

7 March 2016

Mr Tim Smith
Executive Director
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Re: Permit Application No. P24265

Dear Mr Smith,

I refer to the above application, to construct an eight-storey residential building with two levels of basement parking plus associated works.

There is significant concern and uncertainty within the community regarding proposed development at HM Prison Pentridge, recently demonstrated at a rally of 150 people held at the site in January this year, as well as a community meeting scheduled to take place on 10 March. Of primary concern is a lack of transparency in decision-making, and, in heritage terms, a lack of coordination in the design and conservation approaches proposed by the respective owners of the northern (Pentridge Piazza) and southern (Pentridge Village) parts of the site.

Furthermore, a number of key management documents remain unavailable to the public, including the Draft Masterplan prepared by Rothe Lowman (see below). While Heritage Victoria is responsible for assessing permit applications for individual developments at the site, it is important to ensure that these developments are in-keeping with site-wide policies. Therefore, the National Trust requests that these overarching management documents are made available to the public during the advertising period for individual applications.

Masterplan

The Heritage Impact Statement prepared by Lovell Chen (27 January 2016) notes that a draft Masterplan for the site has been prepared by Rothe Lowman, and was submitted to Heritage Victoria in October 2015. As this document has not been made public, it is not clear how it departs from the "Pentridge Village Design Guidelines and Masterplan", August 2009 (the Masterplan), an incorporated document under the Moreland Planning Scheme.

This Masterplan includes the following Design and Development Guidelines which apply to the subject site (p 18):

- *Development height in this area should respect the existing elements including G Division and the surrounding walls. New building forms should be sited predominantly west of the existing heritage buildings and not detract from the existing heritage buildings when viewed from Wardens Walk.*

- *New building forms should generally range in height up to 5–7 storeys dependent upon a detailed site analysis to allow consideration of how heritage elements and views of heritage elements will be conserved and integrated into detailed development design.*

Height & Impact on Significant Views

The National Trust submits that the proposed development, at 8-storeys, exceeds the height range indicated in the Masterplan, and does not respond appropriately to the site context, being adjacent to G Division, which is of primary significance to the site.

While the Masterplan for Pentridge Village allows for development on the subject site, it should be noted that the proposed development will be highly visible from significant views along Wardens Walk, as well as from Urquhart Street. As no renders have been provided with the application, it is difficult to assess the potential impact of the proposed development within the existing streetscape. However due to the vertical massing of the building, as well as the relatively small setbacks from the site boundaries, it appears that the proposed building is poorly integrated within the surrounding context.

This impact could be somewhat mitigated by stepping the mass of the building with the incorporation of a podium element, preferably not exceeding the height of the bluestone perimeter wall, with an increased setback for the tower element.

Perimeter Walls

The proposed development includes two openings in the southern wall (which is of primary significance to the site) which are larger than the openings in the previously approved development on this site. The Trust requests further detail regarding the “concrete pilasters in an abstract geometric form” that the “reveals” will be decorated with.

We further note that a design approach for wall cuts and apertures was developed as part of the “Pentridge Design Guidelines and Masterplan”, February 2014. Heritage Victoria should ensure that the approach to finishing wall openings is consistent across both the southern (Pentridge Village) and northern (Pentridge Piazza) parts of the site. This should be addressed in the development of the new masterplan for the site, with clear policies provided, and should also be reflected in the conditions of any permit granted for the current proposal.

The National Trust also questions the necessity of increasing the existing vehicular access by 1.5m. No justification for this increase has been provided in the Heritage Impact Statement, and any increase should be minimised.

Interpretation

The interpretation of this site is a key strategy for mitigating heritage impacts, however an interpretation strategy is not included in this proposal. The development of an interpretation strategy and implementation plan should be required as part of any permit conditions. As well as enhancing the historical significance of the place, undertaking interpretation at the site has the potential to positively engage the community in the redevelopment process.

The presence of Victoria’s first forensic psychiatric unit on part of the subject site (now demolished) represents a significant milestone in the state’s criminal and medical history, and should be

interpreted accordingly. Interpretation could include the collection of oral histories from former staff and inmates which would inform on and off-site interpretation,

Interpretation planning for the site should be done in accordance with the Australia ICOMOS Interpretation Practice Note (2013).

Conclusion

While the National Trust accepts that development at Pentridge is necessary to enable the conservation of historic fabric and a viable use for the site into the future, it is important for a balance to be achieved between development and conservation. With a number of historic buildings and areas of the Pentridge Village site currently remaining unused, and recent buildings abandoned in a state of partial completion, the transition of the ownership of the site to Future Estate represents an opportunity to reassess and redress this balance.

While the subject site demonstrates tolerance for development, the National Trust believes the current proposal constitutes an overdevelopment of the site, and that the permit application should be refused in its current form, or that strict permit conditions should be introduced to address massing, setback and interpretation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'F. Watson', with a long horizontal flourish extending to the right.

Felicity Watson
Senior Community Advocate