparative analysis

Addressing like places, the citation contained in the *Southbank and Fishermans Bend Heritage Review* noted as follows in relation to the subject site.

This simple, brick-walled and sawtooth-roof building is characteristic of the inter-war period, with some similarities in its original form to the administration buildings at the Government Aircraft Factory and Materials Research Laboratories.<sup>29</sup>

*Applying the Heritage Overlay, Planning Practice Note 1, August 2018* states the following regarding comparisons.

To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those previously included in a heritage register or overlay. Places identified to be of potential state significance should undergo analysis on a broader (statewide) comparative basis.<sup>30</sup>

The full Biosis Southbank and Fishermans Bend Heritage Review report was reviewed to identify comparison sites with a focus on those site which exhibited three or more of the following points:

- Buildings constructed during the interwar period,
- Buildings that contain no existing grading and are proposed as C grade in the report and individually significant,
- Buildings constructed by the government,
- Brick buildings, and
- Factory buildings.

Four sites were identified:

- Thornycroft (Aust) Ltd, later Herald Sun television studio, 49-61 Coventry Street, Southbank (Figure 22)
- Government Aircraft Factory (GAF) Boeing, 226 Lorimer Street, Port Melbourne (Figure 23)
- SEC electricity substation, 224 Salmon Street, Port Melbourne (Figure 24)
- General Post Office (GPO) garage, stores & workshops, 45-99 Sturt Street, Southbank (Figure 25)

With the exception of the Thornycroft site, all sites were identified as historically and aesthetically significant. The Thornycroft site was identified as historically significant alone, primarily as related to its more recent use as part of the HSV 7 studios. The three sites identified for historical and aesthetic values are all large sites with major buildings of some architectural distinction. By way of comparison the Thornycroft site is more closely related to 242-246 Sturt Street. This site however has a far more recent history of use as part of a television studio and one which may well resonate with members of

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<sup>29</sup> Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 528 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) sourced 7 June 2019.

<sup>30</sup> Applying the Heritage Overlay, Planning Practice Note 1, August 2018, p. 2. Available at: [https://www.planning.vic.gov.au/\\_data/assets/pdf\\_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf](https://www.planning.vic.gov.au/_data/assets/pdf_file/0030/96555/PPN01-Applying-the-Heritage-Overlay.pdf). Source 7 March 2020.



the community who visited the place. As such it stands as potentially more significant than the subject site.



Figure 22 Thornycroft (Aust) Ltd, later Herald Sun television studio, 49-61 Coventry Street, Southbank  
Source: Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 383 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) accessed on 7 June 2019



Figure 23 Government Aircraft Factory (GAF) Boeing, 226 Lorimer Street, Port Melbourne  
Source: Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 417 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) accessed on 7 June 2019



Figure 24 SEC electricity substation, 224 Salmon Street, Port Melbourne  
Source: Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 462 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) accessed on 7 June 2019



Figure 25 General Post Office (GPO) garage, stores & workshops, 45-99 Sturt Street, Southbank  
Source: Southbank and Fishermans Bend Heritage Review, Biosis Pty Ltd, Graeme Butler & Associates 2017: Appendix 3. p. 516 [https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search\\_mode=id](https://www.planning.vic.gov.au/schemes-and-amendments/browse-amendments?query=C305melb&search_mode=id) accessed on 7 June 2019

As compared across all of these sites, including the former Materials Research Laboratories (now AMRL) in Lorimer Street, the subject site presents as a place of lesser significance in both an historical and aesthetic/architectural context.

## 6.0 Conclusion and recommendations

In assessing the cultural significance of such places, more often than not it is assessed as relating to the history of the place and additionally its aesthetic/architectural value. Relatively few are assessed as places of significance for historical value, and in this case social value, in isolation. In this regard the relevant Planning Practice Note 1, Applying the Heritage Overlay states:

### Places of significance for historical or social reasons

Planning is about managing the environment and its changes. An appropriate test for a potential heritage place to pass in order to apply the Heritage Overlay is that it has 'something' to be managed. This 'something' is usually tangible but it may, for example, be an absence of built form or the presence of some other special

characteristic. If such things are present, there will be something to manage and the Heritage Overlay may be applied.

If not, a commemorative plaque is an appropriate way of signifying the importance of the place to the local community.

In this case the 'something' to be managed is an undistinguished and altered building of no aesthetic/architectural value. While the citation identifies elements which are considered contributory these are in themselves undistinguished. Accordingly, the justification for the application of the heritage overlay based on historical and social value needs to be well founded.

As evidencing the history of the provision of services to returning service personnel, 242-246 Sturt Street does so to a limited degree, but not at a level such that it is of importance to the course or pattern of Melbourne's cultural history thereby warranting the application of the heritage overlay. Albeit one of a number of buildings which were constructed for Defence related and support activities, 242-246 Sturt Street now stands in relative isolation. In its evolved state it is not a building which readily conveys an understanding of its past use, nor is it one which has been identified as of significance for its appearance or architecture. While a building which might be assessed as contributory for reasons of its historical value within a related precinct, it is not of such individual importance so as to warrant elevation as an individually significant place.

Regarding social value, it is thought unlikely that 242-246 Sturt Street has any active association with a group who might retain a strong attachment to the place. With the lapse of some 25 years since it was last associated with the manufacture and fitting of artificial limbs any values which relate to that activity and those associated with it are now largely historic. As such it is not evident that the threshold of social value is met at any level.

As a consequence of a review of the proposed application of the Heritage Overlay to 242-246 Sturt Street, Southbank, I do not believe that the value associated with this place are met at a high enough level to warrant the application of the overlay. The former Artificial Limb Factory at 242-246 Sturt Street, South Melbourne is of some interest historically to the City of Melbourne for its associations with the manufacturing and fitting of artificial limbs for returned service personnel, and as located in an area which once had a strong presence of Defence related facilities. It is however an altered building which long ago has lost any direct connection to its original function and is no longer located in a Defence facilities context.