

TOMLINS, SIMMIE & CO.
BENDIGO FLOUR MILLS

DJA DJA WURRUNG COUNTRY
87 CHARLESTON ROAD,
BENDIGO

HERITAGE IMPACT STATEMENT
- ADDENDUM
REGARDING A PROPOSED
SUBDIVISION OF A
FORMER FLOUR MILL SITE &
ASSOCIATED WORKS



PETER ANDREW BARRETT

APRIL 2025

Heritage Impact Statement – Addendum - for: -

Tomlins, Simmie & Co
Bendigo Flour Mills
Dja Dja Wurrung Country
87 Charleston Road, Bendigo.

Victorian Heritage Register Number for Place: -

H2433

This statement forms part of a permit application: -

To subdivide this site into three allotments.

Pre-application Advice: –

Pre-application heritage advice has been provided by Heritage Victoria.

This Heritage Impact Statement is prepared by:

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Prepared for:

Clancy Blue Pty Ltd

Date:

8 April 2025

Purpose of this Heritage Impact Statement - Addendum:

The purpose of this the heritage impact statement addendum is to provide further comment, from a heritage perspective, on a proposal to subdivide the former Tomlins, Simmie & Company, Bendigo Flour Mills site into three allotments. Correspondence received from Heritage Victoria has requested that a heritage consultant be engaged to provide input into the masterplan that has been prepared for this site.

This addendum to the heritage impact statement seeks to address a number of questions in relation to the proposed works including:

- What physical and/or visual impacts will result from the proposed subdivision and proposed built form; and their effects on the cultural significance of this heritage place?
- What measures can be adopted to mitigate any minor impacts from the proposed works and/or provide a better heritage response?
- Are the proposed works, on balance, a satisfactory outcome, given the recognised heritage values intrinsic to this site?

This addendum, where necessary, makes comments and, in places, recommendations for changes to the masterplan to achieve a finer response to this heritage place.

Methodology

This report is prepared with regard to *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013* [hereon referred to as the *Burra Charter*], which is the recognised standard of heritage practice in Australia.

This report must also be read in conjunction with the heritage impact statement prepared by Aspect Planning, which is titled 'Heritage Impact Statement Master Plan for 87 Charleston Road, Bendigo', dated 24 February 2025.

This report is made with regard to the Heritage Act, 2017 (authorised version incorporating amendments as at 1 February 2024). The purpose of the Heritage Act 2017, in part, is to provide for the protection and conservation of the cultural heritage of the State of Victoria. The Tomlins, Simmie & Company [hereon abbreviated to 'Co'], Bendigo Flour Mills, is a site that is included on the Heritage Council of Victoria, *Victorian Heritage Register* – H2433, Tomlins, Simmie & Co Flour Mill, 87 Charleston Road, Bendigo. This report must be read in conjunction with the citation for this site on the Heritage Council of Victoria *Victorian Heritage Register*.

The Tomlins, Simmie & Co, Bendigo Flour Mill, is also a place of Local significance to the *City of Greater Bendigo*, and as a consequence it is subject to a site-specific heritage overlay in the *City of Greater Bendigo Planning Scheme - HO107 Tomlins Simmie & Co Flour Mill, 87 Charleston Road, Bendigo*. The purpose of this heritage overlay is to conserve and enhance this heritage place, and to ensure that any new works (including subdivision) does not adversely affect this heritage place. The previously discussed *Burra Charter* is a Policy Guideline in the *Greater Bendigo Planning Scheme*.

The site was inspected on 20 March 2025. The exterior and interior of the mill and the stables were inspected, and the environs of the site was also inspected.

Attached to the end of this report are photographs of the complex located during the preparation of this document, which may be of assistance in the future development of this site.

Source of Information

This assessment of the proposed subdivision is based upon a masterplan of the site prepared by Project Now Architects, which is titled [cover sheet] 'Redevelopment Works at 87 Charleston Road, Bendigo, Proposed Master Plan Drawings', version 1, 'Issued for Discussion', dated 11 February 2025. These drawings of the proposed subdivision must be referenced when reading this heritage impact statement.

The author of this report has had no previous input into the preparation of the masterplan. Comment has previously been made on the design response of the proposed building on the proposed Allotment 1 – [Peter Andrew Barrett, Letter to Heritage Victoria, dated 28 November 2024]. I understand that the design of that building has since been amended, and, as a consequence, the subdivision boundaries between Allotments 1 & 2 have been realigned. I have reviewed drawings of this amended design prepared by Planwise and these are titled 'Proposed Development David Bolton Family Trust 87 Charleston Road, Bendigo', and are dated 20 February 2025.

The description and, to some extent, the history of this site is adequately documented in the citation on the Heritage Council of Victoria *Victorian Heritage Register*, and in the Aspect Planning 'Heritage Impact Statement Master Plan...', dated 24 February 2025. Where required, additional commentary has been added in this report to the history and description, but reproduction of full extracts of the history and description from these other documents is not incorporated into this report in order to avoid duplication and/or voluminous background information. Where additional historical research has been undertaken, the source of that information is noted in footnotes.

What is the cultural heritage significance of the place and its setting?

The Tomlins, Simmie & Co, Bendigo Flour Mills, is a site of State significance, demonstrated by its inclusion on the Heritage Council of Victoria *Victorian Heritage Register* – H2433, Tomlins, Simmie & Co Flour Mill, 87 Charleston Road, Bendigo.

The site's cultural significance is historical (HERCON Criterion A) and representative (HERCON Criterion D) values. The Heritage Council of Victoria *Victorian Heritage Register* citation notes these heritage values are derived from:

The Tomlins Simmie and Co Flour Mill is historically significant for its association with the flour milling industry in Victoria. From the 1830s until the mid-twentieth century, flour milling played a vital role in the health and economy of towns across Victoria. By the 1950s, Victoria was a major international exporter of flour to nations including South Africa, India, and China. Through the retention of key fixtures and machinery, the Tomlins Simmie and Co Flour Mill clearly demonstrates the processes of storing, cleaning, and milling grain. It allows the wheat milling process of the early twentieth century to be better understood than other comparable places in Victoria. It has the additional distinction of being the first electric powered flour mill in Victoria. [Criterion A]

The Tomlins Simmie and Co Flour Mill is architecturally significant as a fine and highly intact example of a twentieth-century flour mill, built in an advantageous setting on the Bendigo-Swan Hill/Echuca railway line. The flour mill building (constructed in 1912) exhibits one of the most intact mill interiors in Victoria, having retained a wide array of fixtures and objects integral including grain elevators, chutes, hoppers, flywheels, rotating shafts, fireproof doors, internal timber-clad silos, early roller mills and electric motor. The internal layout of the flour mill also reflects the early milling process, with the storage silos concealed behind the windowless portions of the building; grain distribution and cleaning undertaken in the department adjacent to the railway; and the flour milling undertaken in the southern section of the building. Later additions, including the gas suction room and engine room (built c.1929) demonstrate the expanding capabilities of the mill during the early twentieth century. [Criterion D]

It is accurate to say this complex is of historical significance to Victoria. It is an intact example of a later generation of mill complexes that were built in the early twentieth century in this State. Unlike nineteenth century flour mills, which relied upon steam power and, in some cases, were powered by water/waterwheels (eg Carome Mill, Mernda), these later examples like the Tomlins, Simmie & Co mill were electrically driven in full or in part.

In addition to playing an important role in the 'health(?) and economy' of towns across the State of Victoria, the statement of significance should note that flour mills also provided employment to the residents of these towns. It is recommended that clarification is given as to how the mills of Victoria impacted upon the 'health' of towns.

The importance of the siting of the Tomlins, Simmie & Co mill adjacent to the railway line at North Bendigo junction, was not only 'advantageous' but strategic. North Bendigo is the junction of three lines (Swan Hill, Echuca, and Heathcote lines [and their branches]), all led from the wheat belts of the northwest and north of the State. At the time of the opening of the mill, the Victorian Railways was implementing the expansion of railways to service grain centres in the Wimmera and Mallee.

From Bendigo, these railway lines led onwards to the ports of Melbourne, Geelong and Portland,¹ which provided the crucial access to the firm's overseas markets. The relationship of the railways with the Tomlins, Simmie & Co complex is understated in the *Victorian Heritage Register* citation, the fact lost that it was the spread of the railways across Victoria that opened up the wheat belt north of the Great Divide.²

The Tomlins, Simmie & Co, Bendigo Flour Mill is recognised to be of Local heritage significance to the *City of Greater Bendigo*. There is no known statement of significance in the *Greater Bendigo Planning Scheme* for this heritage overlay, as no statement of significance is included in the citation in the Butler, 'Eaglehawk and Bendigo Heritage Study – Significant Sites' [vol 1, pp 499-500].

At a Local level, the Tomlins, Simmie & Company complex, in particular its tower, is a landmark element in Bendigo, visible from a good distance in its environs. It is this landmark quality that needs to also be taken into consideration when assessing this site and in any future development of the site.

Current use of this place?

Vacant.

Existing condition of the place?

Fair. In parts, the mill and the stables/garage are showing signs of damage, much of this from vandalism.

¹ Robert Lee, *The Railways of Victoria 1854 – 2004*, p 140.
² Ibid, pp 110.

Proposed Subdivision and Proposed Future Works

The proposed works involve subdivision of the Tomlins, Simmie & Co site into three allotments. These allotments are oriented east-west from Charleston Road to Victrack land that contains the railway line. The central allotment, Lot 2, contains the buildings of the Tomlins, Simmie & Co complex built in the early twentieth century. This places significant heritage constraints on how this central lot is redeveloped in the future. Proposed lots 1 & 3 have less constraints because of the absence of historic built form.

The development of all lots must retain the landmark quality of the Tomlins, Simmie & Company mill, and retain historic view lines from the east in Charleston Road, and from the west in Tomlins Street.

*Figure 1: Aerial view of North Bendigo c1930, the Tomlins, Simmie & Company site is visible at the top right corner.
Source of image: State Library of Victoria*



An inter-war aerial photograph of the site shows that housing was built along the Charleston Road frontage – refer to Figure 1. Unobstructed views of the complex were previously along a landscaped drive leading from Charleston Road – refer to Figure 2. The removal of this housing has impacted upon how the site is viewed today, this existing open character viewed from both Charleston Road and Lansell Street is not historic, but of more recent origin.

The incorporation of a proposed drive leading from Charleston Road towards the former Tomlins, Simmie & Company mill complex, references the earlier landscaped drive on this part of the site.³ It is a good design response that will allow historic view lines to be reinstated from Charleston Road. It is recommended that landscaping along the drive is low, so as not to obscure sightlines of the mill from along this drive.

Figure 2: A series of photographs of the complex including a photo of the mill from the landscaped drive (marked with the red arrow). Source of image: Harry Biggs Collection from the Bendigo Historical Society Inc.



In terms of the Charleston Road frontage, the proposed car parking on Allotment 3 should be reconfigured to remove parking bays immediately adjacent to the road. These car parking spaces should be substituted with landscaping. Landscaping on the Charleston Road frontage will soften the interface between the subject site and the public realm, and will also reference the garden setbacks of housing formerly on this Charleston Road frontage.

I have recommended that new built form on Lots 1 & 3 adopt an industrial aesthetic in terms of materiality and detailing, referencing that of the Tomlins, Simmie & Company mill. In the drawings that I have reviewed, these recommendations have been satisfactorily adopted, where the materiality is brick relieved with render, and a robust trabeated architectural expression is used.

What detrimental physical and visual impacts will result from the proposed works: and their effects on the cultural significance of this, or any surrounding, heritage place?

Some physical and visual impacts will result from the proposed subdivision and future works proposed. None, however, can be considered detrimental impacts, as they do not impact upon the inherent heritage values of this place.

The subdivision of the site into three allotments and the future development of allotments 1 & 3 with new built form will alter the existing appearance of this site and views to it from Charleston Road. However, mostly these are not historic views, rather views that were created when housing was removed from the site's frontage. Mitigating any impacts from the proposed subdivision and works, is the removal of the former administration building at the Charleston Road boundary, that currently obscures views of the mill from Charleston Road – Refer to Figure 3.

Figure 3: Removal of the existing administration building on the Charleston Road frontage will enable views of the mill directly at its front. Source of image: Peter Andrew Barrett Collection.



Stables/Garage

The proposed removal of the former stables/shed removes an element that is, in part, of early origin, but in its existing altered condition (that includes a brick addition on its north side), provides little understanding of its former use as a stable and its contribution to the broader site. Aside from a Dutch door, there is little evidence in its fabric of this once being a stable and later a garage – refer to Figures 4 & 5.

Figure 4: Former stables and garage. The brick addition to the building is partially visible at right. Source of image: Peter Andrew Barrett Collection.



Figure 5: The interior of the former stables and garage, provides little evidence of its former use. Source of image: Peter Andrew Barrett Collection.



As a national and international supplier of flour, the use of horse drawn vehicles and later lorries at the Bendigo Flour Mill would have been minimal; at least in comparison to rail transportation, which was the prime method of movement of raw materials from the wheat belts of North and North West Victoria to this site; and the milled flour onwards to the ports of Melbourne, Geelong and Portland. In this regard, the emphasis of the importance of the stables is overstated. Rather, it is the site's association with the railway that needs greater recognition.

If there are impacts, why should the proposed subdivision and the building works be permitted; and the reasons why the proposed works were chosen, and why other sympathetic options were not feasible?

There are no significant detrimental physical and visual impacts resulting from these proposed works, none that will at least impact upon an understanding of this site's industrial heritage and its inherent heritage values.

The visual impacts from new built form are minimized by its adoption of an appropriate scale (single-storey), and materiality (brick and render) and detailing (wide trabeated expression of openings) that reference the Tomlins, Simmie & Co mill. The buildings proposed for Allotments 1 & 3, adopt splade corners adjacent to Allotment 2, softening the corners of these buildings when seen as foreground objects in views to the mill from Charleston Road. This splade massing leads the eye towards the mill, and adopts a historic design approach of establishing hierarchy in the grouping of built form – where the splade corner buildings are perceived as secondary built form and acknowledging the mill as the primary built form in this context.

It is acknowledged that the proposed removal of the former stable/garage will remove an early element of the site. However, it is not an element that is of primary significance to this site and its interpretation. In its current altered condition, and with the absence of horse stalls and other objects related to stables (apart from a Dutch door), there is little evidence in its physical fabric of its original purpose to warrant retention.

What measures can be adopted to mitigate any minor impacts from the proposed works and/or provide a better heritage response?

The design is responsive to the site and its mill, and already incorporates a number of measures to enhance the heritage character of this site. These include landscaping which provides an improved interface with the site and the public realm, and proposed built form of appropriate scale, materiality and architectural expression.

Recommended measures that can be adopted to mitigate impacts, or provide a finer heritage response, or a greater understanding of the significance of this site include:

- The site and its future development needs to reference the Dja Dja Wurrung, the First Nations People of this area. They have the longest association with this site of any people, group, organisation or government. Their association with this site and the broader country, and their culture, should be noted and celebrated in future development of this site. Any interpretative measure must be done in conjunction with the Dja Dja Wurrung Clans Aboriginal Corporation;
- Landscaping on the site should extend beyond aesthetic considerations. It should incorporate other sensory aspects including aromatic and texture/feel. Plants that are indigenous to Victoria, in particular Central Victoria, should be used in preference to others;
- Substitution of car parking spaces along the Charleston Road boundary with landscaping will provide a better interface between the subject site and the public realm;
- Use of low landscaping along the proposed drive leading from Charleston Road to the mill on Allotment 2. This will maintain views of the mill from Charleston Road.
- Amend the masterplan drawings to note the singular 'railway track' instead of plural 'railway tracks' on the Project Now 'Subdivision Plans'.
- The Heritage Council of Victoria statement of significance on the *Victorian Heritage Register* for the Tomlins, Simmie & Co mill is in need of refinement. Areas that are in need of attention include the role that these mills played in employment in towns; and the important relationship between the Tomlins, Simmie & Co mill and the adjacent railway line, which is mentioned but its importance understated.

Other Conservation Measures – Mill

A proposal for the adaptive re-use of the mill on allotment 2 is still to be finalised. Pending a thorough assessment and preparation of a schedule of conservation works, in the interim it is recommended that a number of measures are implemented to secure the building and prevent deterioration of its fabric including:

- Securing the building to prevent intruders, vandals and/or urban explorers;
- A number of holes were noted in the flooring of the mill. These should be securely covered to prevent injury.
- Seal window openings that have broken glazing, to prevent birds and vermin entering the building;
- Vermin was noted at the building at the inspection. Pest control measures should be implemented to remove, or at least reduce, the presence of vermin;
- Removal of bird droppings from the exterior and interior of the building, which will cause deterioration of historic fabric.

Figure 6: It is recommended that holes in the floors of the mill are covered and that bird droppings are removed as soon as possible. Source of Photograph: Peter Andrew Barrett Collection.



Figure 7: Replace broken glazing to prevent water and birds entering the building. Source of image: Peter Andrew Barrett Collection.



Are the proposed works, on balance, a satisfactory outcome, given the recognised heritage values intrinsic to this site and its environs?

On balance, the proposed subdivision is a good design response to this heritage place. As a sum, the three allotments and the built form (new and old) recognise and celebrate the industrial heritage of this site.

This site forms a broader industrial landscape, a landscape that has seen significant change in recent decades with the removal of the stockyard and allied industry east of Charleston Road (now Bendigo TAFE), and with rationalisation of rail infrastructure that has removed the sidings that once defined much of this area.

Despite this change, physical evidence of this historic industrial landscape remains. In addition to the subject site, contained within this industrial landscape is the woollen mills to the west, the Victoria Carpets plant to the north, and further north the North Bendigo Railway Workshops. The subject site should therefore not be considered in isolation, but also as part of a broader industrial landscape.

The proposed subdivision and new built form on the site will be further change to this industrial area. Unlike much of the earlier change, it will be change that is coordinated through master planning, change that recognises and conserves the industrial heritage of this site.

It is fortunate that the early twentieth century Tomlins, Simmie & Co mill complex is situated on one portion of the site. This has enabled this important heritage component to be on one allotment, which will assist in a uniform approach to the conservation and future management of the mill.

The built form proposed for allotments 1 & 3 are designed to reference the mill in terms of materiality and architectural expression and detailing. The widening of the built form on Allotment 1 by 3.8 metres, caused by the realignment of the boundary between Allotments 1 & 2, has had a minor impact on the overall visibility of the mill from Charleston Road. However, this visual impact is mitigated by the removal of the existing administration building, which currently obscures views of the mill from Charleston Road.

The removal of railway sidings that accessed the Tomlins, Simmie & Co flour mill, has removed evidence of the strategic siting of this complex adjacent to main railway lines of this State that led between the wheat belt further north and northwest, and that accessed the ports of Melbourne, Geelong and Portland. It is this important historical theme that needs to be recognised and properly represented in future development of the site, particularly with interpretative measures.

In this regard to the site's important relationship with the railway, the proposed removal of an altered timber shed, which formerly was used as a stable, and later a garage, will not have the same impact as the removal of railway infrastructure has had on an understanding of this site. In this regard, the altered stables can be removed with little impact upon interpretation of the site.

It is rare for an industrial building that has been decommissioned to contain so much of its original plant and equipment. The Tomlins, Simmie & Co mill provides physical evidence of the processes that once took place in the making of flour and associated grain products here. The discussions with the owner of Allotment 2, which contains the mill, is the vision for this portion of the site is to retain original plant and machinery in any future development, so these former processes and uses at the mill can be understood. This initiative by the owner is to be encouraged.

The former Tomlins, Simmie & Co flour mill is a tall and robust built form. As one of Bendigo's tallest structures, it commands a landmark quality in the city. This quality needs to be conserved and enhanced. The proposed built form on Allotments 1 & 3 is complementary in scale, siting, materiality and architectural expression to the existing mill complex. This new built form will not compete with the flour mill's landmark qualities; rather enhance them, by activating the site and reinforcing it as a destination that is known, used and valued in Bendigo.

Conclusion

I believe the proposed subdivision, and the built form proposed for portions of this site, provide a good heritage response. I am of the view that they have potential to activate this site without impacting upon in any significant way the inherent heritage values of the Tomlins, Simmie & Co, Bendigo Flour Mill.

It is on the basis, outlined in this heritage impact statement – addendum, that I believe the proposed works are supportable from a heritage perspective.



Peter Barrett
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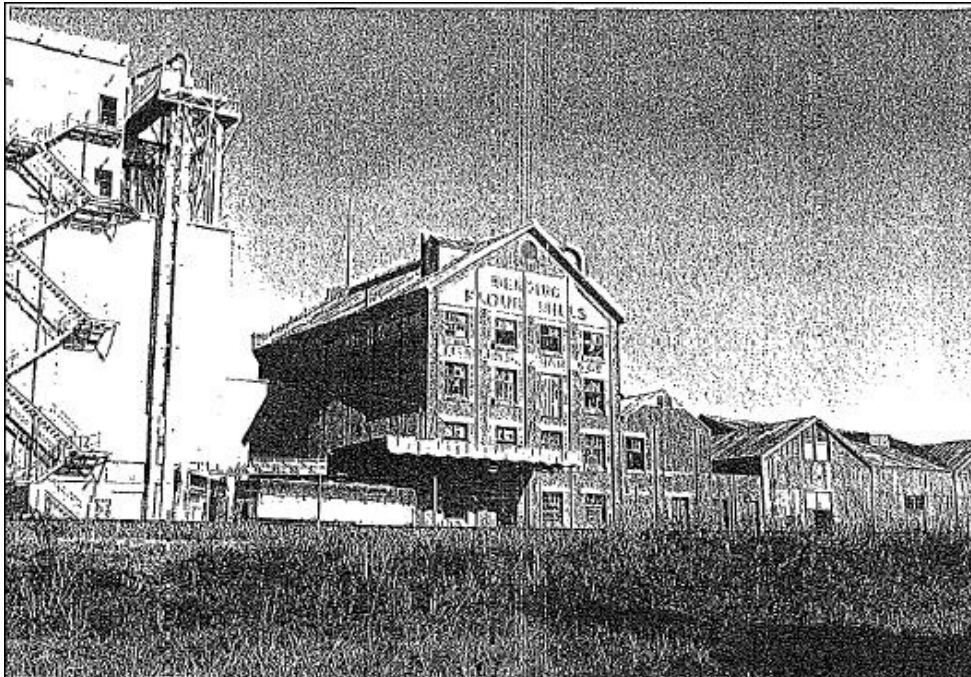
Miscellaneous images of the Tomlins, Simmie & Company, Bendigo Flour Mill



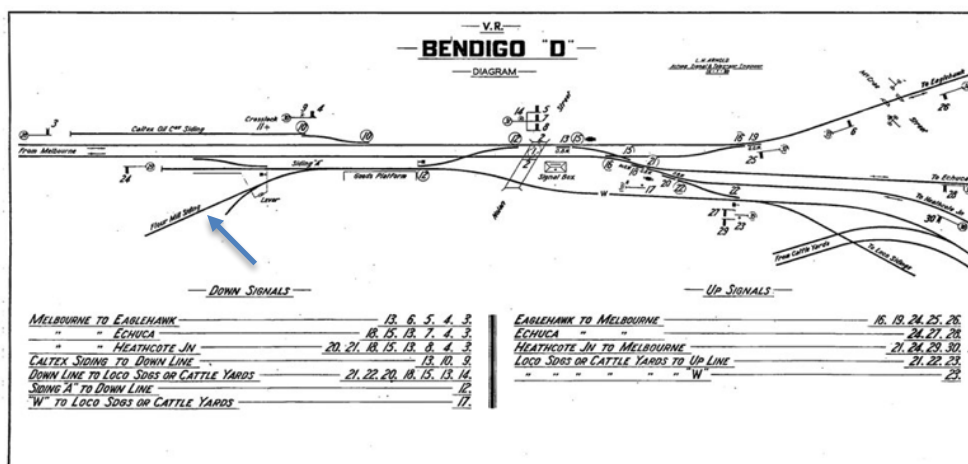
Bendigo Historical Society Inc. Not dated



Looking from railway line 2023. Source of Photograph: Eden Farm Wellness Facebook Page. Photographer not known.



1993 Source of Photograph: National Trust of Australia (Victoria).



Bendigo D Signalbox at North Bendigo, showing the sidings to the flour mill in 1960 (indicated with an arrow). One of these sidings was extended across Lansell Street in 1929. Diagram: David Langley.