

15 April 2016

Ms Lauren Lees  
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**Re: Application for an Amendment to a Planning Permit—MPS/2011/12637/B**

Dear Ms Lees,

I refer to the above application, to seek an amended planning permit 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, demonstrated at a rally of 150 people held at the site in January this year, as well as at a community meeting on 10 March with over 100 attendees which resulted in the establishment of the Pentridge Community Action Group.

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. We note that following the gazettal of Amendment C123, Responsible Authority status has been handed back to Council for the majority of the site, which the Trust hopes will result in more coherent and transparent decision-making. Further, we acknowledge Council's continued efforts to seek good planning outcomes at Pentridge, reflected in recent actions and resolutions by Council pertaining to this site.

That notwithstanding, a number of key management documents remain unavailable to the public, including the Draft Masterplan prepared by Rothe Lowman (see below). As Council 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 be made available to the public during the advertising period for individual applications.

**Masterplan**

A Heritage Impact Statement prepared by Lovell Chen (27 January 2016) included in the documentation for Heritage Victoria Permit P24265 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. 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. We note that the proposed ground floor setbacks from the site boundaries have significantly decreased compared to the existing permit.

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 heritage significance to the site) which are larger than the openings in the previously approved development on this site. The Trust submits that the concrete pilasters proposed to decorate the wall openings are visually intrusive and have a detrimental impact on the heritage significance of the wall.

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. Council 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 advertised documentation, and any increase should be minimised.

## **Interpretation**

Historical interpretation has the potential to contribute to the mitigation of heritage impacts at this site, 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. We note that under a Section 173 Agreement on the title of this site, the preparation and implementation of a Heritage Interpretation Strategy is required. The Trust supports council's efforts to confirm Future Estate's obligations under this agreement and seek clarification about progress on interpretation planning, as discussed at a recent Council meeting on 13 April.

Best practice heritage interpretation requires it to be incorporated into the design of the building and landscaping, rather than retrofitted at a later date, and should therefore be considered as part of the current proposal.

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,



Felicity Watson  
Senior Community Advocate