

MEMORANDUM

TO Heritage Victoria FROM Lovell Chen
 RE P40433 – Request for further information DATE 22 May 2026

We refer to the above registered place and write on behalf of the applicant, Academy of Mary Immaculate, Fitzroy (AMIF). Permit application P40433 was submitted by Lovell Chen on behalf of AMIF on 16 March 2026, seeking approval for alterations and additions to the exterior and interior of buildings within the area of greater sensitivity across the AMIF campus. This correspondence has been prepared to address a request for further information received from Heritage Victoria on 29 April 2026.

The RFI correspondence requested the following:

Options analysis - demolition

Pre-application advice noted that any application must include a thorough options analysis regarding elements proposed for demolition—this is lacking from the application. This analysis should clearly show that retaining these elements is not feasible and that their removal will, overall, cause the least harm while allowing for an outcome that supports the continued use of the site as a school, both in its current and historic context. See pre-application advice letter for further detail [see below].

Interwar verandah (western elevation Goold residence)

It is acknowledged that this element is a later addition. However, clarification is sought as to the necessity of widening the existing window openings. The justification provided—improved daylight and functionality to the 1850s Goold residence—is not clearly demonstrated.

As noted in the Heritage Impact Statement submitted with the application, the early construction of the Goold residence is already externally legible, and it is not evident that widening the openings is required to improve this understanding. Further, enlarging the openings to reflect early proportions risks confusing the historical arrangement, given these were historically window openings rather than doors. On this basis, retention of the existing verandah opening configuration is strongly preferred to avoid unnecessary change.

As related to consideration of options, the pre-application advice (dated 25 February 2025) noted:

[...] any application must include a thorough options analysis regarding elements proposed for demolition. This analysis should clearly show that retaining these elements is not feasible and that their removal will, overall, cause the least harm while allowing for an outcome that supports the continued use of the site as a school, both in its current and historic context. The proposed demolition of the former laundry/kitchen addition (pre-1897 but with later additions) and the internal bluestone stair (1868) in the addition to Goold's residence (now staff spaces) may be considered if a comprehensive proposal is provided that includes archival documentation, as well

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as plans for salvaging and reusing the bluestone. This proposal should also demonstrate that these are the only viable options in order to provide the necessary upgrades.

1.1 Response

1.1.1 *Rationale for the proposed design interventions*

As noted in the Heritage Impact Statement (HIS), the departure of the Sisters of Mercy and the transfer of the former convent building to the AMIF is a significant moment in the history of the AMIF campus. It is also a notable opportunity to sustain the viability of the campus as a place of education – a function for which it has been used, unbroken since 1853.

The AMIF campus is subject to significant spatial constraints with limited available space within the campus and no capacity for expansion beyond its boundaries. The campus has evolved incrementally since the mid-1850s through a series of ad hoc additions and modifications to support evolving requirements. This piecemeal pattern of development has resulted in a complex comprising of buildings and additions from multiple periods with correspondingly varied levels of significance. This pattern of development has also resulted in limited outdoor space, non-compliant circulation, inefficient spatial arrangements and fragmented connections between buildings. Collectively, these issues limit the viability of AMIF as a contemporary educational campus.

1.1.2 *Options analysis – demolition*

The transfer of the former convent to the school presents a one-time opportunity to establish a coordinated approach to the planning of the campus.

During concept development, AMIF and the consultant team tested a range of options for the proposed works (discussed below). These options also sought to achieve the following objectives:

- provision of equitable access including vertical circulation to the upper levels of the heritage buildings and improved circulation within the campus;
- rationalised wayfinding and connectivity across the campus;
- improved functional planning to support ongoing educational school use; and
- minimising impacts on significant nineteenth-century fabric.

Noting the spatial constraints presented by the site, there were few design pathways available for upgrading the existing campus while also retaining all elements of the significant buildings. The tightly developed nature of the campus, combined with the absence of residual open space significantly limited opportunities to introduce new built form or reconfigure circulation without impacting existing structures. Accordingly, the design process was guided from an early stage by an ambition to minimise demolition wherever possible, and to confine interventions to fabric of lower heritage value, primarily twentieth-century timber infills and areas that have previously been modified.

Option 1 – Retain and adapt existing elements, including the 1897 laundry and bluestone stairs in Kennedy (tested and discounted)

Consistent with the above, the project team considered an approach that avoided demolition entirely. This option proposed the retention of the altered 1897 kitchen/laundry addition, the bluestone stair within Kennedy residence and the twentieth-century weatherboard infills/additions, while accommodating the required upgrades particularly equitable access within the constraints of the existing built form.

While this approach aligned with the principle based on preservation, it proved fundamentally constrained in its capacity to deliver the project's core objectives. The retained elements occupy critical areas of the campus that are central to any meaningful improvement in circulation and access. Their retention would preclude the introduction of a

clear, legible and compliant movement network. Attempting to insert new vertical circulation (lift and stair) elsewhere on the site would necessitate intervention into more sensitive nineteenth-century fabric or further reduce the already limited open space, thereby shifting impacts onto areas of higher heritage value or compromising essential amenity.

The existing 1897 laundry addition forms a physical and spatial barrier within the campus. Its retention would inhibit the creation of meaningful open space and result in a continued pattern of constrained and indirect movement. Any attempt to adapt this structure to accommodate new circulation or access requirements would involve substantial modification, diminishing its integrity without resolving the broader issues of connectivity and legibility.

Similarly, the bluestone stair within the Kennedy residence does not meet contemporary safety or accessibility standards and cannot be upgraded in situ without significant alteration. Retaining this element would therefore perpetuate existing compliance and usability limitations, undermining the objective of providing equitable access across the campus.

More broadly, a retention-led approach would reinforce the fragmented and ad hoc nature of the current campus layout. Circulation would remain indirect and dispersed, with multiple, piecemeal connections required to navigate between buildings. This would not only fail to resolve existing inefficiencies but would also introduce additional interventions across the site, increasing cumulative impacts on significant fabric.

For these reasons, the retention option was determined to be unviable. It does not provide a practicable pathway to achieving equitable access, functional coherence, or long-term operational sustainability, and would ultimately result in either the persistence of existing deficiencies or greater overall impact on the heritage significance of the place.

Option 2 - Targeted removal of later additions (proposed)

The adopted approach involves the targeted removal of later fabric of comparatively low heritage significance and is concentrated in areas that have already undergone substantial alteration. The altered 1897 kitchen/laundry addition, the non-compliant bluestone stair and twentieth-century weatherboard additions are not only of limited historic value in understanding the nineteenth-century evolution of the site, but in several cases obscure the original form, scale and spatial relationships of the Goold and Kennedy residences. A key advantage of this strategy is that it enables the reorganisation of the campus in a manner that is both legible and functionally coherent, while avoiding direct intervention in more intact and late nineteenth century fabric of high heritage significance.

The proposed demolition facilitates two outcomes that are central to the long-term viability of the campus –

1. The removal of the altered 1897 kitchen/laundry addition allows for the creation of a centrally located courtyard. This new open space is critical in addressing the current absence of functional outdoor areas within the campus providing much needed amenity for students and staff. At the same time, it establishes a clearer spatial hierarchy between buildings, improving the appreciation of the original scale and separation of the nineteenth-century residences, which are currently compromised by later infill development.
2. The proposal enables the consolidation of new vertical circulation including lift and stair infrastructure within a defined and previously altered part of the campus. This area, presently occupied by the modified bluestone stair and later weatherboard additions, presents the most suitable location for such intervention due to its reduced heritage sensitivity. Locating new circulation here allows for the efficient integration of equitable access while avoiding fragmentation of circulation routes or intrusive works in more intact areas of the site.

In this context, the extent of demolition is both strategic and proportionate. The works strike an appropriate balance between conservation and adaptation, ensuring the ongoing use of the place as a school while managing heritage impact in a considered and controlled manner.

1.1.3 *Interwar verandah (western elevation Goold residence)*

The proposal includes alterations to eight openings within the interwar verandah to the west elevation of the Goold and Kennedy residences. An undated drawing (Figure 1, likely 1920s) illustrates the original design intent for the verandah, comprising a series of seven segmental arched openings at ground and first-floor levels, with a central bay articulated by a curved parapet. At the northern end, the design included two sets of windows at each level with a gabled parapet above. This scheme appears to have been conceived to present a cohesive architectural presentation to Nicholson Street and to match the gabled end of Kennedy residence.

However, historic aerial photograph from c.1931 (Figure 2) indicates that the verandah was not constructed in accordance with this original design. Instead, it was built in its current form, including a flat parapet above the northern window bays. A further phase of alteration occurred in 1954, when the Walsh building was constructed resulting in the addition of four further sets of windows at both ground and first-floor levels at the northern end (Figure 3). The eight openings subject to the current proposal therefore to this later phase of development.

The west elevation of the heritage residences has been substantially altered by the introduction of the interwar verandah, which obscures the original facade and now dominates the presentation of this side of the campus (Figure 4 and Figure 5). The proposed widening of selected openings is a targeted intervention intended to improve circulation and access (Figure 6).

The proposed widening of the ground-floor openings is driven primarily by operational and circulation requirements. The modified openings are intended to improve:

- permeability through the ground plane, providing a clearer and more legible circulation route along the new east–west link, as well as access to the Convent Garden
- passive supervision and visibility between circulation areas, supporting safer and more efficient movement of students and staff
- views to the bluestone western façade of the Goold residence, currently obscured by the interwar verandah
- the amenity of existing spaces through increased natural light
- architectural coherence, with corresponding first-floor adjustments ensuring a consistent and resolved treatment of the western elevation without altering its overall character

The alternative approach of retaining the existing window openings without modification would maintain the current limitations in permeability and continue to constrain circulation across the campus. Overall, the proposed alterations represent a measured and proportionate response. They allow for substantial improvements in circulation, safety and accessibility while retaining the interwar verandah as an identifiable layer in the building’s ongoing evolution.

It is also noted that the ground-level modifications will be largely screened by the boundary wall, resulting in no appreciable impact on views from the World Heritage Environs Area (WHEA).

The modifications proposed will not alter the overall scale, height or expression of the verandah, nor will they introduce elements that would disrupt its established rhythm or character when viewed from the public domain. Further, the works will not result in detrimental impact on the WHEA, which prioritise views to, spatial relationships between and the legibility of the nineteenth-century buildings within the environs.

IMAGES



Figure 1 Undated drawings showing the original design proposed for the interwar verandah
 Source: Public Record Office Victoria, VPRS16127/P0003

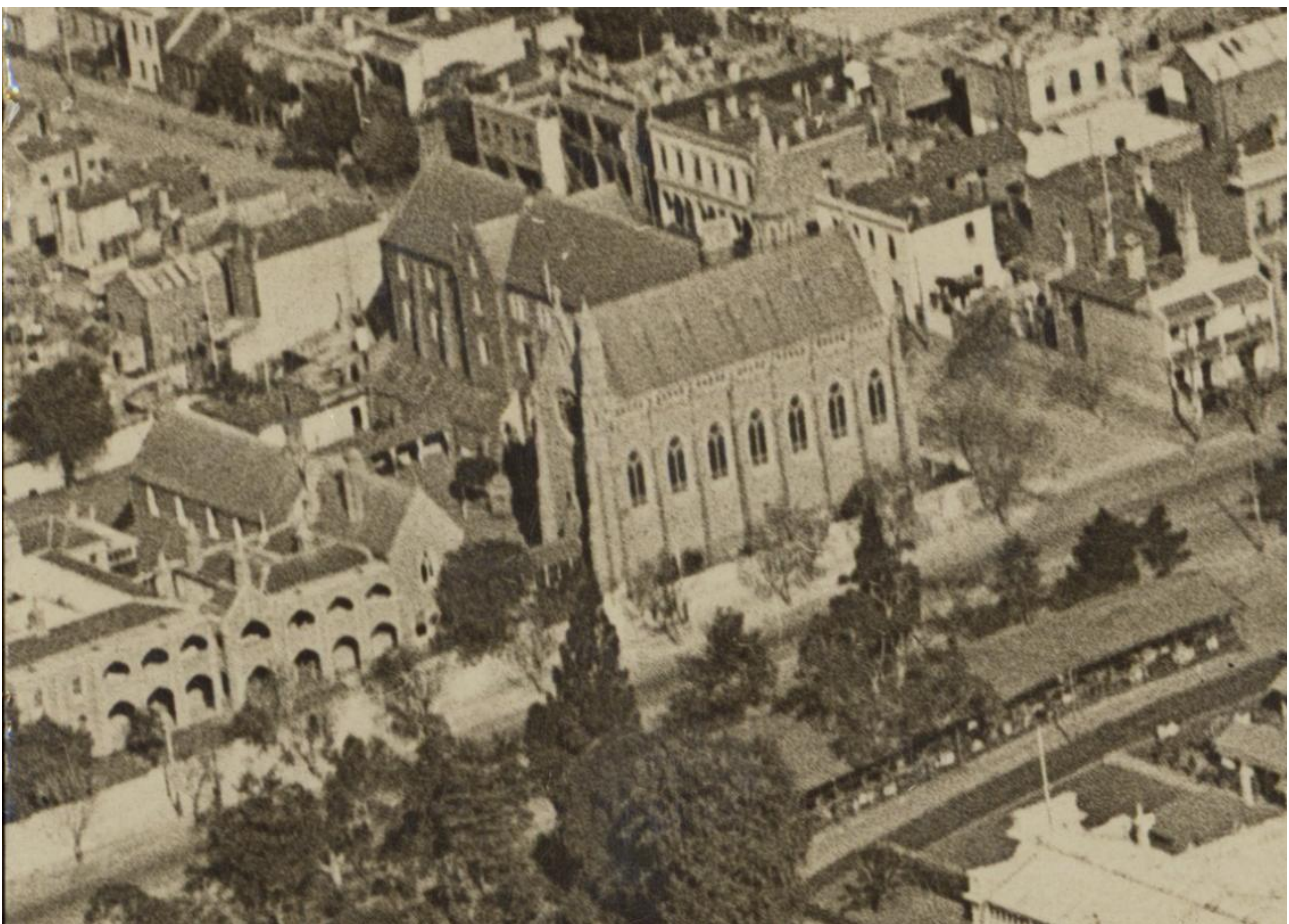


Figure 2 c.1931 aerial showing the interwar verandah constructed in its existing form without the curved central parapet and the gabled northern end
 Source: State Library of Victoria, Record ID: 9929584273607636

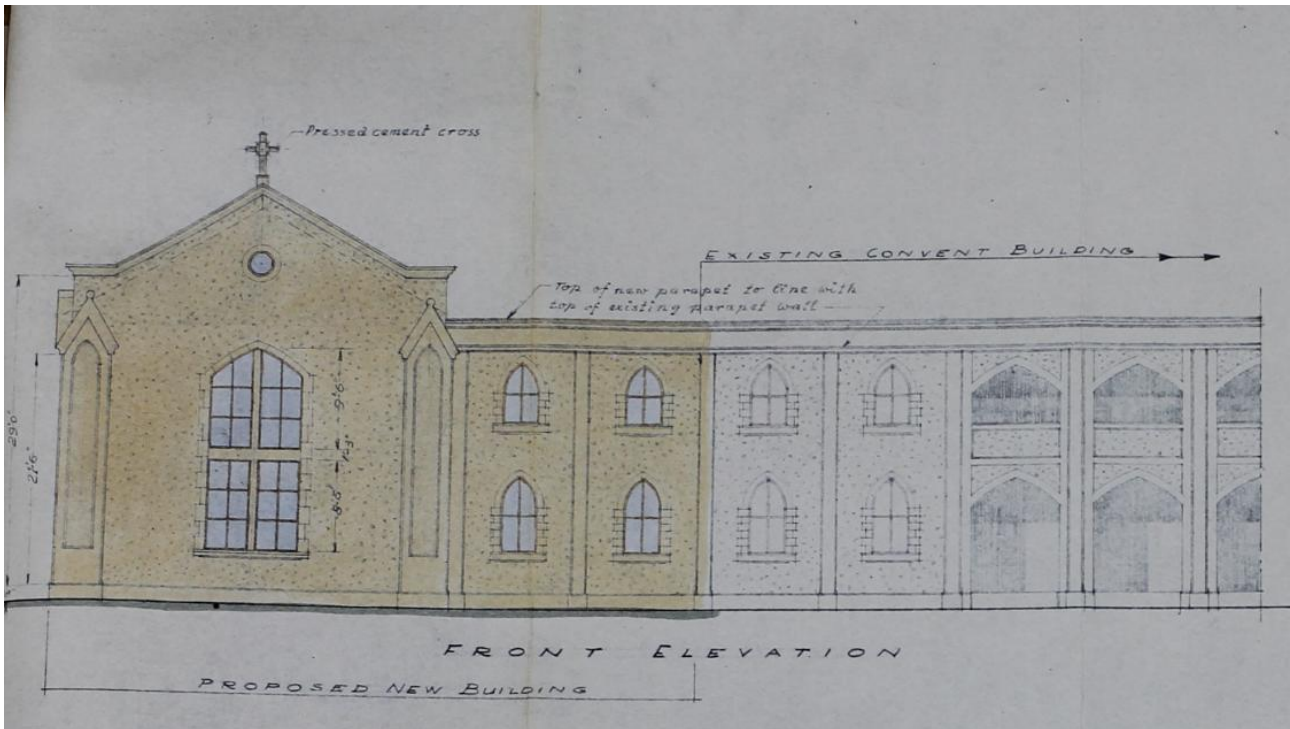


Figure 3 1954 elevation drawing of the Walsh building and the northern extension of the interwar verandah
 Source: Public Record Office Victoria, VPRS8044/P0003



Figure 4 View of the interwar verandah limiting access from the rear areas of campus to the proposed Covent Garden in front



Figure 5 View of the interwar verandah currently obscuring the Goold residence behind



1 3D View
HV View Existing
Plan

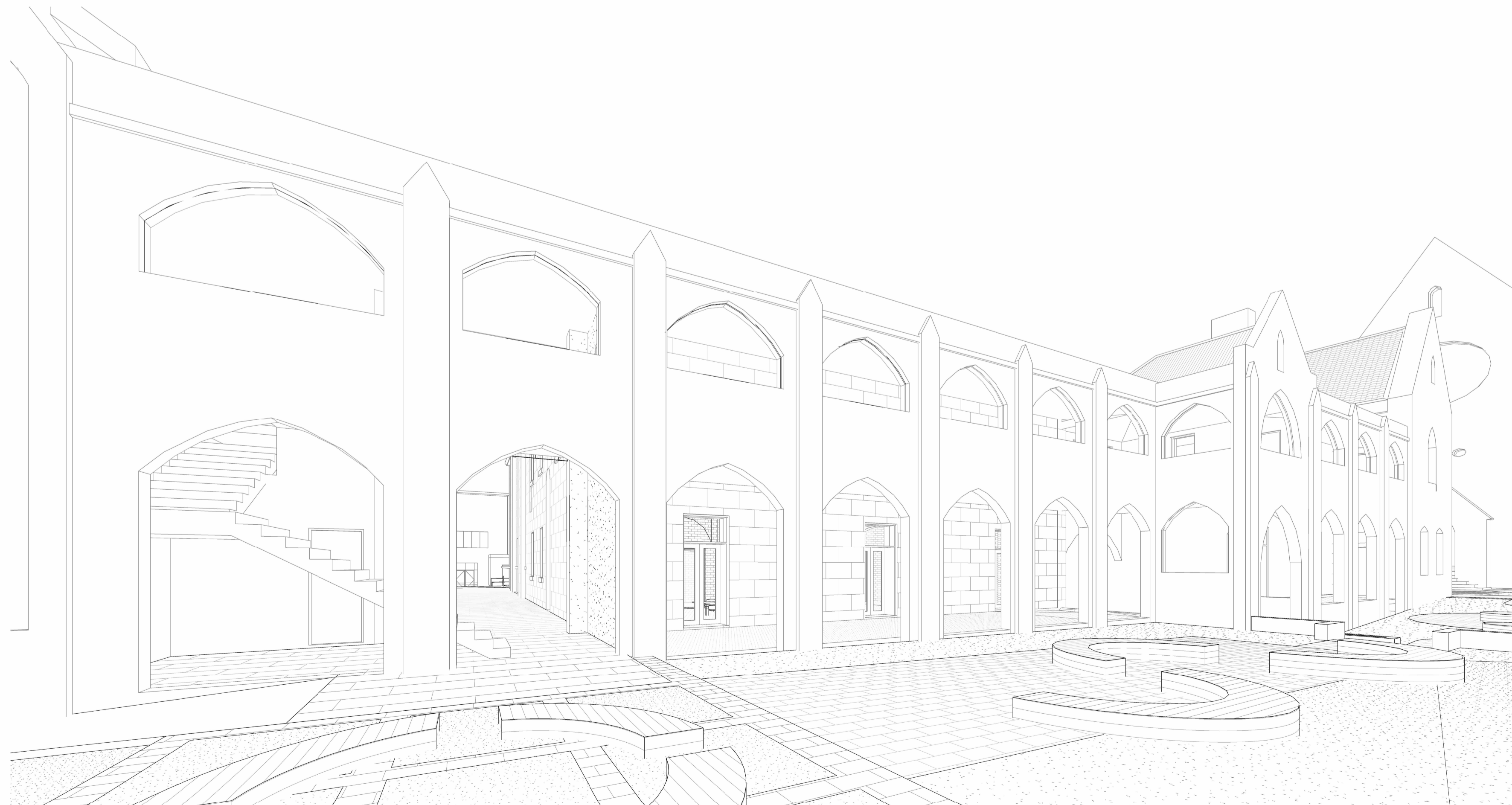


2 3D View
HV View Proposed
Plan

Figure 6 3D view of the existing and proposed widened window openings of the interwar verandah improving views to the Goold residence
Source: PMDL McGlashan Everist

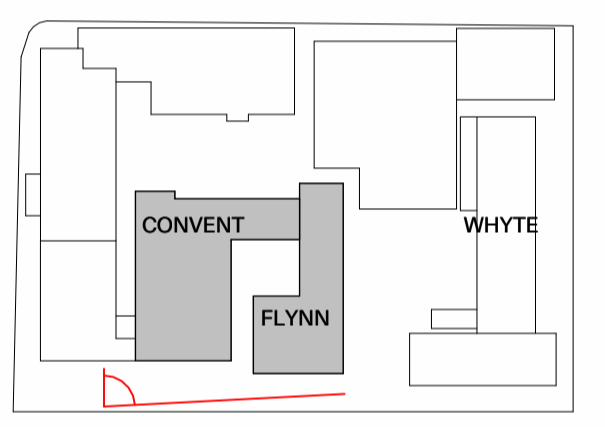


1 3D View
HV View Existing
Scale



2 3D View
HV View Proposed
Scale

Notes
1. Trees omitted for clarity



REV.	DATE	DESCRIPTION	AL	AL
			ISSUED	CHECKED
			BY	BY
HV1	12.05.26	Heritage Victoria RFI	AL	AL

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CHECK ALL DIMENSIONS ON SITE BEFORE MANUFACTURE OR CONSTRUCTION.

PROJECT
The AMIF - Stage 1

CLIENT
The AMIF
 ADDRESS
**88 Nicholson St, Fitzroy
VIC 3065**

NAME
**Perspectives - From Convent
Garden - Nicholson St**

PROJ#
3196
 SCALE

REV



ACADEMY
OF MARY IMMACULATE

TP80.26 HV1