

23 December 2015

Mr Tim Smith
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Re: Permit Application No. P22644 HM Prison Pentridge

Dear Mr Smith,

I refer to the above application, to construct a residential apartment complex with a 19-storey and a 9-storey building plus associated works at the former HM Prison Pentridge site. The National Trust wishes to express its strong opposition to this proposal, following our objections to previous schemes for this precinct, namely our submissions to the Heritage Victoria dated 23 June, 2003, and 22 December 2008, responding to similar proposals at this site which did not come to fruition.

As with previous proposals for development on the site, little information is provided with the advertised application regarding how it fits in to the wider development scheme at the site. While the *Design Guidelines & Masterplan* (February 2014) provide an indication of proposed future development, the current application is lacking in detail about how the proposed tower would contribute to the ongoing maintenance and interpretation of the site.

The Design Guidelines & Masterplan (February 2014) incorporated by the City of Moreland on 17 July 2014, states that:"

Within 6 months of the Masterplan's approval, the master planning of the public realm and precinct wide infrastructure design will be developed. This includes the Landscape Design ... review and updating of the Conservation Management Plan; Heritage Interpretation Strategy and Management Plan

Nearly 18 months following the incorporation of the Masterplan, no revised Conservation Management Plan or Interpretation Strategy and Management Plan have been made publically available. These documents, which are mandated by the masterplan, should guide all development of the site, and inform a rigorous assessment of heritage impacts as well as the preparation of appropriate permit conditions for development. The National Trust submits that a decision regarding the current permit should not be made without this documentation, that if these reports have been prepared, that they are made publically accessible as part of this permit application process.

Absent rigorous and up-to-date conservation management policies to guide new development, the Heritage Impact Statement prepared by Bryce Raworth does not provide adequate justification for this proposal, or indicate how adverse impacts will be mitigated. We question the relevance of the claim in the HIS (p 13) that:

Many other approved and constructed developments of recent years in the inner metropolitan area also provide precedent for the juxtaposition of restored heritage fabric against taller, modern forms, and this can be seen as an emerging idiom within the Melbourne landscape in response to the pressure for increased density.

This scheme should be subject to a rigorous and robust assessment of heritage impacts examining the context of the site, which is undertaken from first principles, and does not regard the outcome as a *fait accompli*. The National Trust submits that the HIS provided with this application does not achieve this.

We also question the reliance on economic justification outlined in the HIS. The report states (p12) that

Assessing the proposal from a purely heritage policy-based, built form perspective, it is recognised that constructing a tall building on this or any portion of the site may be contentious. The justification for this proposal relies both on the economic argument, as well as the fact that the current scheme responds to the market demand for affordable living within close proximity to a government recognised activity centre.

The National Trust submits that no detailed data substantiating the economic case for this development has been provided with this application, and that this argument is irrelevant to the assessment of heritage impacts.

There are a number of other concerns with this proposal which the Trust would like to highlight as follows:

Building Height

The Trust previously advocated height limits on new infill buildings in the Pentridge redevelopment to ensure historic buildings and perimeter walls in the complex were given continued prominence. The Trust is on record stating that no building in the complex should be visible above the perimeter walls and that no building should be greater in height than the highest historic building on the site. Subsequently, the Trust has opposed previous developments for apartment towers on the Pentridge site because of the detrimental impact large scale, bulky development will have on the significant buildings and overall site.

The HIS argues that a tall building in this location is “seen as being necessary to the scheme insofar as they will help create the facilities required for a body corporate large enough to carry the costs of sustaining the site at viable premiums.” However, we note that no information has been provided with the advertised application to demonstrate how the revenue generated from this development would contribute to the conservation, maintenance and interpretation of heritage at the place.

Impact on Views

Any new development should seek to preserve and protect the views and the landmark qualities of the Pentridge site. Views from both within the prison site and from surrounding streets should be

considered and the basalt buildings and perimeter wall should continue to be prominent feature in streetscape.

The introduction of this tower on site will dominate the skyline of the Pentridge site, effectively dwarfing the significant buildings, wall and watch towers which together form the historic complex. As such, appreciation of the Pentridge complex is reduced as a result of the continued approval of such large visually intrusive structures dominating the skyline.

Further, we note that the Heritage Impact Statement prepared by Bryce Raworth does not assess the impact on views from the north of the site, and particularly from the hillside stretch of the Coburg Lake Reserve. The proposed buildings would be prominently visible from this significant viewline, degrading views of the historic buildings from this important vantage point,

Perimeter Wall Openings

The National Trust supports the reconstruction of the perimeter wall on Pentridge Boulevard, as identified in the 1996 Conservation Management Plan for the site.

However, the introduction of new openings to accommodate the vehicular and pedestrian traffic generated by the new development will result in the removal of significant fabric. The continual demolition of parts of this wall will result in the loss of continuity along the perimeter.

As noted in previous submissions, the Trust has concerns about the extent and nature of openings in the prison walls. It is recommended that the number of wall openings and widths be kept to a minimum and the formation of full height openings should be limited where arcaded openings are sufficient to provide access.

The proposed scheme also has an adverse impact on the corner watch tower, identified in the 1996 CMP as being of primary significance, dwarfing its current landmark status marking the corner of the prison site. Furthermore, the proposal lacks details about the conservation of this structure and whether it will be accessible to all visitors to the site, and not just residents.

Landscaping

The National Trust notes that the proposed landscaping outside the perimeter wall will have a significant visual impact on the bluestone wall and guard tower, with feature trees obscuring views to the bluestone wall from the south, and impacting on the visual dominance of the wall. We note that these impacts have not been addressed as part of the Heritage Impact Statement. While the National Trust accepts that feature plantings would provide amenity to residents, it is unclear how the proposed scheme fits into a wider landscape plan for the site, particularly further along Pentridge Boulevard outside the perimeter wall of B Division. The landscaping along Pentridge Boulevard should demonstrate consistency to reflect the historical continuity of the prison wall.

Conservation & Interpretation

While we object to the proposal in its current form, we would strongly advocate that if a permit is granted, that the construction of the towers be linked to tangible conservation and interpretation outcomes to somewhat mitigate the impact of this proposal, which is of unprecedented scale and will likely be the most visible building on the site. The former use of this site as a coir mat-making yard,

and the context of industry within the prison setting, should be interpreted as part of any development, and should be accessible to residents and visitors to the site. 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. Interpretation planning for the site should be done in accordance with the *Australia ICOMOS Interpretation Practice Note (2013)*.

Given the arguments raised in the body of this letter, we urge Heritage Victoria to refuse this Heritage Permit application. We believe that the proposal does not take account of the values of the prison and will further erode the cultural significance of this important complex.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Roser'.

Paul Roser
Senior Manager, Advocacy & Conservation