

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Name:

Flinders Telegraph Cable Complex and Pier

Address:

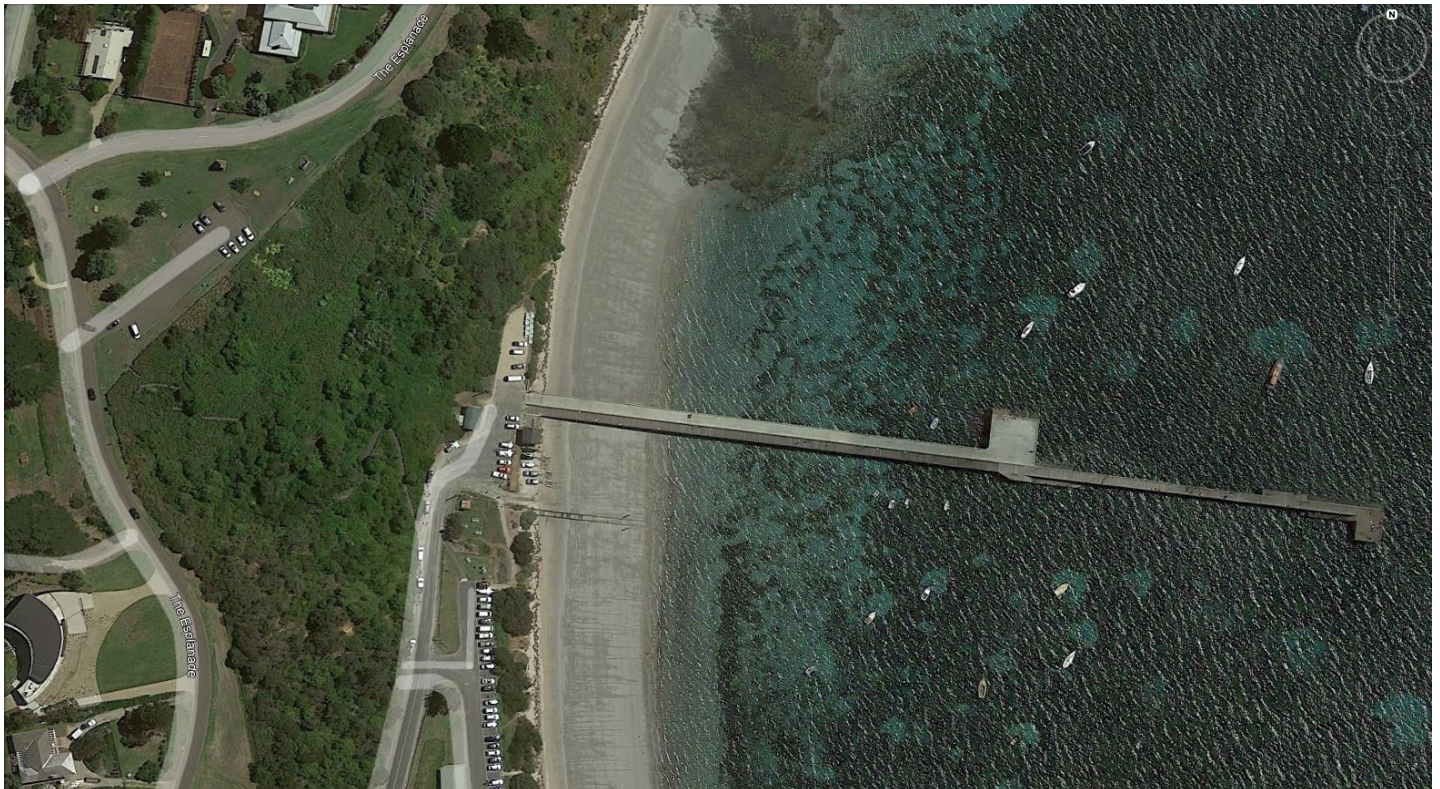
The Esplanade, Flinders

Local Government Authority:

Mornington Peninsula Shire

Provisional VHR No.

PROV VHR H2413



2018, Site from above. Source: Google Earth

Executive Director recommendation

Under Part 3, Division 3 of the *Heritage Act 2017* ('the Act') I recommend to the Heritage Council of Victoria that the Flinders Telegraph Cable Complex and Pier, The Esplanade, Flinders, should be included in the Victorian Heritage Register (VHR) in the categories of registered place, registered object integral to a registered place and registered archaeological place.

A handwritten signature in black ink, appearing to read 'Steven Avery'.

STEVEN AVERY

Executive Director, Heritage Victoria

DATE OF RECOMMENDATION: 16 March 2022



Environment,
Land, Water
and Planning

OFFICIAL



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Executive Director recommendation to the Heritage Council of Victoria

The Executive Director, Heritage Victoria ('Executive Director'), recommends that the Heritage Council include the Flinders Telegraph Cable Complex and Pier at The Esplanade, Flinders in the VHR in accordance with section 49 of the Act by determining:

- That the Flinders Telegraph Cable Complex and Pier is of State-level cultural heritage significance and should be included in the VHR in the category of registered place, registered object integral to a registered place and registered archaeological place in accordance with section 49(1)(a) of the Act.
- That the objects are integral to understanding the cultural heritage significance of the place under section 49(1)(e) of the Act
- That the proposed categories of works or activities which may be carried out in relation to the Flinders Telegraph Cable Complex and Pier for which a permit under the Act is not required will not harm the cultural heritage significance of the place under section 49(3) of the Act.

Site Visit Statement 2021-22

Coronavirus restrictions have impacted on the capacity of Heritage Victoria assessors to undertake site inspections. In this instance, the assessor undertook site visits on 22 December 2021 and 22 February 2022. A member of Heritage Victoria's archaeology team undertook a site inspection on 20 January 2022. Coronavirus restrictions have impacted on the capacity of Heritage Victoria assessors to undertake research in libraries or to access material held in the National Archives offices in other states. No underwater assessment was done.



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The process from here

1. The Heritage Council publishes the Executive Director's recommendation (section 41).

The Heritage Council will publish the Executive Director's recommendation on its website for a period of 60 days.

2. Making a submission to the Heritage Council (sections 44 and 45)

Within the 60 day publication period, any person or body with a real and substantial interest in the place or object can make a submission to the Heritage Council. This submission can support the recommendation, or object to the recommendation and a hearing can be requested in relation to the submission. Information about making a submission and submission forms are available on the Heritage Council of Victoria's website:

<https://heritagecouncil.vic.gov.au/registrations-reviews/executive-director-recommendations/>

3. Heritage Council determination (sections 46 and 49)

The Heritage Council is an independent statutory body. It is responsible for making the final determination to include or not include the place or object in the VHR, or amend a place or object already in the VHR.

If no submissions are received the Heritage Council must make a determination within 40 days of the publication closing date.

If submissions are received, the Heritage Council may decide to hold a hearing in relation to the submission. If a hearing does take place, the Heritage Council must make a determination within 90 days after the completion of the hearing.

4. Obligations of owners of places and objects (sections 42 and 43)

The owner of a place or object which is the subject of a recommendation to the Heritage Council has certain obligations under the *Heritage Act 2017*. These relate to advising the Executive Director in writing of any works or activities that are being carried out, proposed or planned for the place or object.

The owner also has an obligation to provide a copy of this statement of recommendation to any potential purchasers of the place or object before entering into a contract.

5. Further information

The relevant sections of the Act are provided at Appendix 1.

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Description

The following is a description of the Flinders Telegraph Cable Complex and Pier at the time of the site inspections by Heritage Victoria staff in December 2021 and January / February 2022. It consists of four main areas.

1. The reserve at the top of the cliff which was the site of the former cable station.
2. The area half way up the cliff which was the site of Happy Valley - the former cable station staff residences and workshops.
3. The foreshore which was the site of cable and fishing and recreation infrastructure including sheds.
4. The pier and part of Kennon Cove.

Objects integral to the registered place are also proposed for inclusion.

1. Reserve

The reserve is a triangular mown grass area bordered by The Esplanade on two sides, and with a bitumen carpark and mesh fence at the front on the eastern side. This gives a good view across Kennon Cove.

The stone footings of the former cable station are visible in a number of places across the reserve. Some older plantings on the site may date from its use as a cable station. These include a Norfolk Island Pine, a Norfolk Island Hibiscus and what appears to be a Cordyline (possibly *Cordyline australis*). Other Norfolk Island Pine specimens appear to be more recent.

The reserve also contains three memorials on the northern side:

- *George Bass & Matthew Flinders Monument*. This is a squat bluestone and cement pyramid with a marble plaque on the north west side and a modern cast bronze plaque on the south east side.
- *Flinders War Memorial*. This is constructed as a double-sided stone seat with a convex top rail. The facings and seats are made from Harcourt granite surrounded by large smooth, evenly sized, waterworn stones collected locally by the community. The steps are bluestone surrounded by concrete. There is a historic cast copper plaque on the west side and a modern plaque on the east side.
- *Flinders & District World War Two Memorial*. This 2017 memorial is also made in the shape of a seat but is only half the size of the Flinders War Memorial and does not have any seats. It is made of granite and bluestone.

2. Happy Valley area

This location is halfway up the cliff and is reached by a path with a timber deck and handrails installed in the 1990s. The area is heavily overgrown. Areas of relatively flat ground or terracing are visible in parts of the slopes of the former Happy Valley area. In one part of the site, the alignment of what may have been the former path up the slope is discernible.

3. Foreshore

There are five small sheds on the foreshore:

- Former Jetty Cargo Shed (VHR H0906). Described in its registration documentation.
- Fishing shed. This shed is painted cream on the outside with green doors and trim, and a green corrugated steel roof. Some weatherboards on the inside are painted with a pink wash and others are unpainted. The timber doors on three sides, two of which are sliding, appear to be original. Its plinth is made from concrete with a stone facing in a 'crazy' pattern. The shed appears to have been moved to its current site from another

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location. On top of the new plinth is a narrow beam of coarse concrete. The external bottom timber member of the shed has been placed over this.

- Winch shed and boat ramp. The walls of this shed are modern concrete bricks. The visible floor also appears modern, but the concrete plinth underneath appears to be older and may be the remains of one of the cable test houses.
- Cable memorial. This is a large rock with a bronze plaque installed to the south of the Winch Shed. It commemorates the laying of the 1869 telegraph cable and was dedicated in 1993. There is a timber picnic table and benches nearby.
- Sea Pilot shed – A small, modern steel shed on a modern concrete plinth located behind the Cargo Shed

Bitumen car parks and drains, seats and picnic benches are present. One of the picnic bench sets has a plaque commemorating the Pioneers of Commercial Fishing. There is a channel between the boat ramp and the fishing shed used for launching boats.

4. Pier and part of Kennon Cove

Flinders Pier is approximately 325m long and 3.6m wide. The longer timber section contains four lower landings and a jetty head at the end, perpendicular to the pier. A concrete section is attached to the landward section of the north side of the timber pier. This is approximately 190m long and 4.5m wide. Vehicles can travel on the concrete section, and it contains a turning bay and lower landing. Tubular steel handrails and ladders are also present.

The pier materials are timber, steel and concrete. The piles and crossheads are made from hardwood timber or painted steel. The timber section of the pier has a timber deck and beams. The steel piles carry a cast concrete deck.

The pier extends into Kennon Cove which is a shallow sandy bay which gradually deepens. There appears to be a number of permanent boat moorings attached to the seafloor around the pier.

Flinders Pier is located within extensive undersea seagrass meadows that are home to large colonies of the Common or Weedy seadragon (*Phyllopteryx taeniolatus*). The dominant seagrass species in the Kennon Cove area is *Amphibolis antarctica* or Sea nymph. A recent study noted that seadragons generally live in and around *A. antarctica* seagrass rather than in the other seagrass species present¹ Seadragons are also found under the pier where little seagrass grows (due to lack of light) and in other areas. The generally calm waters of Kennon Cove are a suitable seadragon habitat because they are easily washed away by strong currents.

5. Objects integral

These objects include fragments of submarine cable excavated from Kennon Cove and other artefacts relating to the Former Jetty Cargo Shed (VHR H0906), cable station and residences. All are on display in the cargo shed on the foreshore.

There are three objects in the fishing shed which are not considered to be objects integral to the place.

- A timber trolley with hard rubber wheels made by *Perrot and Adams*. This could not have been used on the historic tramway formerly on the pier because it does not have flanged wheels and appears smaller than the tramway trolleys in historic images.
- Two cast iron items used to support canoes which appear to be parts of a slipway pulley system

¹ (Consulting Environmental Engineers, 2021)

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2021, Flinders Pier, fishing shed, cargo shed and edge of boat ramp



2021, New path from reserve to foreshore and pier through *Happy Valley* area



2022, Pier, picnic tables and cable memorial stone



2022, Concrete section of pier and platform



2022, Roof of cargo shed, fishing and winch sheds and boat ramp



2022, Bass and Flinders Memorial

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2022, Historic plantings on former Cable Station site, Norfolk Island Hibiscus, Norfolk Island Pine and *Cordyline* to the right.



2021, Incised pile numbering



2022, Jetty Head



2022, Engrance to pier

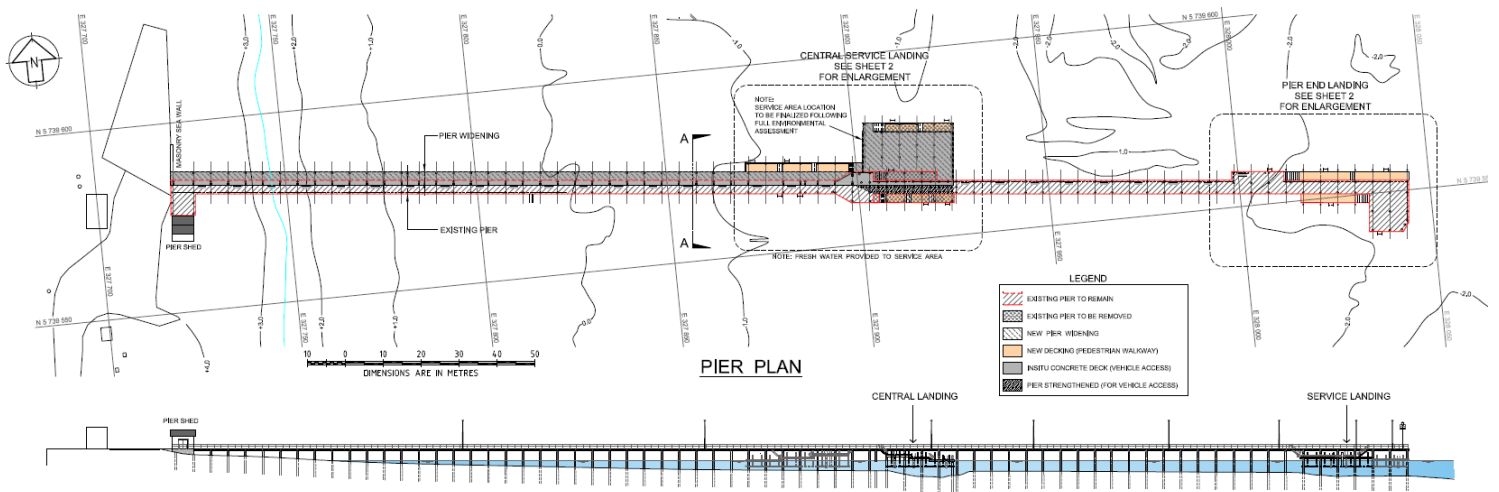


2022, Pier, south side



2022, Flinders War Memorial (left) and World War II memorial

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History

Flinders Pier

The Flinders Pier was constructed in 1864 to transport cargo between Flinders and Melbourne and for boat mooring and fishing. Until the construction of more roads, it was the main means of transport between Flinders and Melbourne and has been used for recreational and commercial boating and fishing throughout its life. It was also used to bring staff, materials and equipment to the Telegraph Cable Station. When the first telegraph cable was installed, Kennon Cove was considered to be an ideal location for a submarine cable because it was sheltered and shallow with a sandy and gently sloping sea bed².

Many small sheds not related to the cable station have been constructed and removed from the site from 1864, including the cargo shed (VHR H0906) which was constructed in ca.1871. For many years there was a goods/refreshments shed at the landward end of the pier. More than one building appears to have performed this role. Fishermen's houses and sheds were also constructed all along the foreshore at various times.

The fishermen's permissive occupancies were progressively cancelled following the 1931 reservation for public purposes of the foreshore land between Dudley Street and the Flinders Pier. They were all gone by 1949. During World War II, the remaining structures were removed from the beach and pier area. The entrance to the pier was sandbagged and barbed wire was spread along the beach. After the war, the cargo shed was installed in its current position and the fishing shed (which may be the former 1913 goods and refreshments shed) was installed on the south side of the pier. A light was installed at the end of the pier to keep ships away from the cable.

Telegraphic communication in Victoria

Telegrams sent by morse code revolutionised communications in the nineteenth century. The first telegraphic line in Victoria was installed in Melbourne in 1854. Telegraph lines spread throughout the state and in 1858 Melbourne was connected to Adelaide and Sydney³. Submarine telegraphy was needed to communicate with other countries but was more difficult technologically and the first overseas telegram was not received in Melbourne until 1872.

² ('Our Special Reporter', 1869)

³ (May, 2008)



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Although internationally the first submarine cables began to be laid from 1845, many early cables failed due to abrasion on rocks, being caught by fishermen or accidental cutting of cables by passing ships. The first successful transatlantic cable was laid in 1866. At this time there was an explosive growth of cable communications all over the world with ca.640 cables laid between 1860 and 1900 and another ca.520 laid between 1901 and 1950.

In the present day, submarine cables (now largely fibreoptic) carry more than 99 per cent of international data traffic (satellite accounts for less than one per cent). There are currently three submarine cables between Tasmania and Victoria with Victorian landing points at Sandy Point, McGaurans Beach and Yanakie. A new cable is proposed and will land at Venus Bay. It appears that Victoria's eastern coast is still the best place to install telecommunication cables between Victoria and Tasmania.

Telegraph cable companies

The rapid growth in cable communications all over the world was driven by profitable private companies led by enterprising individuals. Monopoly agreements were often negotiated with governments by these companies and governments paid subsidies to the companies to lay and operate cables.

The Telegraph Construction & Maintenance Company (TC&MC) was formed in the UK in April 1864 and laid cables all over the world⁴. The British Australian Telegraph Company (BATCo) operated many cables in Australia. In 1873 BATCo amalgamated with the British Indian Extension Telegraph Company Limited and the China Submarine Telegraph Company Limited to form the Eastern Extension Australasia and China Telegraph Company Limited (EEA&TCo). TC&MC and EEA&TCo were linked by UK entrepreneur and *Cable King* John Pender who was a major investor in TC&MC and a director of EEA&TCo⁵.

Flinders cable installation

The first submarine cable connecting Tasmania to mainland Australia was installed in 1859 between Low Head in Tasmania and Cape Otway Lightstation (VHR H1222), via King Island. It was abandoned after less than two years due to frequent cable breakages. The Victorian and Tasmanian governments continued to work towards creating a submarine cable link between the two states, and in 1867 they contracted the TC&MC to install a new cable.

In 1869, the TC&MC⁶ ship *SS Investigator* assisted by the Navy Ship *Pharos* laid a submarine cable from Low Head in Tasmania to Flinders. The installers faced and overcame many difficulties while laying the cable. Around two hundred miles (322 km) of cable were laid between Tasmania and Flinders. The last 12 miles (19 km) of cable at each shore end were more heavily armoured. The whole cable weighed 498 tons (453 tonnes). The cable was laid directly on the ocean floor. When it reached shallower water, deep trenches were dug in the sand to protect it from passing ships. Subsequently, concrete lined tunnels were used to bring the cable to the surface. The successful installation of the 1869 cable was greeted by a flurry of celebratory telegrams between the mayors of all Australian capital cities⁷.

The cable was armoured to prevent breakage by being wrapped in layers of wire and was insulated with gutta-percha. This is a natural polymer somewhat similar to latex rubber but more rigid. Later technology included heavier armouring and innovations to strengthen the signal, but gutta-percha continued to be used to insulate submarine cables until it was replaced with polyethylene in the 1940s.

TC&MC is most likely to have laid the next two cables at Flinders in 1885 and 1898 because they laid all the cables for EEA&TC. In 1909 Siemens Brothers of London was contracted by the Commonwealth Post Master General to lay two cables⁸. These were known as the east and west cables and allowed cable traffic to move in two directions

⁴ (Thompson, 2008)

⁵ (Burns, 2022)

⁶ (Brangan, c1987)

⁷ ('Our Special Reporter', 1869)

⁸ (Fagan, 2002)

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for the first time. All the cables appear to have been laid on the south side of the pier because historic images show cable test houses in this location; but this has not been confirmed.

Cable operations

The first Flinders cable station appears to have been initially operated by the Victorian Postmaster General because advertisements in the Government Gazette refer to works to the cable station⁹. It was known as the *Post and Telegraph Office*. It appears that EEA&TCo took over the cable station operation in 1891 and moved the telegraph cable operations to its new building located on the northern side of Flinders. It continued to operate the cable station until 1909 when the Commonwealth Postmaster General took it over.

Meanwhile BATCo appears to have purchased the 1869 cable itself from TC&MC perhaps around 1871 (when TC&MC's cable ship was sold to BATCo). In 1873 BATCo sold the Tasmanian Submarine Telegraph Cable to EEA&TCo for £70,000 in shares. Contemporary newspaper reports expressed the hope that the new company's charges would be lower. It appears that the 1885 and 1898 cables were also owned by EEA&TCo. The 1909 cable appears to have been owned and operated by the Commonwealth Postmaster General.

In 1914 two German cruisers *SMS Nürnberg* and *SMS Titania* attacked EEA&TC's central Pacific telegraph cable relay station on Fanning Island in the Pacific. Later that year *SMS Emden* attacked EEA&TC's telegraph station in the Cocos Islands. Because of the strategic importance of cable communications and the dangers cable infrastructure faced during World War I, the pier and beach at Flinders were guarded by soldiers camped near the site of the present Flinders Golf Club.

The telegraph cable at Flinders appears to have operated until the late 1930s or early 1940s when the submarine telephone and telegraph cable installed at Apollo Bay in 1936 began operations. In 1943, the two 1909 cables were excavated and taken to New Guinea to provide war-time communications. Soldiers continued to guard the site even after removal of the cables in order to mislead any enemy surveillance¹⁰.

Flinders Submarine Telegraph Complex buildings

Different types of infrastructure are commonly associated with cable stations. All of these were installed or constructed at Flinders at some point during its operational history:

- Armoured submarine and land-based telegraph cables.
- *Cable hut* on the beach. This is where the submarine cable landed and where messages were transcribed. They were replaced by test houses as the cable signals became more powerful.
- *Test house* on the foreshore. A test house is where the submarine cable landed and was joined to the land-based telegraph cable. In the test house the two cables can be disconnected, and each tested separately in order to identify if a problem was in the submarine or land section of the cable. Portable instruments were used in earlier test houses, and later test houses had instruments installed on the walls. In Queensland in 1901, test houses installed for the Pacific Cable were prefabricated in the UK. It has not been possible to determine if this was the case at Flinders.
- *Repeater stations* to amplify signals
- *Cable stations* where the morse code was received from the test house. These were generally substantial buildings with specialised equipment and rooms. They often provided postal services as well and were typically known as a *Post and Telegraph Office*. Messages transmitted via the submarine cable for local residents were transcribed and sent to the recipients as telegrams, typically delivered by boys on bikes. Messages for other destinations were amplified and re-transmitted to the next cable station.

⁹ (Vines, 2013) p17

¹⁰ (Brangan, c1987)



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- Residences and workshops. Telegraph cable and its associated equipment was not reliable and frequent repairs were needed, much of which was done on site.
- Plantings from gardens associated with the cable station and residences
- Paths, fences and telegraph poles.

Between 1869 and ca.1940s, three different buildings operated as cable stations, each in a different part of Flinders. It appears that after being amplified at the cable station, the messages were transmitted along Cook Street to the cable station at Cape Schank and onto Melbourne and from there to the rest of Australia and the world.

First cable station 1869 - 1891.

A rendered masonry building at the top of the cliff where the memorials are located. In 1891 it was sold and converted to a guest house called *Houghton House*. Later it was used as tea rooms. It was demolished by the Commonwealth Postmaster-General's Department (PMG) in the early 1960s.

Second cable station 1891 - 1909.

A large, elaborate, timber building designed by Harold Desbrowe-Annear located on the corner of Wood Street and Cove Lane. This was constructed for EEA&TCo. After 1909 it operated as *Flinders Guest House*. This burnt down in the early 1960s and its location is outside the proposed extent of registration.

Post and Telegraph Office 1909 - ca.1940s.

After federation the PMG took over the telegraph operations and appears to have moved the cable receiving and transmission equipment and functions to what became the Post and Telegraph Office on Cook Street, Flinders. A timber post office is still in existence on Cook Street in 2022 and its location is outside the proposed extent of registration.

Cable huts and test houses

The first cable hut constructed at Flinders was a small cable hut. At least two test houses were present at Flinders later, probably installed to accommodate the later cables (installed in 1885, 1898 and 1909). It is not known if the Flinders test houses had instruments installed on the walls or if portable instruments were used. The last test house installed (perhaps in 1909) is visible in pre-World War II images. It appears to have been removed with all the other structures during the clearance of the beach during World War II. Its fate is unknown.

Initially the signal received in the Flinders test house was so weak, it had to be transcribed in the cable hut and carried up the steep cliff to the cable station at the top of the hill where it was re-coded for transmission to Cape Schanck. Later, the signal was stronger and could travel along the land cable to the cable station. It is not known if the land telegraph cable at Flinders was carried on telegraph poles or installed underground.

In 1891 EEA&TCo constructed a repeater station on the beach, probably to provide a stronger signal to its new, larger cable station on the corner of Wood Street and Cove Lane. This may have been located to the north of the pier.

Monuments

There are three monuments located at the western end of the cable station site at the top of the cliff.

1. George Bass & Matthew Flinders Monument

This monument commemorates George Bass and Matthew Flinders for their exploration of Western Port, Bass Strait and Tasmania and was unveiled in 1912 by Governor Sir John Fuller. It was erected by the people of Flinders, assisted by the National Parks Association. The marble plaque commemorates Bass and Flinders, and the modern plaque commemorates a 1998 re-enactment of their journey.

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2. Flinders War Memorial

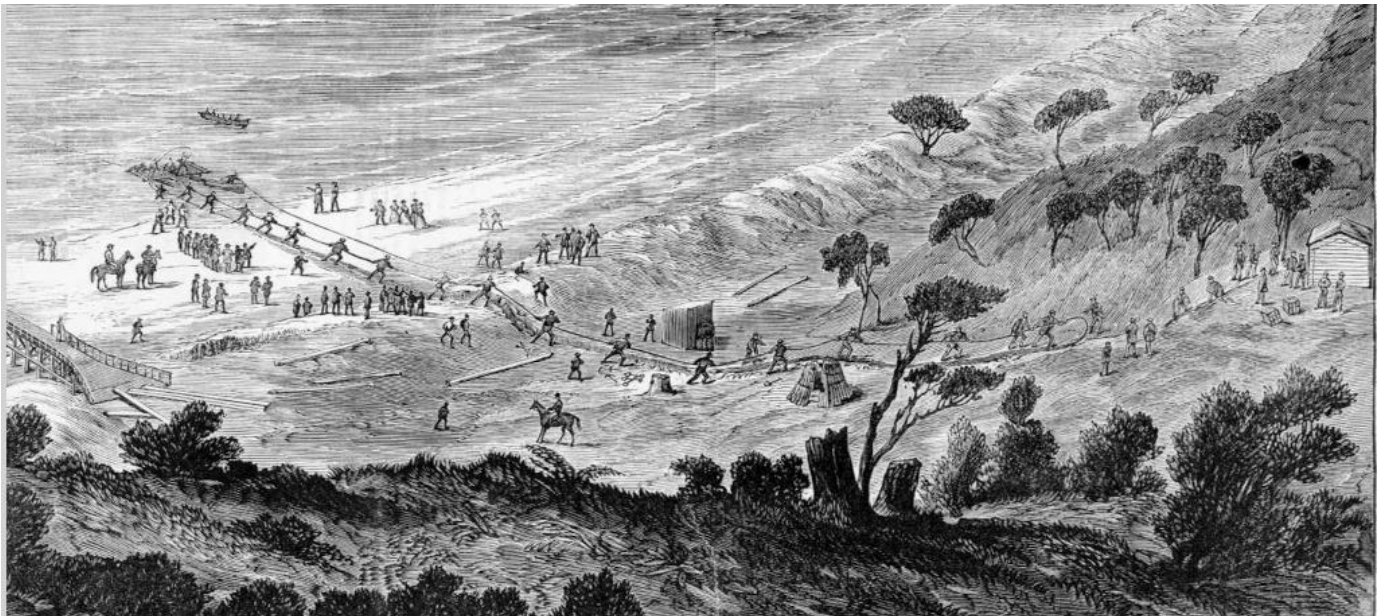
This fine memorial was built in 1922 to commemorate those from the area who served in World War I. The names of those who served are listed on a cast bronze plaque on the west side and a more modern plaque outlining the history of the war was installed on the east side by the Australian Government's *Your Community Heritage* Program.

The memorial was designed by noted Melbourne architect Christopher Alfred Cowper (1868-1954). He did not charge for the work, and it took place after he had largely moved from architectural design to real estate. The Encyclopedia of Australian Architecture states that Cowper's *domestic work exhibits great refinement in detail and composition. His highly individual handling of joints and bracket details is especially skilful, and adds not only visual interest to the houses, but also imparts a craft-like quality to his architecture*¹¹. This is also the case for this memorial.

3. Flinders & District World War Two Memorial

This memorial was dedicated in 2017 and holds the World War II plaque originally installed on the World War I memorial. It is smaller than the Flinders War Memorial but appears to have been thoughtfully designed to be sympathetic to it by being the same shape (without seats) and being made of similar materials.

There is a memorial to the cable station on the foreshore close to the location of one of the cable landing sites.



1869, Section from engraving *Laying of the Victorian end of the Tasmanian Cable*. Showing the cable landing and the simple cable hut on the far right. Published in *Illustrated Australian News for Home Readers*, 22 May 1869.

Source: State Library of Victoria

¹¹ (Logan, 2012)

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ca. 1873-ca. 1882, Cargo shed (VHR H0906) constructed ca.1871 at the end of the pier showing tram track and what may be the first cable hut on the left and the *Happy Valley* staff quarters and workshops above. Source: State Library of Victoria



1890-1910, Cable Station complex and pier from the water. Cable station at the top of the cliff and *Happy Valley* half way down. Buildings on the beach include (from the left) what may be the second cable test house, cargo shed (VHR H0906) and what may be the white 1891 repeater station to the right of the pier. Source: Flinders District Historical Society. VFHS 2678



Pre-1913, Pier, Cargo Shed (VHR H0906), first refreshments shed, tramway on the pier and cargo trolley. Source: John Brock, private collection

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Post 1913, Pier, Cargo Shed (VHR H0906), second goods/ refreshments shed, tramway on the pier and roof of staff residence/workshop. Source: Allen Boyd, private collection



ca. 1910-1920, Cable landing site showing what are likely to be the second and third cable test houses and *Happy Valley* residences on the right. Source: State Library of Victoria ¹²



Date unknown, Post and Telegraph Office and Cable Station from Cook Street, Norfolk Island Pine on right. Source: Allen Boyd, private collection

¹² <http://handle.slv.vic.gov.au/10381/4178091>

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2022, Interior, west wall of fishing shed showing sliding doors and early, pink interior finish.



1900, Flinders Pier . Tram track, cargo trolley, timber railing.
Source: Flinders District Historical Society VFHS 341.2

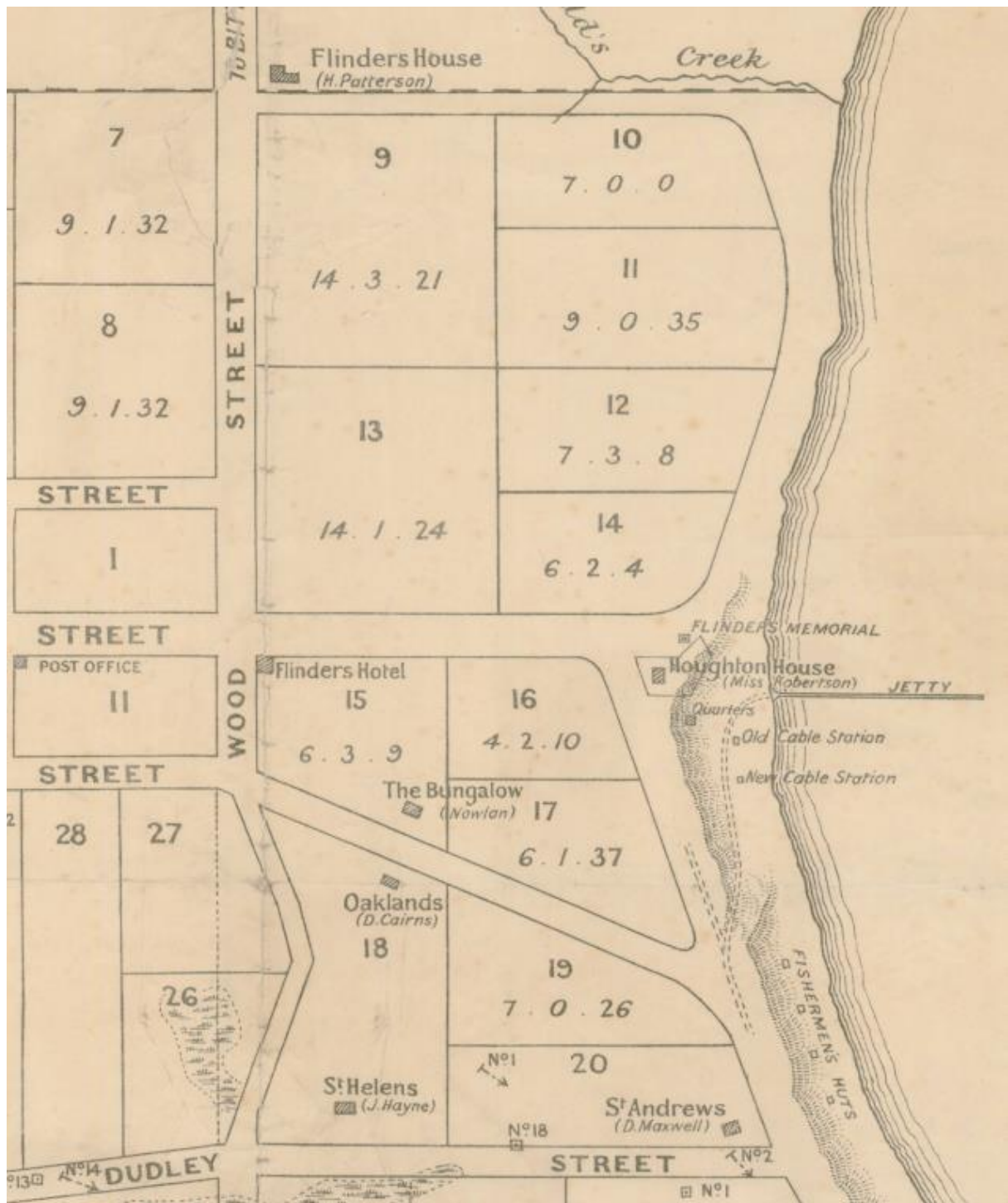


Ca.1940s, Flinders Pier showing construction of boatramp and foreshore cleared of sheds and fishermens' huts. The cargo shed and perhaps the roof of the fishing shed are visible on the right. Source: State Library of Victoria



1891, Detail *Mornington Peninsula – Flinders*, Department of Crown Lands and Survey. Showing the telegraph line to Cape Schank along Cook Street, telegraph station, pier and the cable warning light. Source: PROV

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1914, Detail, *Tourist Map of Flinders*, Department of Crown Lands and Survey. Showing the first cable station (Houghton House), the second cable station (Flinders House) and the third cable station on Cook Street (Post Office). The second and third cable test houses are incorrectly named 'Old Cable Station' and 'New Cable Station'. The Fishermen's Huts are also visible. Source: State Library of Victoria

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Flinders Telegraph Cable Complex and Pier in 2022 (evidence of social value)

A. Existence of a community

A community made up of both professional scientists and amateur enthusiasts has developed a common interest in viewing Victoria's popular marine emblem, the Common or Weedy seadragon at and around Flinders Pier. The community who values Flinders Pier for its access to wild seadragons includes marine biologists and other scientists and scientific communicators, recreational snorkelers and scuba divers; video makers; professional and amateur photographers; documentary makers, members of the public who consume the media produced by those with access to the dragons and people who live or holiday on the Mornington Peninsula. Members of this community come to Flinders from all over Australia and the world, and many come from across Victoria. There is evidence of the community in the substantial amount of research, photography, advertising, and social media and mainstream media produced by the community.

B. Attachment to Flinders Pier

Flinders Pier is considered to be the best place in Victoria for this community to study and view seadragons in the wild. This is because many members of the community are able to experience the seadragons using scuba or snorkelling equipment, the waters of Kennon Cove are calm (the seadragons are not strong swimmers); and the pier is close to both Melbourne and the seagrass beds.

While the seadragons can be seen from other piers and reefs in Western Port and Port Phillip Bay, numbers are often lower than at Flinders.

The community share an interest and appreciation of seadragons, and many are committed to the protection of the species and its environment.

Examples of the scientific community's attachment to the study of seadragons at Flinders pier include:

- Scientists' use the pier to undertake research. Several recent studies have used Flinders pier for studying the seadragons.
- The 2016 *State of the Bays* study of the environmental health of Port Phillip and Western Port contained many photographs taken at Flinders Pier¹³ including an image of a seadragon.
- Sir David Attenborough and film makers from the US, France and Japan have made documentaries at Flinders Pier about seadragons.
- Popular citizen science programs *Dragon Quest* and *Seadragon Search* are fostering active public interest in the seadragons to better understand their biology.

Professional aquariums all over the world including the Melbourne Aquarium want to display seadragons because they are popular with the public. These aquariums are supplied from Flinders¹⁴. Examples of the remainder of the community's attachment to the seadragons at Flinders Pier include:

- Many Victorian professional and amateur underwater photographers publish or post images of seadragons at Flinders Pier¹⁵. For example, Pang Quong's YouTube channel (which includes seadragons as well as other marine creatures filmed at Flinders Pier) has 17.8 thousand subscribers.
- Victorian scuba dive tour operators advertise Flinders Pier as the best place to see the seadragons.¹⁶
- The movement to retain the timber fabric of the pier has become entwined with the conservation of the seadragon. Over 40,000 people have signed a Change.org petition to *Save Flinders Pier* and Sir David

¹³ Finn, Julian, Museums Victoria personal communication

¹⁴ One pregnant male is collected per year under permit. He is returned to the wild when his eggs have hatched.

¹⁵ <https://www.instagram.com/p/CZGxcg7PFQA/>

¹⁶ <https://www.scubadoctor.com.au/weedy-seadragons-melbourne.htm>

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Attenborough has sent a letter of support. Articles have appeared in local and state print, TV and online media.

C. Time depth to the community's attachment to Flinders Pier

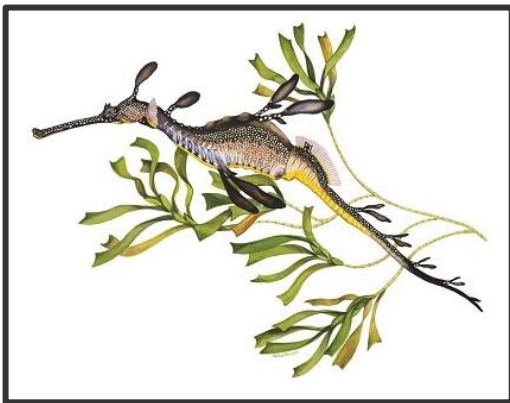
Scientists have studied seadragons for a long period, with the first specimen described in 1804¹⁷. Visits by scientists and the public to view seadragons at Flinders Pier by diving or snorkelling began at least in the 1970s¹⁸ with an oral history report of people snorkelling to view the seadragons from the late 1950s¹⁹. This appears to have accelerated from the 1980s paralleling the increasing availability of scuba and snorkelling equipment.

D. Resonance of social value

While the most recent examples of attachment to the pier as a response to proposed change would not be evidence of social value if it was confined to the local area, the concern appears to have resonated far beyond Flinders as indicated by the petition and press coverage. The social values of Flinders Pier as a place to study and view seadragons resonates across the state. This is demonstrated by all the examples of community attachment, most of which exert an influence across the broader Victorian community beyond Flinders. The seadragon is a potent and popular symbol of marine conservation and is Victoria's marine emblem and is widely associated with Flinders Pier. This is evidenced by mainstream and social media coverage. The social value speaks to stories of marine and environmental conservation and appreciation of Victoria's natural wonders that contribute to the State's identity.



Undated, Male seadragon with eggs
photographed at Flinders Pier
Source: *Ocean*, Smithsonian Institution



2022, *State Marine Animal: The Common Seadragon*.
Source: Victoria's State Emblems

¹⁷ <https://www.biodiversitylibrary.org/page/14763544#page/239/mode/1up>

¹⁸ (Consulting Environmental Engineers, 2021) p.14

¹⁹ (Grant, 2021 - 2022)

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Save Flinders Pier Special Sale



Date unknown, Fundraising for a community campaign to save Flinders pier using the seadragon.
Source: TryBooking



2020, Victorian National Parks Association staff member leading a citizen science program.
Source: Kris O'Keeffe Photography©



2012, Three seadragons swimming below Flinders Pier.
Source: Pang Quong, YouTube²⁰

²⁰ <https://youtu.be/O8EnZhFAxqk>

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Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Further information

Relevant Authority	Shire of Mornington Peninsula
Heritage Overlay	Mornington Peninsula Planning Scheme: <ul style="list-style-type: none">• HO330 Flinders Foreshore Precinct, Flinders• HO46 Cable Station Site Cook Street/The Esplanade, Flinders• HO81 Former Jetty Cargo Shed, Flinders Foreshore, Flinders
Other Overlays	Environmental Significance Overlay ESO20 Significant Landscape Overlay SLO2, SLO4 and SLO6 Erosion Management Overlay Land Subject to Inundation Overlay
Other Listings	VHR H0906 Former Jetty Cargo Shed H7921-0108 Flinders Pier And Slipways Precinct H7921-0073 Flinders Cable Station Site National Trust B6332 Flinders Fishermen's Shed (VHR H0906)
Other Names	Flinders Pier, Foreshore & Cable Station Precinct Cable Station Site, Cook St, Flinders Flinders Jetty & Sheds Flinders Cable Station Precinct Flinders Cable Station Site Flinders War Memorial Flinders-Somers Coastal Reserve Flinders Foreshore Fishermen's huts
Date of construction/creation	1864-1909
Architect//Builder/Designer/Maker	H Turnbull & Co constructed the pier The 1869 and 1885 cables were laid by the Telegraph Construction and Maintenance Company The 1909 cable was laid by Siemens Brothers and Company of London The builders and architects for the various buildings are not known

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Traditional Owner Information

The Flinders Telegraph Cable Complex and Pier is located on the traditional land of the Bunurong people of the South-Eastern Kulin Nation. Under the *Aboriginal Heritage Act 2006*, the Registered Aboriginal Party for this land is the Bunurong Land Council Aboriginal Corporation.

Victorian Aboriginal Heritage Register

The land, beach and ocean areas of the site, the pier and the now demolished pier breakwater are within areas of Aboriginal Cultural Sensitivity. There may also be places on the Victorian Aboriginal Heritage Register within the extent of registration.

Diagram showing the current VHR and VHI places in the nominated area



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Integrity

The integrity of the Flinders Telegraph Cable Complex is good in terms of its potential for archaeology. The cultural heritage values of the Flinders telegraph cable infrastructure are present but cannot be easily read because they are underground. Archaeological investigations of the subsurface extant fabric would enable the cultural heritage values of the Flinders Telegraph Cable Complex to be read. These include:

- The first Flinders cable station with some original plantings likely remaining on the site
- Cable staff residences and workshops
- One cable hut
- Two cable test houses
- One repeater station
- Cables and cable trenches buried on land under the sea bed
- Buried archaeological artefacts relating to the cable laying and operation
- Paths, fences, and telegraph poles associated with the telegraph operations

The integrity of the Flinders Pier is good in terms of its general form, materials and orientation. The cultural heritage values of the place can be read in the extant fabric. The telegraph cables were always buried, and the buildings were frequently moved or replaced; however, from the pier, the view of Kennon Cove comprising a wide, shallow sandy bay with a long pier remains as it was during the operations of the cable station. An early cargo shed (VHR H0906) and a later fishing shed are still present. The objects integral are on display in the cargo shed which allows their cultural heritage values to be read.

The cultural heritage values of the place as a site to study and view seadragons can be read in online and print media. The extant fabric of the pier also allows this cultural heritage value to be read.

The origins of the fishing shed are unclear. It may be a former test house, but it does not display any evidence of having instruments attached to its inner walls and appears to have slightly different dimensions to the test houses. It is more likely to be a goods shed which was constructed in 1913 and was later used as a kiosk by the matriarch of a well-known fishing family. (March 2022)

Intactness

Archaeological site

The intactness of the whole place as an archaeological site is very good. The stranding structures from the cable station complex and the various historical uses of the pier have all been demolished but it is likely that extensive historical archaeological remains and associated deposits survive.

The former cable station was demolished in 1961. At the site, some of the features are currently exposed, other are located just below the grass surface level and are easily uncovered with surface scraping by trowel. It is likely that extensive remains of the building's stone footings/foundation have survived directly beneath the current surface level. There is some potential for occupation deposits associated with the use and abandonment/destruction of the building complex to also survive across parts of the site.

The former staff residences and workshops (*Happy Valley*) may also have been demolished in the 1960s with some remnant fruit trees perhaps being removed in 1985. The area is heavily overgrown, and surface visibility is poor. However, in places where some surface and subsurface visibility was possible, high numbers of archaeological artefacts/objects were identified including handmade bricks which are likely to predate c.1880. In addition to the scatters of artefacts, areas of relatively flat ground or terracing were visible in parts of the slopes of the former *Happy*



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Valley area, which are likely to have been the locations of former buildings or properties. In one part of the site, the alignment of what may have been the former path up the slope was discernible.

It appears that the last of the former cable test houses were removed around the end of World War II with early cable related structures, sheds associated with the pier and fishermen's huts being removed earlier, at different times. The condition of the foreshore site was not conducive to the identification of remnant features in this area, and no footings, deposits, artefacts of other significant elements were identified in this part of the site.

There is potential for the archaeological remains to have been damaged by changes to the site, including landslips and road realignment; as well as the creation of an embankment, boat ramp; winch shed and a depression in the beach between the pier and the winch shed, currently used for launching boats

Additions which are less likely to have damaged the archaeological remains include bitumen car parks, seats and picnic tables and a cable station memorial which has been installed near the pier, on top of the embankment, near the site where one of the cables landed.

The Bass and Flinders Memorial (1913), Flinders War Memorial (1922) and World War II (2017) memorials have been installed on the cable station site. These do not appear to be located in the area where the main cable station buildings stood but may cover archaeological remains of smaller buildings or cables including those travelling to the second cable station (outside the extent of registration).

Pier

The intactness of the pier is fair. It remains in its original position and retains its general form and materials. It is recognised that timber structures partially immersed in the ocean require frequent repair to allow them to continue to function. Recurring replacement of components is common. It is very likely that all the timber fabric has been replaced at some time over the life of the pier.

The pier has been altered many times since its construction in 1864, apparently due to changes in the requirements of its users. This includes changes to its length and the construction and later demolition of a breakwater (1955-1998). In 2011 a new concrete pier and platform on painted steel piles was constructed on the landward section of the north side of the pier. This approximately doubled its width at the landward end but not its length and did not change its alignment.

The Cargo Shed (VHR H0906) was originally located next to the south side of the entrance to the pier. After World War II, it was moved a few metres back to the base of the path leading to the first cable station site.

A small shed is now located next to the widened landward entrance to the pier. This shed appears to have been first built and used elsewhere. It resembles the goods shed/ kiosk visible on the north side of the pier in the 1913 image, and may be this shed, relocated away from the north side of the pier entrance during World War II and returned to the south side after World War II.

The intactness of the objects integral as archaeological artefacts is good.

Condition

The condition of the site as an archaeological place is unknown but likely to be very good. (January 2022)

The condition of the timber components of the pier are good to fair with evidence of pest attack and structural damage.

The condition of the concrete and steel components of the pier are good to very good with surface corrosion visible through the paint on some piles. There is some corrosion of smaller steel components such as cross bracing and ladders. There are cracks visible on the concrete deck.

Below water level, marine plants are growing on timber and painted steel piles and other components. It appears that different species grow on each type of pile²¹.

²¹ (Consulting Environmental Engineers, 2021)



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The condition of most of the objects integral is fair. The condition of one of the excavated pieces of cable is poor with extensive and unavoidable corrosion due to long immersion in the sea. Some of the pieces of cable have been cut.

Seadragon viewing site

Google Earth imagery²² shows that the seadragon habitat of seagrass is in good condition²³. Anecdotal evidence suggests that seadragons are still abundant in 2021 and a documentary on seadragons was filmed on the site in 2016²⁴. However, no detailed research has been done on this subject and the most recent report²⁵ notes that, *there have been no quantitative (numerical) surveys of biota including seagrasses, seadragons or other biota at the Flinders Pier that inform comparison of the abundance at different distances or water depths along the pier either before or after the new steel and concrete structure was added to the wooden pier. There is no quantitative data (counts) to compare flora and fauna preferences for the north or south side of the pier and or steel versus wooden piles*. It is also noted that older style boat moorings have removed seagrass in their immediate area.

Note: The condition of a place or object does not influence the assessment of its cultural heritage significance. A place/object/object integral may be in very poor condition and still be of very high cultural heritage significance. Or a place/object/object integral may be in excellent condition but be of low cultural heritage significance.

²² (Consulting Environmental Engineers, 2021)

²³ (Consulting Environmental Engineers, 2021)

²⁴ Attenborough

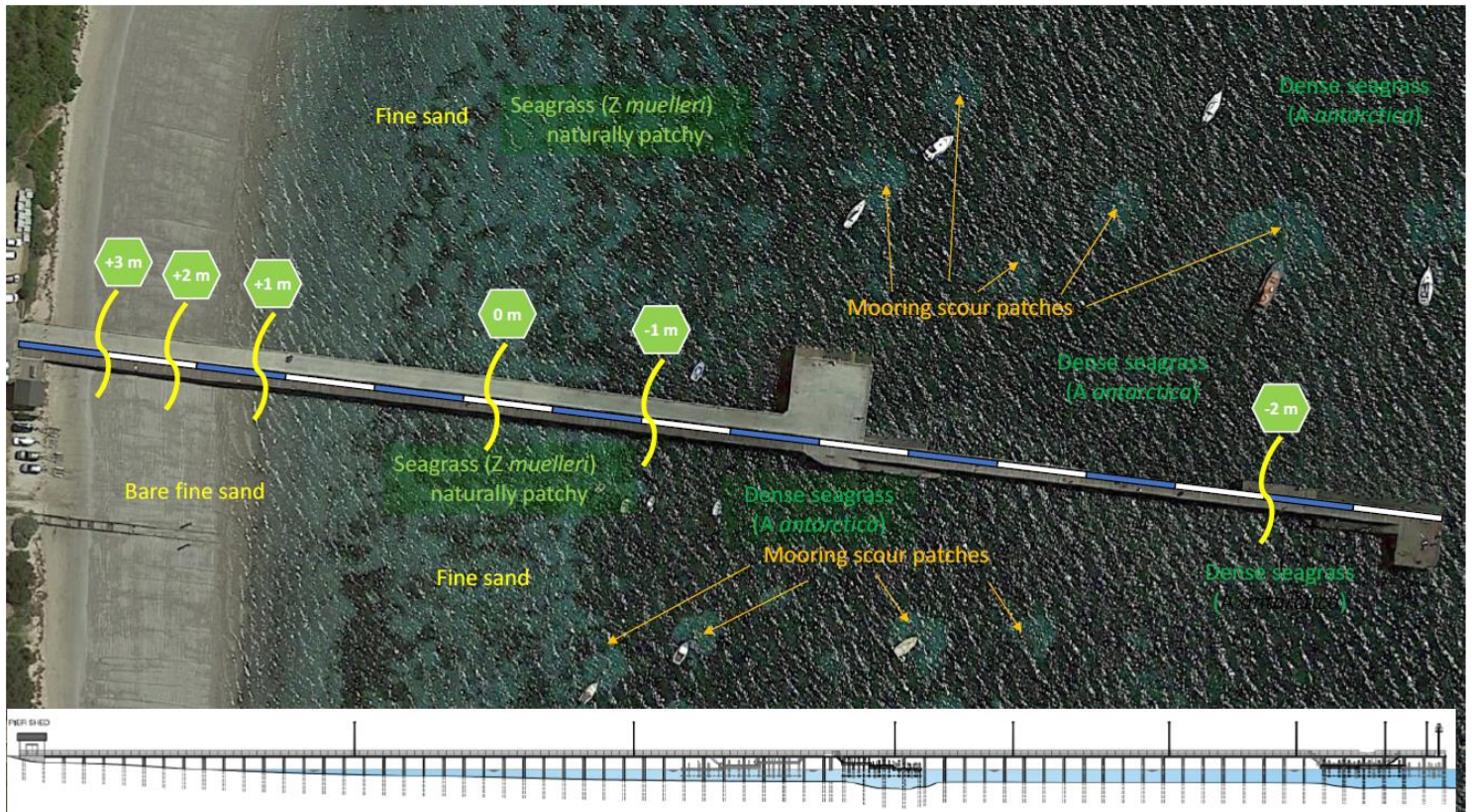
²⁶ The Encyclopedia of Australian Architecture or

Flinders Telegraph Cable Complex and Pier

VHR No: PROV VHR H2413

Hermes No: 208208

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2021, Flinders Pier natural seabed habitats, species of sea grass present, and approximate distances.

Seagrass species - *A. Antarctica* = *Amphibolis antarctica*; *Z. muelleri* = *Zostera muelleri*

Source: CEE (Consulting Environmental Engineers, 2021)



2021, Pier, timber deterioration with the appearance of insect attack



2021, Surface corrosion of painted steel under pier

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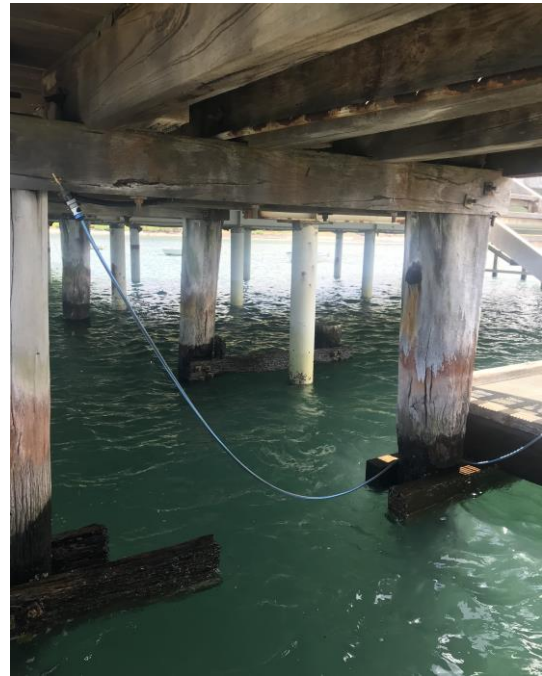
2021, One pile with apparent structural issues



2022, Fishing shed, some timber weathering

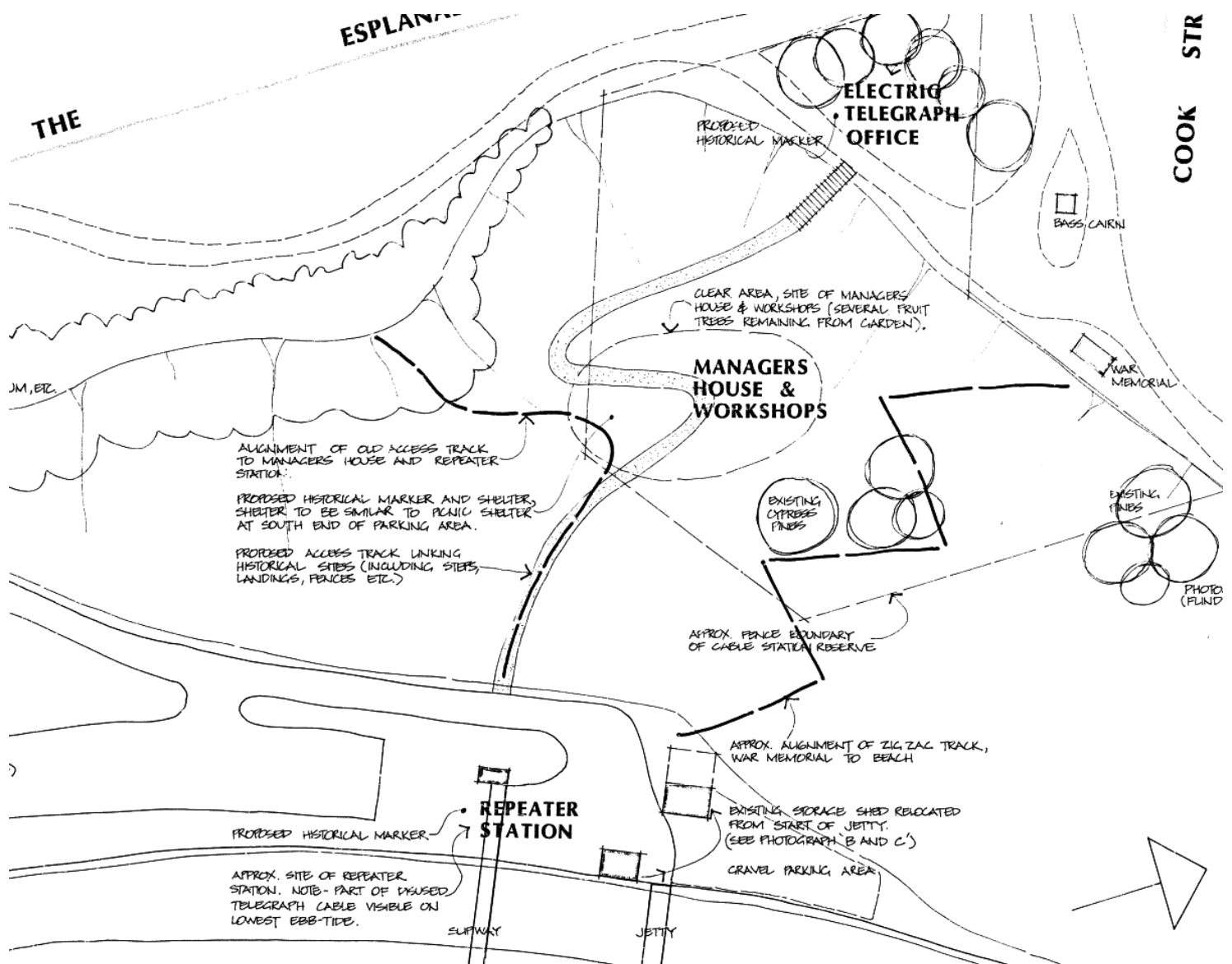


2021, Deterioration of painted timber and iron bollard



2021, Deterioration of timber pile

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1985, Detail from indicative sketch of the site. The new path from the foreshore to the reserve was not constructed until 1999 and may be in a different location to that shown. . The former telegraph cable complex features are marked. It appears to show that a repeater station (likely a cable test house) was located above the slipway, possibly where the winch house is located now.

Source: Mornington Peninsula Shire Council. Drawing C36_13_001

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Statutory requirements under section 40.

Terms of the recommendation (section 40 (3)(a))

The Executive Director, Heritage Victoria recommends that the Flinders Telegraph Cable Complex and Pier is included in the VHR in the category of registered place, registered archaeological place and registered object integral to a registered place

Information to identify the place or object (section 40(3)(b))

Name: Flinders Telegraph Cable Complex and Pier

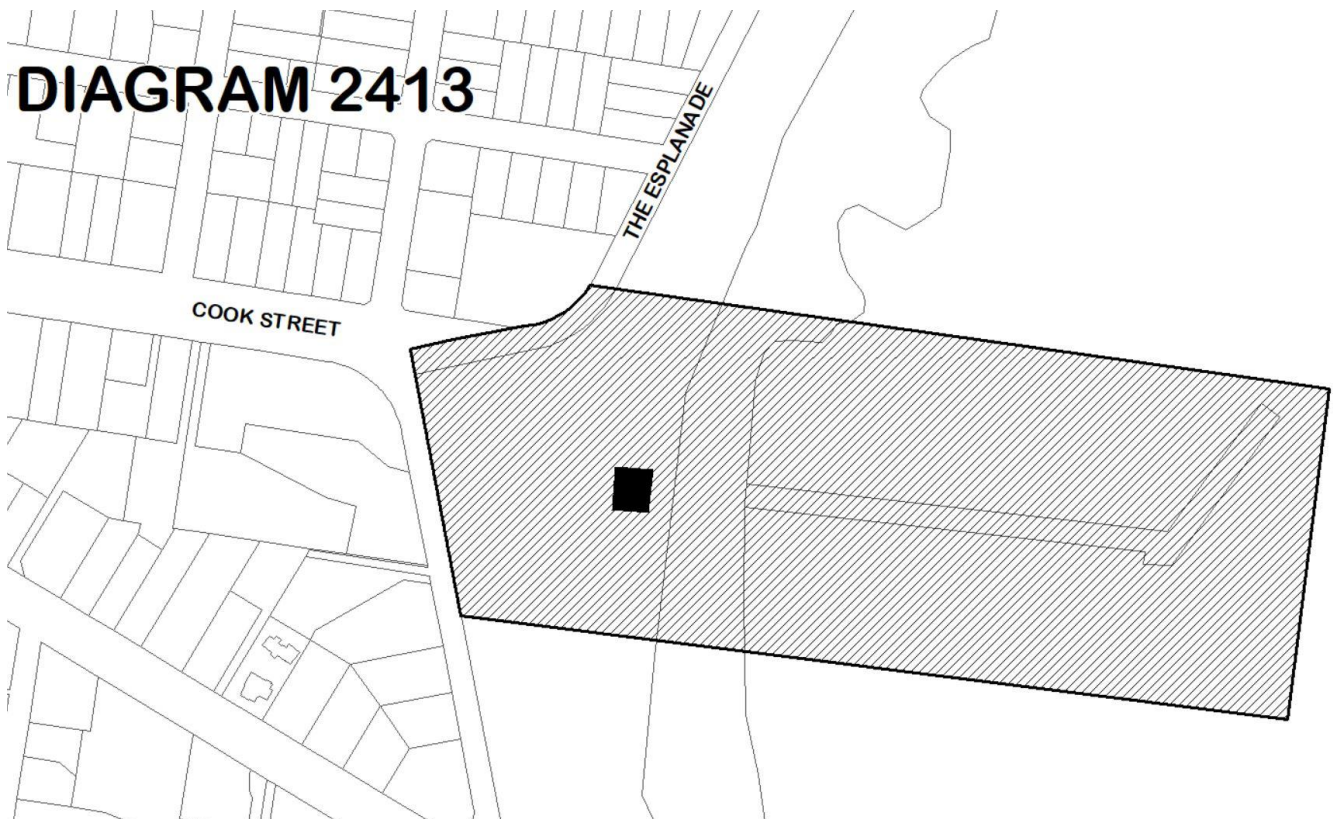
Address: The Esplanade, Flinders

Proposed extent of registration

The Executive Director recommends that the extent of registration for the Flinders Telegraph Cable Complex and Pier be gazetted as:

All of the place shown hatched on Diagram 2413 encompassing all of Allotment 16B Parish of Flinders, and the parts of Allotment 29A Section A Township of Flinders, Lot 16A Township of Flinders, and part of the road reserve of The Esplanade.

All of the registered objects integral the place are listed in the inventory of non-fixed objects integral to the place held by the Executive Director.



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Aerial Photo of the Place Showing Proposed extent of registration



Aerial Photo of the Place Showing Proposed extent of registration with measurements



Note: These aerial views provide a visual representation of the place. They are not a precise representation of the recommended extent of registration. Due to distortions associated with aerial photography some elements of the place may appear as though they are outside the extent of registration.

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Rationale for the extent of registration

The recommended extent of registration of the Flinders Telegraph Cable Complex and Pier includes:

Northern boundary – 110m from the northern edge of the timber pier

Eastern boundary – 90m from the eastern edge of the timber pier

Southern boundary - 100m from the southern edge of the timber pier

Western boundary – Crown land boundary to The Esplanade then 15m north of that boundary along the curved alignment of The Esplanade.

This area has been recommended in order to include all the potential archaeological deposits relating to the cable station and other activities at the place, including those under the seabed. The recommended extent of the registration is the same as the extent of registration nominated by the Executive Director in March 2022. It differs from the extent of registration accepted on 12 August 2021 which did not include the seabed around the Pier and included more of the foreshore and some objects which were not considered to be integral to the place.

The nomination accepted on 12 August 2021 included Fishermen's Cottage Sites on the foreshore to the south of the Pier. These remains were considered not to be of State-level significance and are not included in the recommended extent of registration. The existing entry in the Victorian Heritage Inventory for H7921-0107 Flinders Foreshore Fishermen's Huts is currently outside the proposed extent of registration. The extent of this inventory site will be corrected to join the proposed extent for the Flinders Telegraph Cable Complex and Pier in order to recognise the archaeological potential but not at the State level of the fishermen's huts formerly located in this area.

Objects Integral associated with the registered place These objects relate to the cable station complex, the former Jetty Cargo Shed and other activities at the place.

It should be noted that the proposed extent of registration in the VHR includes all the land, plantings, all buildings (interior and exterior structures, works and fixtures), any archaeological features and the objects integral to the understanding of the cultural heritage significance of the place. A permit or permit exemption from Heritage Victoria is required for any works within the proposed extent of registration, apart from those identified as exempt in the categories of works or activities in this recommendation.

The Former Jetty Cargo Shed is included in the VHR as a separate Registered Place (VHR H0906). The Former Jetty Cargo Shed is important to the cultural heritage significance of the Flinders Telegraph Station Complex and Pier but is also of significance in its own right and was included in the VHR in 1992. The extent of registration for the Former Jetty Cargo Shed (indicated on the diagram and aerial photograph on the preceding page) overlaps the proposed extent of registration for the Flinders Telegraph Station Complex and Pier.

This approach is consistent with a number of other registrations where overlapping registrations apply. Examples include the registration of the sculpture Forward Surge (VHR H2378) which overlaps the registration of the Victorian Arts Centre (VHR H1500) or the registration of the Former Grand Rank Cabman's Shelter (VHR H0849) which overlaps the registration of Yarra Park (VHR H2251).

The two Heritage Inventory sites listed below which are included in both nominated extents of registration will be removed from the Victorian Heritage Inventory because they are included in the site which is proposed for inclusion in the Victorian Heritage Register as a Registered Archaeological Place:

- H7921-0108 Flinders Pier And Slipways Precinct
- H7921-0073 Flinders Cable Station Site

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Reasons for the recommendation, including an assessment of the State-level cultural heritage significance of place/object/object integral (section 40(3)(c))

Following is the Executive Director's assessment of the place and objects integral against the tests set out in *The Victorian Heritage Register Criteria and Thresholds Guidelines*. A place or object must be found by the Heritage Council to meet Step 2 of at least one criterion to meet the State level threshold for inclusion in the VHR.

CRITERION A: Importance to the course, or pattern, of Victoria's cultural history.

Step 1: Test for satisfying Criterion A

The place/object has a *CLEAR ASSOCIATION* with an event, phase, period, process, function, movement, custom or way of life in Victoria's cultural history.
plus
The association of the place/object to the event, phase, etc *IS EVIDENT* in the physical fabric of the place/object and/or in documentary resources or oral history.
plus
The *EVENT, PHASE, etc* is of *HISTORICAL IMPORTANCE*, having made a strong or influential contribution to Victoria.

Executive Director's Response

The Flinders Telegraph Cable Complex and Pier has a clear association with the installation and operations of submarine telegraphic communications in Victoria.

The association of the Flinders Telegraph Cable Complex and Pier with the installation and operations of telegraphic communications in Victoria is mainly evident in historic photographs as well as primary and secondary documentary resources. Aside from the pier, and objects integral, the remaining physical fabric may survive under the ground or seabed with the possible exception of plantings from the garden of the first cable station.

Telegraphic communication has made a strong and influential contribution to Victoria by enabling rapid communication between Victoria and the other states and overseas. Before the advent of telegraphy all messages had to be sent by road or sea transport.

Flinders was the port for transporting local primary produce and fish to market in Melbourne and was also associated with fishing. These associations are mainly evident in the pier and also in documentary resources because the tramway and fishermen's huts are no longer present, although evidence of the huts may remain under the ground of the foreshore. Fishing and transport of goods has made a strong and influential contribution to Victoria.

Step 1 of Criterion A is likely to be satisfied.

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Step 2: Test for satisfying Criterion A at the State Level

The place/object allows the clear association with the event, phase etc. of historical importance to be *UNDERSTOOD BETTER THAN MOST OTHER PLACES OR OBJECTS IN VICTORIA WITH SUBSTANTIALLY THE SAME ASSOCIATION.*

Executive Director's Response

Similar levels of fishing and goods transport occurred at many other piers and jetties in Victoria and Flinders Pier does not allow this association to be better understood than other places in Victoria.

The only other historic submarine telegraph cable stations in Victoria are located at Apollo Bay, Cape Otway and Gabo Island. All these sites have standing cable station buildings unlike Flinders. The station at Apollo Bay began telephone as well as telegraph operations in 1936 which is substantially later than at Flinders which began telegraphic operations in 1869. The cable station operations at Cape Otway and Gabo Island were smaller in scale than those at Flinders and Apollo Bay.

The Flinders Telegraph Cable Complex and Pier is the site where the first successful submarine telegraph cable between Victoria and Tasmania was installed and operated. This was an important event that finally successfully linked the Australian mainland to Tasmania via telegraphic communication. This was the first time that residents of all the Australian colonies had been able to communicate with each other reliably and swiftly. No other site in Victoria allows this association to be better understood.

Criterion A is likely to be satisfied at the State level.

CRITERION B: Possession of uncommon, rare or endangered aspects of Victoria's cultural history.

Step 1: Test for Satisfying Criterion B

The place/object has a *clear ASSOCIATION* with an event, phase, period, process, function, movement, custom or way of life of importance in Victoria's cultural history.

plus

The association of the place/object to the event, phase, etc *IS EVIDENT* in the physical fabric of the place/object and/or in documentary resources or oral history.

plus

The place/object is *RARE OR UNCOMMON*, being one of a small number of places/objects remaining that demonstrates the important event, phase etc.

or

The place/object is *RARE OR UNCOMMON*, containing unusual features of note that were not widely replicated

or

The existence of the *class* of place/object that demonstrates the important event, phase etc is *ENDANGERED* to the point of rarity due to threats and pressures on such places/objects.

Executive Director's Response

The Flinders Telegraph Cable Complex and Pier has a clear association with submarine telegraph cables and the first successful telegraphic connection between Tasmania and the Mainland. This association is evident in documentary resources and physical fabric.

While it is one of only three submarine telegraph stations in Victoria, it could not be considered to be rare because only one submarine telegraph station was needed for Victoria between 1869 and 1936.

Step 1 of Criterion B is not likely to be satisfied.

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CRITERION C: Potential to yield information that will contribute to an understanding of Victoria's cultural history.

Step 1: Test for Satisfying Criterion C

The:

- visible physical fabric; &/or
- documentary evidence; &/or
- oral history,

relating to the place/object indicates a likelihood that the place/object contains *PHYSICAL EVIDENCE* of *historical interest* that is *NOT CURRENTLY VISIBLE OR UNDERSTOOD*.

plus

From what we know of the place/object, the physical evidence is likely to be of an *INTEGRITY* and/or *CONDITION* that it *COULD YIELD INFORMATION* through detailed investigation.

Executive Director's Response

The surface archaeological assessment and documentary evidence relating to the former hilltop Cable Station and Happy Valley site have demonstrated that they contain (or have a very high level of potential to contain) historical archaeological features, deposits and artefacts associated with the construction and use of the place as a telegraph station complex.

The foreshore area has the potential to contain archaeological remains associated with former cable test house buildings, and a cable hut and repeater station, as well as other associated elements of the telegraph cable complex, and related artefacts. There may also be remains relating to fishing families' quarters and activities. It was not possible to identify any of these elements from the surface due to the current site condition.

Documentary evidence relating to the installation of the submarine telegraph cables has shown that the seabed on either side of the pier has a very high level of potential to contain remains of cables and trenches, as well as archaeological deposits of artefacts lost or discarded from cable laying and repair vessels as well as from fishing vessels and other users of the pier.

Further analysis of the fishing shed next to the pier and the plinth of the winch shed may clarify if either of these was associated with the Flinders Telegraph Cable Complex or with fishing, cargo handling or supply of refreshments.

Ground observations and investigation into physical change to the area indicate that the integrity and condition of the physical fabric at the place is likely to reveal significant information through detailed analysis.

Step 1 of Criterion C is likely to be satisfied.

Step 2: State Level Significance Test for Criterion C

The knowledge that might be obtained through investigation is likely to *MEANINGFULLY CONTRIBUTE* to an understanding of Victoria's cultural history.

Plus

The information likely to be yielded from the place/object is *not* already *well documented* or *readily available* from other sources.

Executive Director's Response

The precise locations of all of the five cables installed at the place, as well as their underground infrastructure is not known. The test houses are likely to have had concrete plinths which will demonstrate their operations. The locations, sizes and formats of all the buildings associated with the cable operations are also not fully understood. Archaeological investigation and building analysis are very likely to be able to provide this information which will meaningfully contribute to an understanding of operations at the place

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

The fishermen's huts appear to have extended all along the beach. Most beaches in Victoria had similar structures. The knowledge gained from further archaeological investigation of these huts will not meaningfully contribute to an understanding of Victoria's cultural history of the fishing industry in Western Port.

The available documentary evidence only provides partial evidence relating to the activities on the site.

Criterion C is likely to be satisfied at the State level.

CRITERION D: Importance in demonstrating the principal characteristics of a class of cultural places and objects.

Step 1: Test for Satisfying Criterion D

The place/object is one of a *CLASS* of places/objects that has a *clear ASSOCIATION* with an event, phase, period, process, function, movement, important person(s), custom or way of life in Victoria's history.

plus

The *EVENT, PHASE, etc* is of *HISTORICAL IMPORTANCE*, having made a strong or influential contribution to Victoria.

plus

The principal characteristics of the class are *EVIDENT* in the physical fabric of the place/object.

Executive Director's Response

The Flinders Telegraph Cable Complex and Pier is of the class of Postal and Telecommunications places and the sub-class of Telegraph Stations. It has a clear association with the installation and operations of telegraphic communications in Victoria.

Telegraphic communication has made a strong and influential contribution to Victoria by enabling connection and rapid communication between Victoria and the other states and overseas. Before the advent of telegraphy all messages had to be sent by road or sea transport.

The principal characteristics of Telegraph Stations are no longer evident in the visible physical fabric of the place. While they are likely evident in archaeological features and deposits this is best considered under Criterion C.

Step 1 of Criterion D is not likely to be satisfied.

CRITERION E: Importance in exhibiting particular aesthetic characteristics.

Step 1: Test for Satisfying Criterion E

The *PHYSICAL FABRIC* of the place/object clearly exhibits particular aesthetic characteristics.

Executive Director's Response

The site of the Flinders Telegraph Cable Complex and Pier, especially the lookout and Kennon Cove, exhibits landscape related aesthetic characteristics. Some paintings and many photographs have been made of the site.

The 1922 Flinders War Memorial is a Federation style memorial designed by well-known Melbourne architect Chris Cowper. It demonstrates the refinement and craft-like quality of his design.

Timber piers are valued for their aesthetic qualities; however, these have been somewhat affected at the Flinders Pier due to the addition of the large concrete and steel section and replacement of the timber railings with tubular steel.

Step 1 of Criterion E is likely to be satisfied.

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Step 2: State Level Significance Test for Criterion E

The aesthetic characteristics are *APPRECIATED OR VALUED* by the wider community or an appropriately related discipline as evidenced, for example, by:

- *critical recognition* of the aesthetic characteristics of the place/object within a relevant art, design, architectural or related discipline as an outstanding example within Victoria; or
- wide public *acknowledgement of exceptional merit* in Victoria in medium such as songs, poetry, literature, painting, sculpture, publications, print media etc.

Executive Director's Response

The aesthetic characteristics of the the lookout and Kennon Cove at the site of the Flinders Telegraph Cable Complex and Pier are appreciated and valued by the community. Artworks and photographs have been made of the site since European settlement. However similar numbers of artworks and photographs have been made of many other areas of Victoria which have good views and attractive bays. The aesthetics do not demonstrate exceptional merit.

Chris Cowper's architecture is appreciated for its aesthetic characteristics within the discipline of architectural history. However, entries for Cowper in authoritative reference publications^{26,27} do not discuss the Flinders War Memorial, indicating that it has not received critical recognition or wide public acknowledgement within this discipline.

Criterion E is not likely to be satisfied at the State level.

CRITERION F: Importance in demonstrating a high degree of creative or technical achievement at a particular period.

Step 1: A Test for Satisfying Criterion F

The place/object contains *PHYSICAL EVIDENCE* that clearly demonstrates creative or technical *ACHIEVEMENT* for the time in which it was created.

plus

The physical evidence demonstrates a *HIGH DEGREE OF INTEGRITY*.

Executive Director's Response

The installation of all five submarine telegraph cables in Kennon Cove, was a complex and challenging task that was completed successfully by the UK based Telegraph Construction & Maintenance Company in 1869, 1885 and 1898 and by Siemens in 1909. These companies were very experienced and laid submarine telegraph cables all over the world, overcoming similar difficulties. The technical achievement was not out of the ordinary for the time.

Technical advances made in cable construction to improve communication and armoring were made in the UK not Australia. There is evidence that sections of cable have been pulled up from Kennon Cove over the years. The cables remaining buried in the ocean floor are likely to be corroded or broken and may not have a high degree of integrity.

Step 1 of Criterion F is not likely to be satisfied.

²⁶ The Encyclopedia of Australian Architecture or

²⁷ Australian Architectural Index <https://aai.app.unimelb.edu.au/apex/f?p=199:10:::>

Flinders Telegraph Cable Complex and Pier

VHR No: PROV VHR H2413

Hermes No: 208208

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

CRITERION G: Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons.

Step 1: Test For Satisfying Criterion G

Evidence exists of a community or cultural group. (A community or cultural group is a group of people who share a common interest, including an experience, purpose, belief system, culture, ethnicity or values.) plus Evidence exists of a strong attachment between the COMMUNITY OR CULTURAL GROUP and the place/object in the present-day context. plus Evidence exists of a time depth to that attachment.

Executive Director's Response

A community exists which values Flinders Pier for its ability to provide for its access to Victoria's popular marine emblem, the Common or Weedy seadragon (*Phyllopteryx taeniolatus*) in the wild. This community includes scientists, tourists, photographers, and those who view media relating to seadragons. Members of this community wish to protect the environment surrounding the pier and value traditional timber pier construction in and of itself and because they see it as a way to protect the dragon.

Evidence of a strong attachment between the scientist members of the community and the study of seadragons at the pier is demonstrated by published scientific research, documentaries, scientific photography and creation of citizen science programs that all involve the pier environment.

Evidence of a strong attachment between the non-scientist members of the community and the seadragons at the pier is demonstrated by the proliferation of popular science publications including many social media posts and videos created by professional and amateur underwater photographers and video makers; snorkel and scuba dive tour operators advertising Flinders Pier as the best place to see the seadragons; participation in citizen science programs. The movement to retain the timber fabric of the pier has become entwined with the conservation of the seadragon leading to over 40,000 signatures on a petition calling for the timber pier to be retained. People have been coming to the pier to access seadragons for at least 50 years and there is a time depth to this attachment.

Step 1 of Criterion G is likely to be satisfied.

Step 2: State Level Significance Test for Criterion G

Evidence exists that the social value resonates at a State Level, that is across the 'broader Victorian community'. (<i>'Resonance' means the extent to which the social value of a place/object can be demonstrated to exert an influence. The social value must resonate beyond a particular local, social or cultural community into the 'broader Victorian community'.</i>) Plus Evidence exists that the social value is part of an event or story that contributes to 'Victoria's identity'.

Executive Director's Response

Flinders Pier is known across Victoria as one of the best places in Victoria to view weedy seadragons because the presence of the pier means that the sea grass beds where the animal lives are easily accessible to scuba divers and snorkelers; it is close to Melbourne which makes it easy for scientists and the public to visit; the environment is unpolluted and there are no strong currents to wash away the fragile animals. While there is scientific and popular interest in multiple species in Victoria, the Weedy seadragon has particular potency as a symbol, being chosen as Victoria's marine emblem and becoming synonymous with marine conservation.

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

It is twenty years since the Weedy seadragon was proclaimed as Victoria's state emblem and Victoria's Marine National Park system was established. The valuing of Flinders Pier for its association with the seadragon is part of the story of appreciating and protecting Victoria's natural wonders and growing awareness of environmental and marine conservation.

Criterion G is likely to be 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.

Step 1: Test for Satisfying Criterion H

The place/object has a *DIRECT ASSOCIATION* with a person or group of persons who have made a strong or influential *CONTRIBUTION* to the course of Victoria's history.

plus

The *ASSOCIATION* of the place/object to the person(s) *IS EVIDENT* in the physical fabric of the place/object and/or in documentary resources and/or oral history.

plus

The *ASSOCIATION*:

- directly relates to *ACHIEVEMENTS* of the person(s) at, or relating to, the place/object; or
- relates to an *enduring* and/or *close INTERACTION* between the person(s) and the place/object.

Executive Director's Response

The Flinders Telegraph Cable Station Complex and Pier has direct associations with many people who designed, built and operated the Cable Station; fished at the pier and experience the seadragons around the pier. However almost none of these people made a strong or influential contribution to the course of Victoria's history. Two exceptions are Melbourne architect Chris Cowper and English broadcaster, biologist, natural historian and author Sir David Attenborough.

Chris Cowper has made an influential contribution to Queen Anne Revival and Federation Architecture in Victoria. The association of Cowper with the Flinders War Memorial is evident in documentary resources. But Cowper is better known for his architecture at, for example, the Grace Park Estate at Hawthorn than the Flinders War Memorial.

Sir David Attenborough has visited Victoria many times, his books sell in large numbers, and he has made documentaries and public announcements which are widely viewed in Victoria. He has made an influential contribution to the increase in environmental awareness in Victoria. However, he is better considered a figure of international renown rather than a figure of particular importance to Victoria's history.

Step 1 of Criterion H is not likely to be satisfied.

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Objects Integral

The definition of an 'object' can be found in the Heritage Council's *Policy: objects integral to a registered place*. The objects associated with this place are considered to be archaeological artefacts integral to the registered place under s.31(2)(b) of the *Heritage Act 2017*.

Background

These objects appear to have been collected from the site and given to the Flinders District Historical Society.

Objects integral

The following fixed and movable objects are integral to the Flinders Telegraph Cable Complex and Pier. A list of these objects is provided in the Inventory at the end of this report.

Tests for the Inclusion of Objects Integral

The Heritage Council of Victoria's *Policy: objects integral to a registered place* notes that for the purposes of the Act, an object will be considered integral to a place if it satisfied the following tests.

Test 1 Contribution to meaning of the place		Test 2 Evidence of that contribution
The object (objects or collection) forms a key part of that place, being a component in its design, operation or use that contributes importantly to a richer and more complete understanding of its historical, cultural, technical, aesthetic and/or social meaning at a State level.	and	That contribution can be substantiated through physical, documentary or oral evidence.
Do the objects at the Flinders Telegraph Cable Complex and Pier satisfy Test 1?		Do the objects at the Flinders Telegraph Cable Complex and Pier satisfy Test 2?
<p>The objects listed in the inventory at the end of this document consist of pieces of the submarine telegraphic cable and morse code equipment used at the site. These demonstrate different cable technologies and morse code technologies used at the site including the cable connected to the site in Tasmania.</p> <p>The tools, fastenings and domestic remains demonstrate the working and living conditions of the former inhabitants of the site.</p> <p>Two objects further objects were nominated and are not listed in the inventory at the end of this document.</p> <p>6. Morse Code Key C1910.</p> <p>7. Modern Land Telegraph Cable illustrating additional armoured layer</p> <p>These are displayed in the Cargo Shed display but do not come from the Flinders Telegraph Cable Station</p>	and	<p>The contribution of the objects listed in the inventory can be substantiated through evidence in the form of documentary evidence held by the Flinders District Historical Society.</p> <p>The remaining nominated objects are not associated with the operations of the Flinders Telegraph Cable Station and do not satisfy Test 2.</p>
The objects satisfy Test 1		The objects in the inventory satisfy Test 2

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Comparisons

These places were selected as comparators to the Flinders Telegraph Cable Complex and Pier because they are archaeological places with landscape values, submarine telegraph stations with objects integral or timber piers.

Archaeological Places

Collins Settlement Site, 2700-3148 Point Nepean Road Sorrento (VHR H1050)

The Collins Settlement Site. 2700-3148 Point Nepean, Road Sorrento, is of historic, archaeological, aesthetic (landscape) and social significance to the State of Victoria.

The Collins Settlement Site, has aesthetic significance due to the survival of much of the pre-settlement landscape of Sullivan Bay....

The Collins Settlement Site has archaeological significance due to its potential to contain relics relating to the historic occupation of the site.



1996, Collins Settlement Site, Sorrento Foreshore Reserve

Great Ocean Road, Great Ocean Road between Torquay and Allansford (VHR H2261)

The Great Ocean Road, Great Ocean Road between Torquay and Allansford is of historical, archaeological, aesthetic and social significance to the State of Victoria.

The Great Ocean Road is of archaeological significance for its potential to contain features, deposits and/or relics associated with the construction and occupation of construction campsites and toll booths that will contribute to an understanding of the construction and operation of the Great Ocean Road.

The Great Ocean Road is of aesthetic significance as a sinuous road winding through dramatic topography

The Great Ocean Road is socially significant for its provision of access to popular places for recreation and leisure. The Victorian community continues to demonstrate its attachment to the Great Ocean Road by using it to access these places.



ca. 1930, Great Ocean Road, possible construction camp. Source: State Library of Victoria²⁸

²⁸ <http://handle.slv.vic.gov.au/10381/382258>

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Cape Schank Lightstation, 164-420 Cape Schanck Road Cape Schanck (VHR 1748)

The Cape Schank Lightstation, 164-420 Cape Schanck Road Cape Schanck is of historical, architectural, scientific, social and archaeological importance to the State of Victoria

The Cape Schank Lightstation is archaeologically important for its potential to reveal significant artefact remains pertaining to the use of the place as a lightstation and signal station. There are ... sites of demolished buildings, in particular the signal station, which have a high archaeological potential. The former stone signal station was similar to the one at Cape Otway,



1998, Cape Schank Lightstation

Submarine telegraph stations

Cape Otway Lightstation, 1140 Lighthouse Road Cape Otway. (VHR H1222)

Cape Otway Lightstation, 1140 Lighthouse Road Cape Otway is of historical, architectural and social importance to the State of Victoria. The signal station is important as a fine and rare example of a building type.

The Cape Otway Lightstation includes a signal station which was built in 1859 and was a link in the first telegraph connection across Bass Strait. The submarine telegraph connection failed within two years. Communications then operated using a flag signalling from ships and land telegraphy.



Date unknown, Cape Otway Lightstation, Telegraph Station, 1859.
Source: Travel Victoria²⁹

Submarine Cable Station, 6250 Great Ocean Road Apollo Bay (HO14)

The Apollo Bay Submarine Cable Station, 6250 Great Ocean Road Apollo Bay has not been assessed for inclusion in the VHR.

The Apollo Bay Cable Station is the site from which the first undersea telephone cable connected Tasmania with the mainland in 1936. The red brick cable station, some associated structures and weatherboard residence are still standing. This complex did not have test houses because the cable entered the cable station building directly via a concrete lined tunnel which is still in existence. The cable station building is now a museum and is open to the public. It holds a large and comprehensive collection of objects and archives associated with telegraph and telephone communications at this site.



2021, Submarine Cable Station, Apollo Bay

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Gabo Island Lightstation, Gabo Island (VHR H1843)

Gabo Island Lightstation, Gabo Island is of historical, architectural and archaeological significance to the State of Victoria.

The telegraph residence is of architectural interest as an early (1886) use of mass concrete in a residential building and as the only concrete lightstation residence in Victoria.

Gabo Island, and in particular the area around the harbour, is of archaeological significance for the potential and known existence of artefactual remains from many important periods.

The telegraph station operated from 1870 using telegraph poles in the ocean with a submarine cable installed by 1881. It enabled communications between ships and the mainland. The telegraphic objects, which are part of the larger lightstation collection, are not included in the statement of significance or extent of registration. These objects include insulators and the remains of the flagpole which was used to exchange messages with the ships which were then sent to and from the mainland by the submarine telegraph.



1999, Gabo Island Lightstation, Telegraph Station (left) and residence

Timber piers

Kerferd Road Pier, off Kerferd Road and Beaconsfield Parade Albert Park (VHR H1534)

The Kerferd Road Pier, Albert Park, is of historical, architectural and archaeological significance to the State of Victoria.

The Kerferd Road Pier is of historical significance for its role in the development of the Albert Park foreshore as a fashionable seaside resort and in the growth of sea-bathing as a popular recreational activity in the late nineteenth and early twentieth centuries. It remains an important local landmark.

The Kerferd Road Pier and the seabed beneath and surrounding it are of archaeological significance for their potential to reveal artefacts scattered by users of the pier and adjacent beach facilities since the 1880s. It is significant that the seabed surrounding the pier has not been dredged therefore increasing the archaeological potential of the site.



2008, Kerferd Road Pier

²⁹ <https://www.travelvictoria.com.au/capeotway/photos/>

Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Queenscliff Pier and Lifeboat Complex, Symonds Street, Queenscliff (VHR H1515)

The Queenscliff Pier and Lifeboat Complex, Symonds Street, Queenscliff is of historical, architectural, aesthetic and technological significance to the State of Victoria.

The Queenscliff Pier and Lifeboat complex is of architectural significance as a collection of rare surviving intact timber pier structures. The lifeboat shed is of architectural significance as a rare intact example of a jetty mounted lifeboat shed. Few if any of these sheds remain in Victoria. Similarly, the barrel shape of the shed roof is an uncommon aspect generally seen only in nineteenth century railway goods sheds.



2001, Queenscliff Pier, waiting room and lifeboat shed

Summary of Comparisons

Archaeological Places with landscape values

The Great Ocean Road and Collins Settlement Site have archaeological potential to demonstrate road construction and early settlement activities. Only the Cape Schank Lightstation site is similar to Flinders with archaeological potential for buried remains of the cable station buildings and operations. This is the site where messages from Flinders were likely amplified and forwarded to Melbourne.

The landscape values of all three sites also contribute to their significance. The Great Ocean Road is also a popular location for whale watching, scuba diving and snorkelling, however its statement of significance documents this as the provision of access to places for recreation and leisure without specifying interaction with marine wildlife. It is documented as being significant because it is part of the story of *appreciating and protecting Victoria's natural wonders*

Submarine telegraph stations with objects integral

The standing cable station buildings at Cape Otway and Gabo Island are of architectural significance – a very different situation to the archaeological remains at Flinders. However, it appears that these telegraph stations were mainly used for communications with ships rather than more general telegraphy. The scope of the submarine cable station at Cape Otway was planned to be greater but reduced soon after it was constructed.

The submarine cable station at Cape Otway may be of comparable significance and the predecessor to that at Flinders. However, it only operated the submarine cable for less than two years before the cable failed permanently. Then it was only used to communicate with ships. There may be buried remains of other submarine cable infrastructure on the site.

Most of the objects associated with the telegraph operations at Gabo Island are of less significance than those at Flinders because insulators are common objects, often found on archaeological sites. The flagpole is of comparable significance to the objects at Flinders.

The submarine cable station at Apollo Bay appears to be of comparable significance and the successor to that at Flinders. It represents the next stage of modern submarine communications since it enabled telephone communications as well as telegraphic communications. The collection demonstrates all aspects of telegraphic and telephone communications from the early years of the twentieth century. However, this place and collection have not been assessed for inclusion in the VHR.



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

None of the other six telegraph stations recorded in the VHR operated submarine cables. Flinders also has the distinction of being the location of the first successful telegraphic link between Tasmania and the mainland, linking the colonies for the first time.

Timber piers

The Queenscliff and Kerferd Road piers are of similar size to that at Flinders, but they are closer to their original appearance being apparently made of timber with white painted timber railings. They do not appear to have concrete additions or steel piles. Both would have been extensively rebuilt over their lives and are unlikely to contain any original timber.

The Kerferd Road Pier was one of a few piers that were built largely as recreational piers in Port Phillip Bay in the nineteenth century. The Queenscliff pier is noted for its associations with the lifeboat service, the sea pilot service, the famous bay ferries and paddle steamers rather than fishing which took place at another pier in Queenscliff. Flinders Pier is associated with fishing and the landing of cargo and passengers. The piers at Flinders and Queenscliff are now used for recreation and fishing as Kerferd Road always had been.

Queenscliff Pier is known as a popular diver training site and is 1.4km away from Pope's Eye where it is possible for fitter divers and snorkellers to see dolphins and seals, which are very popular marine animals. Kerferd Road pier is also popular for general snorkelling but is not known for its access to particular species. These uses of these piers are not recognised in their statements of significance.

The other four piers recorded in the VHR (Station Pier, VHR H0985; Princes Pier, VHR H0981; Gellibrand and Breakwater Piers, H1088) are far larger than that at Flinders, were used for major shipping or immigration; or are made from bluestone as well as timber. They are also located in more industrial areas of Port Phillip Bay and are unlikely to provide access to iconic marine animals.

Conclusions

The archaeological potential of the Flinders Cable Station Complex and Pier is at a similar level to those of other places such as the Great Ocean Road and the Collins Settlement site which are also registered for their archaeological potential.

The Gabo Island and Cape Otway telegraphic cable stations appears to have been smaller scale telegraphic operations than that at Flinders. The operation at Apollo Bay is of comparable scale to that at Flinders, and the collection is more comprehensive, but the telegraphic operations took place considerably later. All these sites have standing cable station buildings unlike Flinders, but the Flinders Cable Station Complex and Pier had a greater variety of buildings and more cables installed throughout its life. For example, it does not appear that test houses were installed at Apollo Bay or Gabo Island.

Unlike the pier at Flinders, the other two registered piers have more visual integrity, are still made of timber and have not had concrete additions. Like the pier at Flinders, Queenscliff Pier also provides access to popular marine animals, however, it appears to be the only registered pier to do so. Some swimming is required at Queenscliff; therefore, access is easier at Flinders since the seadragons can be seen under the pier as well as being found further out in Kennon Cove.

The registered part of the Great Ocean Road provides an opportunity to view iconic marine species without needing to enter the water, but piers give divers a different experience of marine animals and better access to deeper water where most marine animals live. The extent of registration of the Great Ocean Road does not include piers. When compared to the Great Ocean Road, Flinders Pier provides comparable or better access to marine wildlife.



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Summary of cultural heritage significance (section 40(4)(a))

The ED recommends that the Flinders Telegraph Cable Complex and Pier be included in the VHR as a Registered Place, a Registered Archaeological Place and Registered Objects Integral to a Registered Place.

Statement of significance

What is significant?

Flinders Telegraph Cable Complex and Pier was established in the 1860s and provided an essential telegraphic link between mainland Australia and Tasmania for seven decades. Evidence of the Telegraph Complex survives in the Pier and exotic plantings and in archaeological remains from between 1869 and the 1940s including the first of three cable station buildings at Flinders, staff residences and workshops (known as *Happy Valley*); three cable test houses and one repeater station as well as buried telegraph cables and cable trenches under the land and the seabed surrounding the pier and associated archaeological deposits. Also significant is Flinders Pier, constructed in timber from 1864, including the submerged remains of a now demolished breakwater, the fishing shed (which may be a relocated goods shed/kiosk) and the cargo shed (VHR H0906).

How is it significant?

The Flinders Telegraph Cable Complex and Pier is of historical, archaeological and social significance to the State of Victoria. It satisfies the following criteria for inclusion in the Victorian Heritage Register:

Criterion A

Importance to the course, or pattern, of Victoria's cultural history.

Criterion C

Potential to yield information that will contribute to an understanding of Victoria's cultural history.

Criterion G

Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons.

Why is it significant?

The Flinders Telegraph Cable Complex and Pier is historically significant for its association with the installation and first successful operation of submarine telegraphic communications in Victoria and the site where telegraphic communications between Victoria and Tasmania were installed, operated and expanded for seven decades until the introduction of telephonic communications in the 1930s. This connected trading partners Victoria and Tasmania and enabled rapid communication between Tasmania and the rest of Australia and the world. [Criterion A]

The Flinders Telegraph Cable Complex and Pier is archaeologically significant for its potential to contain archaeological features, deposits and artefacts that relate to the use of the place as a substantial and early submarine telegraph complex. These features and deposits have the potential to reveal information about the construction and location of buildings and other structures. Investigations could reveal information about the establishment, human occupation and development of the place over time, as well as its subsequent abandonment. [Criterion C]



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

The Flinders Pier is socially significant to the community that has grown around the scientific study and popular observation of the Victorian Common or Weedy Seadragon, *Phyllopteryx taeniolatus*. The pier has been a focus of accelerating levels of activity related to the study and observation of seadragons since at least the 1970s. There is a resonance to this attachment, both because of the high profile and popular appeal of the seadragon and because of the widespread attachment of the community who are drawn to this location. [Criterion G]



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Categories of works or activities (permit exemptions) recommended under section 38 (section 40(4)(b))

Introduction

The purpose of this information is to assist owners and other interested parties when considering or making decisions regarding works to a registered place. It is recommended that any proposed works be discussed with an officer of Heritage Victoria prior to making a permit application. Discussing proposed works will assist in answering questions the owner may have and aid any decisions regarding works to the place.

It is acknowledged that alterations and other works may be required to keep places and objects in good repair and adapt them for use into the future. However, under the Act a person must not knowingly, recklessly or negligently remove, relocate or demolish, damage or despoil, develop or alter or excavate all or any part of any part of a registered place without approval. It should be noted that the definition of 'develop' in the Act includes any works on, over or under the place.

If a person wishes to undertake works or activities in relation to a registered place or registered object, they must apply to the Executive Director for a permit. The purpose of a permit is to enable appropriate change to a place and to effectively manage adverse impacts on the cultural heritage significance of a place as a consequence of change. If an owner is uncertain whether a heritage permit is required, it is recommended that Heritage Victoria be contacted.

Permits are required for anything which alters the place or object, unless a permit exemption is granted. Permit exemptions usually cover routine maintenance and upkeep issues faced by owners as well as minor works or works to the elements of the place or object that are not significant. They may include appropriate works that are specified in a conservation management plan. Permit exemptions can be granted at the time of registration (under section 38 of the Act) or after registration (under section 92 of the Act). It should be noted that the addition of new buildings to the registered place, as well as alterations to the interior and exterior of existing buildings requires a permit, unless a specific permit exemption is granted.

Disrepair of registered place or registered object

Under section 152 of the Act, the owner of a registered place or registered object must not allow that place or object to fall into disrepair.

Failure to maintain registered place or registered object

Under section 153 of the Act, the owner of a registered place or registered object must not fail to maintain that place or object to the extent that its conservation is threatened.

Conservation management plans

It is recommended that a Conservation Management Plan is developed to manage the place in a manner which respects the cultural heritage significance defined by its registration. A number of earlier Conservation Management Plans exist which may provide useful information.

Archaeology

Ground disturbance may affect the archaeological significance of the place and, subject to the exemptions stated in this document, requires a permit. Existing trees should be managed to ensure that they are not damaging archaeological remains.



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Aboriginal cultural heritage

To establish whether this place is registered under the *Aboriginal Heritage Act 2006* please contact First Peoples – State Relations in the Department of Premier and Cabinet. The *Heritage Act 2017* and the *Aboriginal Heritage Act 2006* are separate pieces of legislation. Please be aware that both Acts are required to be satisfied and satisfying the requirements of one Act may not satisfy the requirements of the other.

If any Aboriginal cultural heritage is discovered or exposed at any time it is necessary to immediately contact First Peoples – State Relations in the Department of Premier and Cabinet to ascertain requirements under the *Aboriginal Heritage Act 2006*. If works are proposed which have the potential to disturb or have an impact on Aboriginal cultural heritage it is necessary to contact First Peoples – State Relations in the Department of Premier and Cabinet to ascertain any requirements under the *Aboriginal Heritage Act 2006*.

Other approvals

Please be aware that approval from other authorities (such as local government) may be required to undertake works.

Human remains

If any suspected human remains are found during any works or activities, the works or activities must cease. The remains must be left in place and protected from harm or damage. Victoria Police and the State Coroner's Office must be notified immediately. If there are reasonable grounds to believe that the remains are Aboriginal, the Coronial Admissions and Enquiries hotline must be contacted immediately. As required under section 17(3)(b) of the *Aboriginal Heritage Act 2006* all details about the location and nature of the human remains must be provided to the Secretary (as defined in the *Aboriginal Heritage Act 2006*).

Notes

- All works should ideally be informed by a Conservation Management Plan prepared for the place. The Executive Director is not bound by any Conservation Management Plan, and permits still must be obtained for works suggested in any Conservation Management Plan.
- Nothing in this determination prevents the Heritage Council from amending or rescinding all or any of the permit exemptions.
- Nothing in this determination exempts owners or their agents from the responsibility to seek relevant planning or building permits where applicable.

General Conditions

- All exempted alterations are to be planned and carried out in a manner which prevents damage to the fabric of the registered place including the potential archaeological resource.
- Should it become apparent during further inspection or the carrying out of works that original or previously hidden or inaccessible details of the place are revealed which relate to the significance of the place, then the exemption covering such works must cease and Heritage Victoria must be notified as soon as possible.

Place specific advice in relation to Applications for Permits and Permit Exemptions

Appreciation of Weedy seadragons

To ensure the continued ability of the scientific community and the public to access seadragons from the pier, all repair, replacement and maintenance methodologies and materials proposed to be used on the pier, ocean and seabed should be evaluated by an independent marine biologist working with a materials specialist. The materials and methodologies should be evaluated both alone and in combination with other materials present or proposed to ensure that the study and appreciation of the seadragons is not compromised by these works. This evaluation should accompany all applications for permits and permit exemptions.



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

Pier and boat ramp

Timber components of the pier and boat ramp which are subject to wear, weathering and pest attack have been continuously repaired and replaced with timber since the pier was constructed. This process should be allowed to continue. Boat launching should take place away from the historic cable landing areas.

Building remains

Some of the structures on the site may be repurposed earlier structures or have been constructed on concrete pads previously used for other purposes. This eventuality should be considered when formulating works proposals.

Significant memorials and structures

The Flinders War Memorial and fishing shed should be repaired using traditional materials.

New plantings

New plantings should be monitored to ensure that they are not impacting on the registered archaeological deposits. Examples include the young Norfolk Island Pines planted in the reserve in the vicinity of the first Cable Station.

Fire suppression and vermin control

Management authorities should be aware of the location, extent and significance of historical and archaeological places and significant plantings when developing and implementing fire suppression, firefighting and vermin control strategies. Care should be undertaken when removing burrows for the potential impacts on the archaeological resource.

Permit Exemptions

The following permit exemptions are not considered to cause harm to the cultural heritage significance of the Flinders Cable Complex and Pier .

General

- Minor repairs and maintenance which replaces like with like.
- Repairs and maintenance must maximise protection and retention of significant fabric and include the conservation of existing details or elements. Any repairs and maintenance must not exacerbate the decay of fabric due to chemical incompatibility of new materials, obscure fabric or limit access to such fabric for future maintenance.
- Maintenance, repair and replacement of existing external services such as plumbing, electrical cabling, surveillance systems, pipes or fire services which does not involve changes in location or scale, or additional trenching.
- Repair to, or removal of items such as antennae; aerials; and air conditioners and associated pipe work, ducting and wiring.
- Works or activities, including emergency stabilisation, necessary to secure safety in an emergency where a structure or part of a structure has been irreparably damaged or destabilised and poses a safety risk to its users or the public. The Executive Director, Heritage Victoria, must be notified within seven days of the commencement of these works or activities.
- Painting of previously painted external surfaces in the same colour, finish and product type provided that preparation or painting does not remove all evidence of earlier paint finishes or schemes.



Statement of recommendation from the Executive Director, Heritage Victoria, to the Heritage Council of Victoria

- Cleaning including the removal of surface deposits by the use of low-pressure water (to maximum of 300 psi at the surface being cleaned) and neutral detergents and mild brushing and scrubbing with plastic (not wire) brushes.
- Works to the walls and roof of the winch shed providing these do not damage the potentially historic floor

Venues / public places / events

- The installation and/or erection of temporary elements associated with short term events for a maximum period of one week and no more than six times a year provided these are not located within three metres of the canopy edge of the mature Norfolk Island Pine, the Norfolk Island Hibiscus and the *Cordyline* and any affected areas of the place made good to match the condition of the place prior to installation. These elements include:
 - Temporary (lightweight) structures such as shelters, marquees and tents which are weighted down with sand bags or water tanks and minimise the requirement for driven metal stakes which could impact on archaeological deposits. Where pegging is not able to be avoided this is to be located to avoid archaeological deposits (i.e. not driven into if encountered).
 - Marquees, tents, stages, and the like.
 - Temporary security fencing, scaffolding, hoardings or surveillance systems to prevent unauthorised access or to secure public safety.
 - Temporary built or mobile structures, vendor and toilet vans which are located on existing hardstand and paved/asphalted areas and pathways or on turf areas with a protective surface (board or track mats).
 - Temporary infrastructure, including wayfinding/directional signage, lighting, public address systems, furniture and the like in support of events and performances which do not require fixing into the ground.
- Non-structural alterations to all existing promotional elements including billboards and flagpoles.
- Removal and replacement of information, directional and advertising signage within existing signage stands.

Landscape/ outdoor areas

Hard landscaping and services

- Subsurface works to existing watering and drainage systems provided these and do not involve trenching in new locations.
- Like for like repair and maintenance of existing hard landscaping including carparks, paving, footpaths and driveways where the materials, scale, form and design is unchanged.
- Removal or replacement of external directional signage provided the size, location and material remains the same.
- Installation of physical barriers or traps to enable vegetation protection and management of vermin such as rats, mice and possums.

Fire Suppression Duties

- Fire suppression activities such as fuel reduction burns, and fire control line construction, provided all significant historical and archaeological features are appropriately recognised and protected

Gardening, trees and plants

- The processes of gardening including mowing, pruning, mulching, fertilising, removal of dead or diseased plants, replanting of existing garden beds, disease and weed control and maintenance to care for existing plants.



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- Removal of tree seedlings and suckers without the use of herbicides.
- Management and maintenance of trees including formative and remedial pruning, removal of deadwood and pest and disease control. This should be completed by a qualified arborist for the early Norfolk Island Pine, Norfolk Island Hibiscus and *Cordyline* in the reserve area.
- Emergency tree works to maintain public safety provided the Executive Director, Heritage Victoria is notified within seven days of the removal or works occurring.
- Removal of environmental and noxious weeds.

Former Jetty Cargo Shed

Former Jetty Cargo Shed (VHR H0906) is included in the VHR as a Registered Place. Refer to Former Jetty Cargo Shed (VHR H0906) for full permit exemptions. Permit applications or exemptions approved under the registration for Former Jetty Cargo Shed (VHR H0906) are permit exempt under this registration.



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Inventory held by the Executive Director, of non-fixed objects integral to the place

Summary Inventory




Object number:	Object name:
VFHS 1848.1	Submarine telegraph cable, section
VFHS 1848.2	Submarine telegraph cable, section of inner core
VFHS 1848.3	Submarine telegraph cable, section of core
VFHS 1848.4	Submarine telegraph cable, section
VFHS 1849	Submarine telegraph cable, section of cable
VFHS 1850	Terminal post,
VFHS 2973	Collection of cast iron fastenings and tools. Bolts (9), nails (2), washer (1) , nuts (2); cold chisel (1) and plugging chisel (1).
VFHS 2974	Fragment of white ceramic lid
VFHS 2975	Key

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Objects Integral Information

Object number	Object name	Description of the nature of relationship between object and place	Sources of information	Size (where possible)	Inscriptions and markings (where possible)	Condition (if known)	Current location (if known)	Image information	Image
VFHS 1848.1	Submarine telegraph cable, section	Retrieved from Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.20cm	None visible	Heavily corroded	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 1848.2	Submarine telegraph cable, section of inner core	Retrieved from Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.7cm	None visible	Surface corrosion	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 1848.3	Submarine telegraph cable, section of core	Retrieved from Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.28cm	None visible	Surface corrosion	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 1848.4	Submarine telegraph cable, section	Retrieved from Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.28cm	None visible	Surface corrosion	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 1849	Submarine telegraph cable, section of cable	Retrieved from Low Head, Tasmania	Flinders District Historical Society	ca.35cm	None visible	Surface corrosion	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 1850	Terminal post,	From Telegraph Cable Station, Kennon Cove, Flinders Vic	Flinders District Historical Society	ca.10 x 5cm	None visible	Good	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	

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Object number	Object name	Description of the nature of relationship between object and place	Source/s of information	Size (where possible)	Inscriptions and markings (where possible)	Condition (if known)	Current location (if known)	Image information	Image
VFHS 2973	Collection of cast iron fastenings and tools. Bolts (9), nails (2), washer (1), nuts (2), 1 cold chisel (1) and plugging chisel (1).	Found under Flinders Cargo Shed during restoration	Flinders District Historical Society	Various	None visible	Surface corrosion	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 2974	Fragment of white ceramic lid	Found at Happy Valley site, Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.16 x 8cm	None visible	Cleaned	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	
VFHS 2975	Key	Found at Happy Valley site, Kennon Cove, Flinders, Vic	Flinders District Historical Society	ca.13 x 4 cm	None visible	Corroded	On display inside Cargo Shed	August 2021. Source: Flinders District Historical Society	

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Appendix 1

Heritage Council of Victoria determination (section 41)

The Heritage Council of Victoria is an independent statutory body that will make a determination on this recommendation under section 49 of the Act. It will consider the recommendation after a period of 60 days from the date the notice of recommendation is published on its website under section 41.

Making a submission to the Heritage Council (section 44)

Within the period of 60 days, any person or body with a real and substantial interest in the place or object may make a submission to the Heritage Council regarding the recommendation and request a hearing in relation to that submission. Information about making a submission and submission forms are available on the Heritage Council's website.

Consideration of submissions to the Heritage Council (section 46)

- (1) The Heritage Council must consider—
 - (a) any written submission made to it under section 44; and
 - (b) any further information provided to the Heritage Council in response to a request under section 45.
- (2) The Heritage Council must conduct a hearing in relation to a submission if—
 - (a) the submission includes a request for a hearing before the Heritage Council; and
 - (b) the submission is made by a person or body with a real or substantial interest in the place or object that is the subject of the submission.
- (3) Despite subsection (2), the Heritage Council may conduct a hearing in relation to a submission in any other circumstances the Heritage Council considers appropriate.

Determinations of the Heritage Council (section 49)

- (1) After considering a recommendation that a place or object should or should not be included in the Heritage Register and any submissions in respect of the recommendation and conducting any hearing into the submissions, the Heritage Council may—
 - (a) determine that the place or part of the place, or object, is of State-level cultural heritage significance and is to be included in the Heritage Register; or
 - (b) determine that the place or part of the place, or object, is not of State-level cultural heritage significance and is not to be included in the Heritage Register; or
 - (c) in the case of a recommendation in respect of a place, determine that the place is not to be included in the Heritage Register but—
 - (i) refer the recommendation and any submissions to the relevant planning authority for consideration for an amendment to a planning scheme; or
 - (ii) determine that it is more appropriate for steps to be taken under the Planning and Environment Act 1987 or by any other means to protect or conserve the place; or
 - (d) in the case of a recommendation in respect of additional land which has been nominated to be included in the Heritage Register as part of a registered place in accordance with section 32, determine that the land be included in the Heritage Register if—



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- (i) the State-level cultural heritage significance of the place would be substantially less if the land or any part of the land which is or has been used in conjunction with the place were developed; or
 - (ii) the land surrounding the place is important to the protection or conservation of the place or contributes to the understanding of the place; or
- (e) determine that the object is integral to understanding the cultural heritage significance of a registered place or a place the Heritage Council has determined to be included in the Heritage Register.
- (2) The Heritage Council must make a determination under subsection (1)—
 - (a) within 40 days after the date on which written submissions may be made under section 44; or
 - (b) if any hearing is conducted into the written submissions, within 90 days after the completion of the hearing.
- (3) A determination that a place or part of a place, or object, should be included in the Heritage Register may include categories of works or activities which may be carried out in relation to the place or object for which a permit under this Act is not required, if the Heritage Council considers that the works or activities would not harm the cultural heritage significance of the place or object.
- (4) If the Heritage Council determines to include a place in the Heritage Register, with the consent of the owner of the place, the Heritage Council may determine to include in the Heritage Register additional land of the owner that is ancillary to the place.
- (5) If a member of the Heritage Council makes a submission under section 44 in respect of a recommendation, the member must not take part in the consideration or determination of the Heritage Council.
- (6) The Heritage Council must notify the Executive Director of any determination under this section as soon as practicable after the determination.

Obligations of owners of places and objects (section 42)

- (1) The owner of a place or object to whom a statement of recommendation has been given must advise the Executive Director in writing of—
 - (a) any works or activities that are being carried out in relation to the place or object at the time the statement is given; and
 - (b) any application for a planning permit or a building permit, or for an amendment to that permit, that has been made in relation to the place but not determined at the time the statement is given; and
 - (c) any works or activities that are proposed to be carried out in relation to the place or object at the time the statement is given.
- (2) An advice under subsection (1) must be given within 10 days after the statement of recommendation is given under section 40.
- (3) The owner of a place to whom a statement of recommendation has been given must advise the Executive Director in writing of an application, permit or amendment if, before a determination under section 49 or 52 in respect of a place—
 - (a) an application for a planning permit or a building permit or for an amendment to that permit in relation to the place is made; or
 - (b) a planning permit or building permit or an amendment to that permit in relation to the place is granted.
- (4) An advice under subsection (3) must be given within 10 days after the making of the application or the grant of the permit or amendment.



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- (5) The owner of a place or object to whom a statement of recommendation has been given must advise the Executive Director in writing of the following activities or proposals if, before a determination is made under section 49 or 52 in respect of a place or object—
 - (a) any activities are carried out in relation to the place or object that could harm the place or object;
 - (b) any activities are proposed to be carried out in relation to the place or object that could harm the place or object.
- (6) An advice under subsection (5) must be given within 10 days after the owner becomes aware of the activity or the proposal, as the case requires.
- (7) If, before a determination is made under section 49 or 52 in respect of a place or object, a proposal is made to dispose of the whole or any part of the place or object, the owner of the place or object must advise the Executive Director in writing of that proposal.
- (8) An advice under subsection (7) must be given at least 10 days before entering into the contract for the disposal of the place or object.
- (9) The owner of a place or object who proposes to dispose of the whole or any part of the place or object before a determination is made under section 49 or 52 in respect of the place or object must, before entering into a contract for that disposal, give a copy of the statement of proposed contract, is to acquire the place or object or part of the place or object.

Owners of places and objects must comply with obligations (section 43)

An owner of a place or object to whom section 42 applies must comply with that section.

Penalty: In the case of a natural person, 120 penalty units;
 In the case of a body corporate, 240 penalty units.