

10 February 2017

Mr Tim Smith  
Executive Director  
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**Re: Permit Application No. P26010 VHR1551 HM Pentridge Prison—B Division**

Dear Mr Smith,

We refer to the above application, to construct an 18-level residential and hotel tower to the southwest of B Division; adaptive reuse of B Division and the B Division annex; openings in the historic bluestone walls; and the redevelopment of the south-east exercise yard.

**Context**

In responding to this application, we acknowledge the significant ongoing community concern regarding the scale of proposed development at HM Prison Pentridge. The National Trust of Australia (Victoria) has long advocated for strict height limits on new development in this precinct to protect the landmark qualities of the prison, as well as significant views to the site, reflected in our submission of 22 December 2008 concerning a previous development plan for B Division, as well as subsequent submissions to Heritage Victoria.

In preparing this submission however, we also acknowledge that the development contemplated in this proposal is generally in accordance with the “Pentridge Village Design Guidelines and Masterplan”, August 2009 (the Masterplan), an incorporated document under the Moreland Planning Scheme. We further acknowledge that despite continuing community advocacy to review this Masterplan, which has been supported by the NTAV, decision-making for this site is currently guided by the Masterplan.

In previous submissions, we have called for greater transparency in the permit application process, including the provision of relevant details from the Conservation management Plan for the site, details regarding site-wide interpretation, as well as documentation regarding economic feasibility. We therefore acknowledge the level of detail provided with this application, which is significantly more comprehensive than previous applications. We also acknowledge that the Applicant has significantly progressed conservation works required by Permit P20564, issued on 30 May 2014.

**Interpretation**

We appreciate the opportunity to review the Former HM Prison Pentridge Heritage Interpretation Masterplan prepared by SHP (2013, updated 2016), and it is positive to see the development of an integrated site-wide approach to heritage interpretation.

We encourage Heritage Victoria to ensure consistency in the approach to heritage interpretation across the northern and southern portions of the site. While the site has multiple owners, it can—and should—be understood as a whole. This requires consistency in the approach to interpretation across all parts of the site, which can go some way to mitigating the significant impacts proposed development will have on the heritage value of the site, and the fragmentation of the built and urban form. We would welcome the opportunity to assist with the facilitation of discussions between relevant landowners to develop an agreed approach across the site.

We also take this opportunity to provide some feedback on the Interpretation Masterplan by SHP. Of significant concern is the omission of any acknowledgement of the Aboriginal history of the site—both prior to the establishment of the prison, and throughout its history as a penal institution. In interpreting any site of Pentridge Prison, it is important to acknowledge that the history of the site predates the settlement of Europeans by many thousands of years. With respect to the site's penal history, Aboriginal people have also been historically over-represented in prison populations, with Pentridge Prison no exception. This is therefore a key historical theme which warrants further research and consultation. We note that a significant mural by Aboriginal artist Ronald Bull is located on the southern portion of the site, which is currently in urgent need of conservation works, highlighting the important place of Aboriginal people in the history of this site.

We strongly advocate for further investigation and consultation with Traditional Owners to be undertaken to inform how the site's Aboriginal heritage values can be incorporated into the interpretation and programming for the site. As part of the NTAV's commitment to Reconciliation, we are currently undertaking an Aboriginal Cultural Heritage Survey of the Old Melbourne Gaol and City Watch House so that we can better acknowledge and tell the stories of Aboriginal and Torres Strait Islander peoples. We would welcome the opportunity to share information with Shayher and SHP about this process, with the guidance of the NTAV's Aboriginal Advisory Committee, to advance the recognition of Aboriginal heritage values at Pentridge Prison.

We also note the lack of detail in the Interpretation Masterplan relating to the history of the site in the second half of the twentieth century and up to the closure of the prison in 1997. While the remaining historic fabric at the site interprets the early phases of history at the prison, it is also important to acknowledge the later phases of history at the site, including the interpretation of significant fabric which has been demolished such as the Jika Jika high security unit. While the physical evidence of much of Pentridge's more recent history has largely been stripped from the site, it is important to acknowledge this history through interpretation, and not to strip the presentation of the site back to an arbitrary moment in time. A potential theme for exploration could be the challenges of adapting historic institutional buildings to changing philosophies of incarceration.

We also note several other historic themes which would make a positive contribution to site interpretation, such as those outlined in the submission of Prof. Michael Hamel Green in response to this permit application, including political prisoners, and the criminalisation of homosexuality.

While the Interpretation Masterplan indicates that it was informed by a "visioning workshop" with key stakeholders, it is unclear which stakeholders were consulted, and whether input has been sought from interest groups and individuals in the community who have significant connections with the place. Given continuing community concern regarding this development, further consultation around the interpretation of the site represents a significant opportunity for the Applicant to strengthen community relationships and meaningfully interpret the significance of the site,

offsetting somewhat the significant heritage impacts associated with the proposed development. While we acknowledge the efforts made by the Applicant to engage with the community through the establishment of the Pentridge Residents and Community Group, we strongly advocate for specific and targeted community consultation to be undertaken to further inform site interpretation.

### **Public Access**

This application does not indicate how public access will be provided to the heritage interpretation wing of B Division, the south-east exercise yard, and gallery space. Provisions for regular and ongoing public access should be included as a condition of any permit, and be required of any future owners or tenants.

### **Perimeter Walls**

We note the following statement in the Heritage Impact Statement (p 28):

*The architectural treatment of the proposed openings develops and extends the types of openings proposed as part of the site-wide openings strategy for the Public Realm.*

As outlined in previous submissions, we submit that the approach to finishing wall openings should be consistent across both the northern (Shayher) and southern (Pentridge Village) parts of the site. We question the need to “develop and extend” the types of openings—all openings should be finished according to a consistent and agreed policy.

### **Removal of B Division Stairs**

As noted in the Heritage Impact Statement prepared by Bryce Raworth Pty Ltd, “Five new flights of stairs ... are proposed to replace the existing four staircases in B Division”. We submit that the original internal staircases make a significant contribution to the character of the interiors, with their removal therefore constituting a significant heritage impact. Input should be sought from a qualified Conservation Architect to ensure the design and placement of new stairs is sympathetic and minimises impacts.

### **Conservation Works**

We support recommendations submitted to Moreland Council by the Director, Planning and Economic Development outlined in the 8 February Moreland Council meeting agenda, item DED6/17, which calls for the following:

- ii. *A plan detailing how the reconstruction of those parts of the annexe to be demolished and reconstructed will be carried out.*
- iii. *Restorative works to B Division and the Be Division Annexe building as set out in both the 1996 and 2016 Conservation Management Plans.*
- iv. *Details of the finishes and treatments to the wall cuts as anticipated by the Masterplan, including heritage interpretation, lintel highlights, expressed or frame apertures.*
- v. *That any development within the south east exercise yard accord with the works detailed in the Heritage Interpretation Plan prepared by Sue Hodges Productions, noting that there are discrepancies between this document and the proposed landscape plans.*

## 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 development at the site proceeding in accordance with the established Masterplan, we believe there are significant opportunities to mitigate the substantial heritage impacts associated with this proposal by further community engagement relating to interpretation, and ensuring public access to heritage interpretation at the site. Thank you for the opportunity to make this submission.

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

Felicity Watson  
Advocacy Manager