

10 February 2017

Point Nepean Master Plan
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Our Ref: B2401, L10072

Re: Point Nepean National Park Draft Master Plan

Dear Sir/Madam,

I am writing to you regarding the *Point Nepean National Park Draft Master Plan*, published in December 2016.

The National Trust of Australia (Victoria) (NTAV) is generally supportive of the Draft Master Plan, which includes extensive discussion of site context, themes, vision, interpretation strategies, activation strategies for the Quarantine Station and an implementation strategy. The adaptive re-use of the Quarantine Station is essential for ensuring the protection and conservation of Point Nepean's natural and cultural values for the enjoyment of future generations. We submit that this plan is worthy of bipartisan support, which is essential given the last ten years of indecision has slowed down progress of conservation works and finding a suitable, ongoing use for the site. Bipartisan agreement on the future of Point Nepean would give confidence to the community that the Master Plan would be supported and funded in the medium to long-term.

The National Trust makes the following comments in response to the *Point Nepean National Park Draft Master Plan* document, structured by headings utilised in the plan.

Executive summary

Vision

The vision for the park is given as:

'Ensure that the unique and special qualities of the park are revealed and protected and that the complex stories of the site as a cultural landscape are valued and expressed—turbulent ocean colliding with tranquil bay, 35,000 years of history, diverse, fragile and sacred landscapes, the dynamic Quarantine Station experience.'

NTAV submits that 'natural values' be added as part of the above vision. The addition of natural values is essential to prioritise the ongoing protection and celebration of the ecologies that are central to Point Nepean National Park. Although the natural values of the landscape and its ecology forms part of the vision for 'Caring for Country' on page 86, it should be a part of the broader holistic vision for the park.

Approach

NTAV is pleased that appropriate consultation has been undertaken with the Traditional Owners. It is clear that the knowledge and understanding gained through this consultation has informed the key initiatives of the *Point Nepean National Park Draft Master Plan* at a number of levels, and Parks Victoria can be commended for this aspect of the plan.

NTAV notes that once a planning permit is being developed for works on the site that a Cultural Heritage Management Plan would be triggered because of the Aboriginal sites present at Point Nepean. As there is no Registered Aboriginal Party (RAP) for the Point Nepean area, Aboriginal Affairs Victoria or the Victorian Aboriginal Heritage Council would be called upon to do the work on the Cultural Heritage Master Plan which is usually undertaken by a RAP.

Policy context

National park management plan

NTAV notes that on page 26 the Management Plan requires that the Master Plan undertake:

- *Economic analysis, feasibility studies and financial modelling of the Quarantine Station's future use*

While later in the document the section 'Implementation strategy' covers financial sustainability, a cost plan and a scenario financial analysis, in our view further detailed analysis should be undertaken prior to finalising the Master Plan.

Conservation Management Plans

NTAV supports the adaptive reuse of the buildings at the Quarantine Station. We are supportive of the prescription on page 27, taken from the *Point Nepean Quarantine Station Conservation Management Plan*, that adaptive reuse must "include measures to minimise any adverse impact on historical heritage values prior to commencement and during the life of the approved use." We submit that this statement be included in all documentation for the Expression of Interest process, and strictly adhered to during the tenure selection process.

Initiatives not reflected in the park management plans

NTAV supports the increase in access to the park generally and the minimisation of the park's road infrastructure. It is believed that this will facilitate greater visitor engagement with the natural and cultural values of the Point Nepean National Park. Strategies should be developed to ensure that access is carefully managed, and that increased access across the site does not adversely impact on the natural and cultural values of the place.

Revealing stories

Interpretation strategy

NTAV welcomes the holistic approach that Parks Victoria has taken to developing an interpretation strategy for the site. The inclusive nature of the 'removing fences – shared cultural landscape approach' would have positive benefits for the community in terms of telling the layers of complex histories that the site holds. The integration of voices, stories and knowledge from Traditional Owners across all areas of the park is strongly supported by NTAV. The intention to restore and interpret the Fumigation & Boilerhouse area is positive, given that the machinery and infrastructure of these buildings make them unsuitable for adaptive reuse. We would welcome interactive displays within these buildings, offering a deeper interpretation of the site that is family friendly. Retaining and conserving the original luggage tramway rails tell an important story about the use of the site historically and should be pursued as part of the interpretation strategy.

Quarantine Station

We note that the interiors of many buildings at the Quarantine Station are not included in the Victoria Heritage Register (VHR) Statement of Significance. As such these interiors are unlikely to be adequately protected in the event of a permit application for alterations. Although the interiors may not meet the threshold of state significance for inclusion on the VHR citation, many of the interior features are still of heritage significance and highly valued by the community. These features often contribute to the visitor's ability to read the story of the Quarantine State through its buildings. One such example is the First Class Dining Hall, which could be converted to a function venue while retaining the parquet flooring, fireplaces and fittings. NTAV encourages Parks Victoria to consider the suitability of particular buildings within the Quarantine Station for particular uses that would ensure that the interior heritage features can be integrated into the detailed design for adaptive reuse. Such considerations should be taken into account by the activation scenarios. For instance, Scenario 2 proposes an education and research focused activation of the First Class Dining Hall, which may see some key interior features fully or partially removed. As such the suitability of adaptive reuse might be usefully employed as a 'criterion' to be considered by '10.8 Activation scenario criteria' evaluation on pages 122-123. This would reiterate the prescription given on page 27 of the Master Plan, that adaptive reuse must "include measures to minimise any adverse impact on historical heritage values prior to commencement and during the life of the approved use."

Core deliverables by Parks Victoria

With regards to car parking, jetty, utilities connections and event infrastructure as outlined on page 109, NTAV advocates for conservation outcomes to be balanced with the need for the new and improved infrastructure required to facilitate activation of the Point Nepean National Park site. Utility/service lines to facilitate heritage building use should be underground where possible. When upgrading paths, barbeque, picnic facilities and playscapes, vegetation removal, including native vegetation and mature planted trees, should be prevented. Succession planning for existing mature planted trees could also be undertaken in the next 10-20 years. Detailed implementation plans for indoor and outdoor events should be developed to increase accessibility and capacity while protecting the significant natural and cultural values of the place.

Partnerships

NTAV considers that partnerships between Parks Victoria, the community and the private sector are essential to ensure the long term sustainability and protection of the Quarantine Station. NTAV commends Parks Victoria for the strong list of activation strategies and the aspirational outcomes proposed in this section of the Master Plan. Parks Victoria might also consider Government agencies such as Creative Victoria as potential partners for activation of the site.

Design and development parameters

New development on the Quarantine Station is an issue of key concern to the community. While NTAV recognises that new infrastructure will likely be required at the Quarantine Station to ensure long term sustainability of the site into the future, we submit that the site has limited capacity to support the establishment of additional facilities without adversely impacting on its cultural and natural heritage values. As such, NTAV supports the intention stated on page 126 that “the net footprint of new buildings should not exceed the net footprint of demolished buildings at the time of, and reflected in, the 2008 CMP, and new buildings are not permitted outside the Quarantine Station.” New buildings should match the scale of existing buildings, be sensitively located, and vegetation removal should be minimised, with native vegetation and mature planted trees protected as part of the development process. It is suggested that height controls are applied to the Quarantine Station to guide future development.

With respect to the new buildings suggested on pages 126-127, NTAV submits that further detail should be included in the Master Plan to provide a clearer indication of the conditions under which new building infrastructure will be required. Any proposed new development on the site should be exhibited with adequate documentation and detailed design that outlines specific requirements met by these buildings that could not be achieved through adaptive reuse of existing heritage buildings.

On page 127 reference is made to preliminary analysis undertaken by TZG in the 2010 Master Plan regarding adaptive reuse of the Quarantine Buildings, stating “the purpose of this analysis was to establish the potential capacity of each building for adaptive reuse within the framework of the policies of the CMP.” This analysis may provide useful guidance regarding appropriate possible uses of the Quarantine Buildings. As such, it may be useful to make this information available as part of the Expression of Interest process for the site.

Governance framework

NTAV supports Parks Victoria’s position that “important heritage sites with potential commercial opportunities require governance arrangements with clarity of purpose and systems to deliver transparency and accountability in their operations.” As such, detailed plans for governance at the Quarantine Station should be developed and made public prior to any Expression of Interest process. NTAV commends Parks Victoria for conducting a precedent study to begin informing this process. Banff National Park, in Canada, particularly its Banff Centre for Arts and Creativity, could be a useful addition to this list, as a site that integrates the arts as a means for interpretation of the natural and cultural assets of the site.

Conclusion

NTAV takes this opportunity to commend Parks Victoria on the scope and focus of the *Point Nepean National Park Draft Master Plan*. NTAV strongly supports the adaptive reuse of the Quarantine Station and considers that this is key priority for the site to be sustainable into the future. Bipartisan support of this Master Plan is vital to ensure that this valuable heritage asset for the state of Victoria is protected well into the future.

Should you have any questions regarding this submission, I can be contacted on (03) 9656 9823.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jessica Hood', written in a cursive style.

Jessica Hood

Community Advocate, Environmental Heritage