

15 September 2025

Senior Heritage Officer (Permits)  
Heritage Victoria  
GPO Box 2392  
Melbourne VIC 3001

Attn: Jessica Antolino

Dear Jessica,

**RE: Victorian College for the Deaf (H2122)  
Response to Request for Further Information (P35220)**

## **1.1 BACKGROUND**

This Letter has been prepared in response to Heritage Victoria's Request for Further Information (RFI) for the Permit Application (P35220) for proposed works at the Victorian College for the Deaf (the subject site), located at 597 St Kilda Road, Melbourne.

The subject site is included on the Victorian Heritage Register as H2122, Deaf Children Australia (Former Victorian Deaf and Dumb Institution). The site comprises a collection of buildings that are generally located to the north and east of the allotment, with landscaped and open spaces in the west and south. Buildings include the 1866 Bluestone Building (B1), which was the original school building and is now largely occupied by Deaf Children Australia; the 1928 School Building (B2) now used as the main school building by the Victorian College for the Deaf; and the Administration Building to its east; the Trade Block (B3) in the south-east corner, constructed c.1940; the W.D. Cook Pre-School building (B4).

Pre-application advice regarding the Victorian College for the Deaf was sought on 3 December 2021. Further pre-application advice was sought again in relation to the proposed works (P35220, dated 6 June 2024), with the scope of works, including the general footprint and massing of the proposed new build, included. The heritage planning officer did not raise any major issues with the proposal.

In June 2025, **NBRS** prepared a Heritage Impact Statement and submitted a Permit Application to Heritage Victoria via Heritage Desk for the proposed works at the place.

Heritage Victoria has issued a Request for Further Information (RFI), dated 19 August 2025, regarding the Permit Application, with several items outlined for further information to be provided.

The RFI issued requested:

- Further information addressing the reasonable and economic use of the heritage place (s101(2)(b)) to substantiate that the proposed footprint and scale of the new built form (N Block) are essential to meet the functional and operational needs of the Victorian College for the Deaf.
- Further information and documentation regarding the extent of works to the main entrance gate and how this relates to the historical presentation of this part of the place.
- Concerns were raised regarding the use of exposed aggregate in the landscaping located in close proximity to heritage buildings at the site.

This Letter will address the above requests made by Heritage Victoria in their RFI.

The drawings provided by NBRS and 3 Acres Landscape Architecture have been updated to respond to Heritage Victoria's RFI. The current plans referred to in this Letter are:

- NBRS, 'Front Entry Gate', *Victorian College for the Deaf*, Drawing No. VCD-NBRS-ZZ-DR-A-5300, Iss. 1, 04.09.2025
- NBRS, 'Site Security/Fence Plan', *Victorian College for the Deaf*, Drawing No. VCD-NBRS-ZZ-DR-A-0500, Iss. 7, 04.09.2025
- 3 Acres Landscape Architecture, 'Cover Sheet', *Victorian College for the Deaf*, Drawing No. 000, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Key Plan', *Victorian College for the Deaf*, Drawing No. 001, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 1', *Victorian College for the Deaf*, Drawing No. 201, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 2', *Victorian College for the Deaf*, Drawing No. 202, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 3', *Victorian College for the Deaf*, Drawing No. 203, Rev. 3, 09.09.2025

## 1.2 REASONABLE AND ECONOMIC USE OF THE HERITAGE PLACE

Heritage Victoria has requested that additional information be provided regarding the reasonable and economic use of the site, which, if refused, would affect these uses of the site. Heritage Victoria has specifically requested that this additional information address how the footprint and scale of the proposed N Block are required to meet the functional and operational requirements of the Victorian College for the Deaf.

### Reasonable Use

The heritage place is significant for its historic and continuing association with the teaching of deaf children. The site was first used for teaching deaf children in 1866, and continues to operate as a school for deaf children into the present day. The Victorian College for the Deaf educates and supports deaf people to access employment, build connections within their community, and engage with the wider public. The ongoing use of the site as a school for deaf children is a reasonable use of the site, one that is underpinned and supported by the significance of the place. The Victorian College for the Deaf is of social significance for its continued association with the teaching of deaf children. Maintaining and supporting this use is not only reasonable but also essential to preserving the place's social significance.

As of 2025, the Victorian College for the Deaf supports a student population of 75 and a staff of 63 (35 of whom work at the school full-time), providing education to students who range from Foundation through to Year 12. In order to continue to operate as a deaf school, one that provides the opportunity for deaf people to access employment opportunities in a rapidly changing working environment and shifting social milieu, the Victorian College for the Deaf is required to increase and update its teaching facilities and offerings to students to meet these needs. Currently, there are not enough classrooms on-site, with the school required to bus students off-site to attend curriculum-based classes. Classrooms for food technology, art classes, and indoor assemblies are required on-site. While some of these spaces will be relocated to the 1928 School Building, these spaces cannot all be incorporated into the current buildings (being the Block A 1990 Administration Building and Block B 1928 School Building) without more substantial intervention into the significant fabric or the construction of additional levels to existing buildings. A media room and a production room are also proposed to expand the educational offering and learning opportunities of deaf students, which will in turn increase the available employment opportunities for deaf students in a shifting employment market. As per the calculations of the Victorian School Building Authority, the proposed N Block will allow for the school to support a student population on site of between 73-84 students. With its

student population of 75, the proposed N Block is required to meet current student numbers at the school. Without the proposed N Block, the school cannot continue to operate or function on site with its current student and faculty population.

It is reasonable to update school facilities or to build new facilities in order to provide students with the learning spaces, technology, and services required to ensure that they can thrive once they leave the school. Providing appropriate and updated facilities ensures that the place can meet the students' needs now and into the future, which is essential for ongoing enrolments and the site's continued use as a school for deaf children. Updating school facilities supports the place's social significance and its historical and ongoing use.

The height and footprint of the proposed N Block directly correlate with the needs of the Victorian College for the Deaf to operate with its current student and faculty numbers, as well as its projected future needs. The height and footprint of the proposed N Block are based on the standards as set out by the Victorian Schools Building Authority (VSBA) in their building quality standard handbook, which outlines how schools are to be designed. The area allocation for each school is completed by the VSBA based on the school's needs, curriculum, existing assets, and future growth potential. The proposed N Block measures 860sqm and has been designed and assessed according to the VSBA area allocation; due to the nature of the school, it is required to support a student ratio of 1 teaching staff to 4 children plus administration, allied health, and IT. A hall, sports area/performance space, and media rooms are standard facilities common to schools and are not currently provided at the site. If the proposed N Block is not constructed, the school would not be able to meet its current and future learning curriculum needs. As such, the school would be required to consider alternative options, such as the removal of the school from the site.

A refusal of the proposed works would adversely impact the reasonable use of the place as a school for the teaching of deaf children by preventing the school from providing the classrooms required to support their current students on site. It would also adversely impact the school's current and future curriculum by preventing it from providing facilities that are common in a mainstream school environment and are required to bridge the equality gap for its students. Further, a refusal would risk both the historical and social associations that contribute to the significance of the place, as it would increase the likelihood of the school vacating the site.

### Economic Use

To continue to operate as an economically viable school, the Victorian College for the Deaf will need to increase its available on-site facilities and educational offerings; the school currently does not have enough classroom spaces to support its current student population of 75 and staff cohort of 63 (with 35 staff being employed full-time at the site), nor its projected future needs, resulting in additional costs to the school to provide off-site classes.

Currently, the Victorian College for the Deaf is required to bus students to off-site locations to undertake curriculum-based classes, costing the school approximately \$15,000 a year to transport students to these classes. This is not an economically viable long-term solution for the school. To overcome this, the Victorian College for the Deaf requires additional on-site classrooms for its students and staff.

To meet the current classroom requirements on-site, the Victorian College for the Deaf will need to construct additional classrooms for its students, as the current number of students and staff is not supported by the existing rooms in the 1928 School Building (Block B) and the 1990s Administration Building (Block A). The proposed N Block will allow the Victorian College for the Deaf to support a student population of between 73-84 students on site, as per the calculations of the Victorian School Building Authority; the current number of students at the school is 75. The current proposal will

address the issue regarding the lack of available classrooms for students and will provide a viable solution to the school that is economically sustainable.

The proposed height and footprint of the N Block directly correlate with the additional spaces required by the school to operate from the site with its current student capacity and to provide facilities that are standard within any school environment. The design of the N Block is based on the building quality standard handbook produced by the Victorian School Building Authority (VSBA), which outlines how schools are to be designed. The area allocation for the school was completed by the VSBA and was based on the school's needs, curriculum, existing assets, and growth potential. In the Conservation Management Plan prepared by NBRS for the place, the location of the proposed N Block was identified as the most suitable for the construction of a building (Figure 1). Currently, the school does not have a large indoor sports area or performance space for learning, facilities that are standard and expected at school sites. These facilities are required by the school to meet the current and future needs of the school's curriculum on-site. In order to remain economically viable, the Victorian College of the Deaf is required to ensure it provides relevant and up-to-date facilities that ensure that the curriculum can be taught on site or risk parents enrolling their children elsewhere.

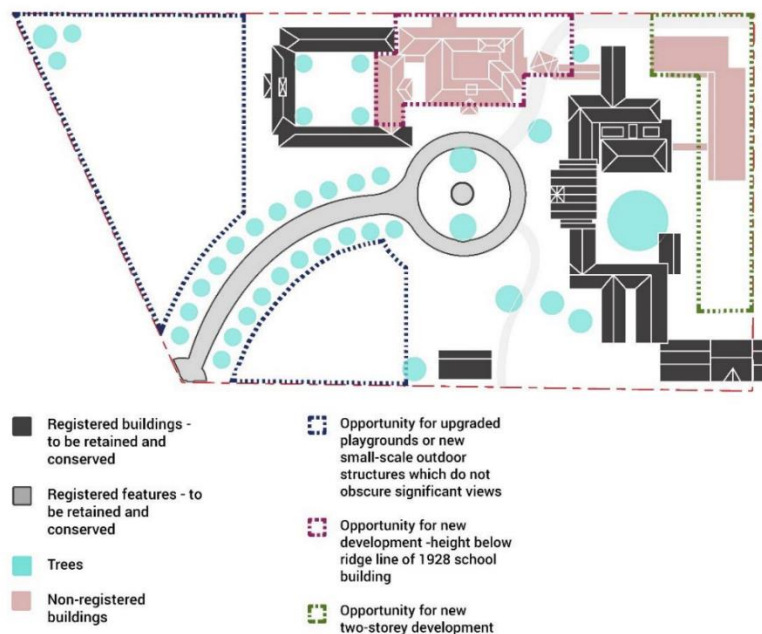


Figure 1 (left): Diagram from the Conservation Management Plan for the Victorian College for the Deaf showing the location of appropriate development at the site. (Source: NBRS 2021)

If the proposed N Block could not be constructed, the Victorian College for the Deaf would be required to continue to bus students off-site to attend curriculum-based classes. This is not a viable economic option for the school, particularly as the school continues to grow. The proposed N Block is required to support the current and projected future needs of the school and its curriculum; if these facilities cannot be provided on-site, the school may need to consider moving to another location.

### 1.3 EXTENT OF WORKS TO THE MAIN ENTRANCE GATE

The Request for Further Information (RFI) issued by Heritage Victoria sought clarity on the extent of the proposed works to the main entrance gates and how this relates to the historical presentation of the place. The RFI provided by Heritage Victoria directly refers to Permit Exemption P32524, which was issued to Deaf Children Australia and was intended to positively return the entrance to its 1897 appearance. NBRS were not able to view the stamped drawings without permission from Deaf Children Australia. Deaf Children Australia provided drawings to NBRS prepared by architects



Howden and Wardrop Pty Ltd, dated between September 1999 and January 2000. As such, our response is based on the information that was available to NBRS, which is limited.

Since 2021, when NBRS became involved with the site, the main entrance gate has undergone work, with the cast iron capitals and gates reinstated and the main entrance painted white. A photographic montage of these works over this time period has been included below for reference (Figure 2, Figure 3, and Figure 4). Photographic images of the main entrance gate as it currently appears are provided in Figure 5 and Figure 6.



Figure 2: Image of the main entrance gate and fence, taken in May 2021.



Figure 3: Image of the main entrance gate and fence, taken in December 2022. (Source: Google Maps)



Figure 4: Image of the main entrance gate and fence, taken in February 2024.



Figure 5: Image of the main entrance gate and fence, taken in 2025.



Figure 6: Image of the main entrance gate and fence, taken in 2025. An inconsistency in the fence pickets is indicated by a red arrow. The proposal includes the addition of 1 (one) picket to fix this inconsistency in the fence.

The current gate at the main entrance is not compliant with the Victorian School Building Authority and is a safety risk, as there are large openings in the gate that children can climb through. Currently, there is metal safety fencing located at the gate to prevent children from climbing through; however, this is not a viable long-term solution. Further, there are inconsistencies in the fence pickets at the left side of the gate (Figure 6), which is not an accurate or appropriate outcome and does not match the earlier appearance seen in 2021 (Figure 2). Improving this inconsistency will improve the visual appearance of the entrance fence.

The proposed extent of works to the main entrance gate will only include the introduction of white timber palings to the gate to cover the large openings and the addition of one picket to the existing fence to fix the gap (shown in Figure 6). The picket to be added to the entrance fence will match the existing in terms of colour, size, and materiality. The extent of the proposed works to the main entrance gate is shown in NBRS, 'Front Entry Gate', *Victorian College for the Deaf*, Drawing No. VCD-NBRS-ZZ-DR-A-5300, Iss. 1, 04.09.2025. A caption regarding the addition of a picket to the existing fence is noted in NBRS, 'Site Security/fence Plan', *Victorian College for the Deaf*, Drawing No. VCD-NBRS-ZZ-DR-A-0500, Iss. 7, 04.09.2025

No other works are proposed to the main entrance gate, which will retain its existing timber gateposts with cast iron capitals, and its timber rails and braces.

The white timber pickets proposed to be introduced to the gates will match the timber pickets in the existing fence located on either side of the gateway. The proposed pickets are simple and sympathetic in design to the existing fabric and will have minimal impact on the heritage significance and current views of the site from the main entrance, whilst preventing children from climbing through the gate. Repair works are proposed to remedy an inconsistency in the gap of the existing picket fence.

Without access to the stamped drawings relating to P32524, NBRS is not able to confirm how the current appearance of the fence compares with that of the earlier exempt scope of work. The current proposal is based on the existing conditions only and seeks to rectify the fence and make it compliant.

These works are not intended to introduce an earlier historical representation to this part of the site, but rather to be a sympathetic and discreet alteration that will improve child safety at the site. The proposed alteration is intended to be the least impactful and will not disrupt the presentation of this part of the place.



## 1.4 EXPOSED AGGREGATE IN THE LANDSCAPING

Heritage Victoria raised concerns regarding the proposed use of exposed aggregate in close proximity to heritage buildings or elements at the site. Heritage Victoria has recommended that an alternative material that is already present at the place be considered instead.

Following this recommendation, the landscaping plans have been amended to replace the exposed aggregate with asphalt. The revised landscaping plans are:

- 3 Acres Landscape Architecture, 'Cover Sheet', *Victorian College for the Deaf*, Drawing No. 000, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Key Plan', *Victorian College for the Deaf*, Drawing No. 001, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 1', *Victorian College for the Deaf*, Drawing No. 201, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 2', *Victorian College for the Deaf*, Drawing No. 202, Rev. 3, 09.09.2025
- 3 Acres Landscape Architecture, 'Surface Treatment Plan 3', *Victorian College for the Deaf*, Drawing No. 203, Rev. 3, 09.09.2025

The asphalt proposed is a sympathetic material that is an appropriate alternative to the exposed aggregate. Asphalt is a historic paving material that is already present at the site, including in close proximity to the heritage buildings and elements (Figure 7 and Figure 8). This approach ensures a consistent and historically appropriate ground surface and minimises the material palette for hard landscaping across the site.



Figure 7 (above): Exterior view of the rear (east) elevation of the 1866 Bluestone Building, with asphalt used to the hard landscaping in close proximity to a heritage building.



Figure 8 (right): Exterior view of the courtyard in the 1928 School Building, showing the use of asphalt to the hard landscaping.

We trust that the above adequately responds to the RFI and provides the required information in order to complete the application assessment. If you have any further questions, or wish to discuss these matters in more detail, please don't hesitate to get in touch.

We look forward to your future correspondence on this application.



Dr Elizabeth Offer  
Heritage Consultant  
**NBRS**  
15 September 2025