



Title of Proposal - Demolition of a remnant of the 1893 North wing at the Adelaide GPO

Section 1 - Summary of your proposed action

Provide a summary of your proposed action, including any consultations undertaken.

1.1 Project Industry Type

Commercial Development

1.2 Provide a detailed description of the proposed action, including all proposed activities.

Demolition of remnant of the 1893 wing of the Adelaide General Post Office (GPO) located in the north west corner of the site.

1.3 What is the extent and location of your proposed action? Use the polygon tool on the map below to mark the location of your proposed action.

Area	Point	Latitude	Longitude
Remnant of 1893 north 1 wing		-34.926467395108	138.59895107835
Remnant of 1893 north 2 wing		-34.926464096443	138.59907378942
Remnant of 1893 north 3 wing		-34.926549861677	138.59907781273
Remnant of 1893 north 4 wing		-34.926552610561	138.59895577222
Remnant of 1893 north 5 wing		-34.92646684533	138.59895174891
Remnant of 1893 north 6 wing		-34.926467395108	138.59895107835

1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland).



This referral relates to the demolition of a remnant of the 1893 additions to the Adelaide GPO only.

The Adelaide GPO is located in the centre of Adelaide's central business district (CBD) at the corner of King William and Franklin Streets, to the north of Victoria Square. It is located to the east of the former Telephone Exchange building which was constructed in two stages at the turn of the last century (c.1906 and c.1914). The two buildings are separated by a narrow laneway known as Exchange Lane. A number of other important public buildings are located along King William Street, including the Treasury Building and the Town Hall. Directly to the north of the site is Electra House (included on the South Australian Heritage Register as place number 1298), separated from the GPO building by an open plaza area. The Criterion Hotel had occupied this site until the relatively recent past. Victoria Square, to the south of the GPO is the key public open space in the Adelaide CBD.

The Adelaide GPO was constructed between 1865 and 1872 to the design of Edmund Wright and Edward Woods. For reasons associated with the cost of the project, the original Wright and Woods design was redrafted by the Government Architect, Robert George Thomas, in 1868. The key changes arising from the reduction in scope was the removal of the telegraph service and a reduction in the height of the tower. The GPO was opened to the public in 1872. By the 1880s demand for the services of the GPO, in particular the telegraph service, was had increased to the point that an extension was required. The plans for the extension were drawn up in 1891 by architect and Superintendent of Public Buildings, Charles Edward Owen Smyth and was completed by 1893. The extension was sited to the north of the earlier GPO addressing King William Street with red brick wings projecting to the rear (west). The additions adopted the architectural style of the original GPO building.

In the early 1920s the GPO was extended again with the construction of an 'office tower' in the north-western corner of the site. The construction of this tower resulted in the demolition of the middle section of the 1893 red brick wing along the northern site boundary leaving a remnant section to the west of the office tower and another to its east. In 2013 the administrative functions of the GPO were moved from the subject building to the adjacent ATO Tower 8 building. A small Australia Post retail outlet remains in the GPO.

The original 1872 sections of the Adelaide GPO building comprise a two-storey building with a large basement. It was constructed in the Victoria Free Classical idiom in Glen Ewin freestone with carved Bath limestone ornaments. The clock tower, christened Victoria Tower, is located on the corner of Franklin Street and King William Street and rises in three distinct sections above the parapet of the GPO building. The 1893 extension along King William Street adopts the style, form and detail of the original building with differences in the colour of the stonework providing the key distinction between the two building programs. The 1921-23 office tower addition comprises a five-storey plus partial basement constructed of rendered brickwork.

As noted, an isolated fragment of the 1893 wing survives to the west of the 1920s additions. Demolition of this element is the subject of the current referral.

1.6 What is the size of the proposed action area development footprint (or work area)



including disturbance footprint and avoidance footprint (if relevant)?

Approximately 12m x 12m of which approximately half is included in Commonwealth land

1.7 Is the proposed action a street address or lot?

Street Address

141 King William Street; and

2-10 Franklin Street
Adelaide SA 5000
Australia

1.8 Primary Jurisdiction.

South Australia

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

No

1.10 Is the proposed action subject to local government planning approval?

Yes

1.10.1 Is there a local government area and council contact for the proposal?

No

1.11 Provide an estimated start and estimated end date for the proposed action.

Start date 10/2017

End date 11/2017

1.12 Provide details of the context, planning framework and State and/or Local government requirements.

Heritage Places Act 1993

Pursuant to the Heritage Places Act 1993, the Adelaide GPO is included on the South Australian Heritage Register (SAHR) as place ID 10860. The extent of this registration is shown on the mapping at <http://location.sa.gov.au>. The GPO is described in the SAHR listing as:



Adelaide General Post Office (GPO), including the original 1872 building, remaining 1893 extensions, former Telephone Exchange (1907) and its 1914 extension.

The plan parcel and titles included in this extent on the SAHR are as follows:

CT 6185/92 D93115 A768, CT 6185/94 D93115 A810, CT 6185/97 C23886 F2, CT 6185/98 C23886 FCP, CT 6187/188 D93115 A809, CT 6187/187 D86151 A801, CT 6187/188 D93115 A809.

It is noted that the SAHR mapping at <http://location.sa.gov.au> does not show the subject remnant of the 1893 extensions. However DEWNR has described that, is 'an inconsistency' further noting 'Whether this was intentional or an oversight I don't know'. It has been practice to assume that the written description of the building, which includes the subject remnant is included on the SAHR.

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders.

The Aboriginal Affairs and Reconciliation Division, Department of Premier and Cabinet (DSD-AAR), is the South Australian Government's lead agency on matters relating to Aboriginal affairs. The Division has a number of responsibilities including the protection and preservation of Aboriginal heritage and culture. DSD-AAR maintains a Central Archive and Register of Aboriginal Sites and Objects. These archives are not public but the Department can provide broad information about Aboriginal heritage on receipt of a formal request. A formal request was made to the Aboriginal Affairs and Reconciliation Division in May 2016. On 9 June 2016, the Department advised that the Central Archive has no entries for Aboriginal sites within the GPO site.

The works that are the subject of this referral are modest in terms of their extent with no impacts on the identified Commonwealth values of the GPO. Consequently, no consultation with the broader public has been undertaken.

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project.

As discussed at 1.15 below, the broader GPO site is to be developed in the short term and a referral for these work is under consideration.

In addition a Heritage Impacts Assessment is currently being drafted for an application to the SA Development Approval Commission. It is expected that the application will be lodged in late September. This document makes limited reference to subject building, noting:

A conservation management plan (CMP) for the GPO was prepared by Bruce Harry and Associates in 2007. Subsequently, a Heritage Management Plan (HMP) was prepared for the



site by Lovell Chen on 2016. Both documents identify the Victoria (1872 and 1893) sections of the building as retaining all of the fabric and spaces of primary significance ... Both earlier documents identified ...the isolated remnant of the 1893 wing in the north-eastern section of the site as being of little or no significance. The proposed demolition of [this element] will not affect the identified significance of the GPO.

Elsewhere it notes that the demolition of the remnant 1893 fabric, *has been supported by the Heritage Branch of DEWNR in the recent past in response to another, broadly similar development proposal for the site.*

1.15 Is this action part of a staged development (or a component of a larger project)?

Yes

1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action.

Referral for the broader redevelopment of the GPO is currently under consideration by the Department of Environment & Energy (2015/7547). These works have been identified as a controlled action. The history of that referral is reproduced below.

A referral to the Department of the Environment was made in 2015 for commercial (office and retail) redevelopment of the GPO and Telephone exchange sites at 141 King William Street and 2-10 Franklin Street respectively. The referral identified works to each building and the construction of two new tower elements - one to each building. The Department acknowledged receipt of the referral on 24 August 2015 (Stuart Row).

It was subsequently determined that the proposed action was a controlled action under the EPBC Act (Bruce Edwards, 8 October 2015).

A request for additional information (RFI) was subsequently made by the Department.

A request for a variation was made by this office (Peter Lovell, 24 December 2015) to exclude the works to the telephone exchange from the referral on the grounds that no part of the building or the proposed tower would be located within the Commonwealth Land and the works would have no adverse impact on the identified Commonwealth Heritage Values of the GPO.

The variation was accepted by the Department (Bruce Edwards, 19 February 2016).

The Department issued a revised RFI acknowledging the removal of the telephone exchange works to the exchange from the referral (Bruce Edwards, 16 March 2016).

Works on the former telephone exchange site are to commence shortly. Demolition works include the removal of buildings to the rear (north and north-east) of the telephone exchange, including the remnant of the 1893 north wing to the west of the 1920s additions to the GPO (the subject of this referral). This building straddles title boundaries. Its eastern section is located



on Commonwealth land. Its western section is not.

The owner has self-assessed impacts in relation to demolition works directly to the rear (north) of the former telephone exchange site and is comfortable that no significant impact will occur. However, the owners would prefer legal certainty in relation to the demolition of the 1893 remnant, the eastern section of which is located on Commonwealth land. This referral relates to these minor works only.

1.16 Is the proposed action related to other actions or proposals in the region?

Yes

1.16.1 Identify the nature/scope and location of the related action (Including under the relevant legislation).

Refer 1.15 above.



Section 2 - Matters of National Environmental Significance

Describe the affected area and the likely impacts of the proposal, emphasising the relevant matters protected by the EPBC Act. Refer to relevant maps as appropriate. The [interactive map tool](#) can help determine whether matters of national environmental significance or other matters protected by the EPBC Act are likely to occur in your area of interest. Consideration of likely impacts should include both direct and indirect impacts.

Your assessment of likely impacts should consider whether a bioregional plan is relevant to your proposal. The following resources can assist you in your assessment of likely impacts:

- [Profiles of relevant species/communities](#) (where available), that will assist in the identification of whether there is likely to be a significant impact on them if the proposal proceeds;
- [Significant Impact Guidelines 1.1 – Matters of National Environmental Significance](#);
- [Significant Impact Guideline 1.2 – Actions on, or impacting upon, Commonwealth land and Actions by Commonwealth Agencies](#).

2.1 Is the proposed action likely to have ANY direct or indirect impact on the values of any World Heritage properties?

No

2.2 Is the proposed action likely to have ANY direct or indirect impact on the values of any National Heritage places?

No

2.3 Is the proposed action likely to have ANY direct or indirect impact on the ecological character of a Ramsar wetland?

No

2.4 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

No

2.5 Is the proposed action likely to have ANY direct or indirect impact on the members of any listed migratory species, or their habitat?

No



2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

No

2.7 Is the proposed action to be taken on or near Commonwealth land?

Yes

2.7.1 Is the proposed action likely to have ANY direct or indirect impact on the Commonwealth land?

Yes

2.7.2 Describe the nature and extent of the likely impact on the whole of the environment.

Likely impacts on the Adelaide GPO are limited to the removal of early fabric dating from the 1893 additions to the GPO and minor changes to the context and setting of the GPO.

2.7.3 Do you consider this impact to be significant?

No

2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?

No

2.9 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No

2.10 Is the proposed action a nuclear action?

No

2.11 Is the proposed action to be taken by the Commonwealth agency?

No

2.12 Is the proposed action to be undertaken in a Commonwealth Heritage Place Overseas?

No



2.13 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No



Section 3 - Description of the project area

Provide a description of the project area and the affected area, including information about the following features (where relevant to the project area and/or affected area, and to the extent not otherwise addressed in Section 2).

3.1 Describe the flora and fauna relevant to the project area.

Not applicable

3.2 Describe the hydrology relevant to the project area (including water flows).

Not applicable

3.3 Describe the soil and vegetation characteristics relevant to the project area.

Not applicable

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area.

Not applicable

3.5 Describe the status of native vegetation relevant to the project area.

Not applicable

3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

Not applicable

3.7 Describe the current condition of the environment relevant to the project area.

This referral relates to the demolition of a remnant of the 1893 additions to the Adelaide GPO. A broader suite of works at the GPO is the subject of another referral (2015/7547).

As noted above, the Adelaide GPO is located in Adelaide's CBD at the corner of King William



and Franklin streets, to the north of Victoria Square. It is located to the east of the former Telephone Exchange building which was constructed in two stages in the early part of the last century. The two buildings are separated by a narrow laneway known as Exchange Lane. A number of other important public buildings are located along King William Street, including the Treasury Building and the Town Hall. Directly to the north of the site is Electra House, which is included on the South Australian Heritage Register, separated from the GPO building by an open plaza area. The Criterion Hotel had occupied this site until the relatively recent past. Victoria Square, to the south of the GPO is the key public open space in the Adelaide CBD.

The original two-storey GPO building (1867-72) was constructed to the King William and Franklin Street boundaries of the site, with the five-level Victoria Tower marking the south-eastern corner of the allotment. The building adopts a lavish Victorian Free Classical idiom. The two principal facades of the original building are of Glen Ewin freestone, with carved Bath limestone ornamentation and Glen Osmond bluestone employed for the remaining external walls and basement construction. The 1893 Post Office extension along King William Street continues the architectural language of the original. However, it is faced with Murray Bridge freestone. Long wings extended westwards from the facade of the 1893 addition. The construction of a further office tower addition in the 1920s required the demolition of the central section of these wings.

Albeit reduced through the sale of the telephone exchange, the subject Commonwealth-owned GPO site is entirely built to the boundaries of its site area. To the north is a vacant allotment. To the west is the original internal roadway, Exchange Place.

3.8 Describe any Commonwealth Heritage Places or other places recognised as having heritage values relevant to the project area.

As noted above, the eastern half of the subject building is located on Commonwealth land associated with the Adelaide GPO. The GPO is included on the Commonwealth Heritage List (CHL). The summary statement of significance included in the CHL for the Adelaide GPO is as follows:

The Adelaide General Post Office forms an important part of Adelaide's central civic and administrative precinct, playing a critical role since 1872 in the delivery and development of postal services in Adelaide. The building, and broader precinct, are well-known images and are often used to illustrate the historical nature and prosperity of the city. The GPO was the most expensive building constructed to that time by the colonial government in South Australia. This emphasises its importance to the colony and the city of Adelaide, further underscored by the involvement of the Duke of Edinburgh in laying the foundation stone (Criterion a).

Typologically, the Adelaide GPO seamlessly accommodated distinctly separate postal and telegraph functions within the one large structure. Where it differs from other GPO designs, however, is in the centralisation of a large public hall from which all transactions were carried out at counters to separate departments located around the perimeter in discrete offices, in



place of an external arcade or loggia with service windows along its length. In this regard, Adelaide GPO can be considered an early exemplar of planning around an internal public space. Stylistically, the design of the Adelaide GPO included several characteristics associated with Italian architectural mannerism from around the late 1520s and the 1530s; this is seen in the balustraded parapet usage, the recessed concentric arches, the arch and flanking columns, the displaced pediments and asymmetrical elevations inflecting toward a common point that brings symmetry. (Criterion d).

The Adelaide General Post Office is important as a major public building erected in the Victorian Free Classical Renaissance revival style. Constructed from Glen Osmond and Glen Ewin stone, and ornamented with Bath limestone, the building features a prominent clock tower, and is a significant streetscape item on the corner of King William and Franklin Streets. In conjunction with the Town Hall, it forms an imposing gateway feature at the edge of Victoria Square (Criterion e).

The architectural expression of the tower is unique and rests upon its distinctive flared cupola roof and upper stage consoles. The use of Glen Ewin freestone and in particular the extensive modelling and carved ornamentation is representative of the highest standards of workmanship and contribute to the style of Adelaide's Renaissance Revival architecture which is outstanding nationally. The postal hall at the Adelaide GPO is also one of Australia's finest public interiors of the mid-to-late nineteenth century (Criterion f).

The GPO has considerable social significance for Adelaide residents owing to the building's lengthy connection with postal services and is important to the community as a well-known landmark (Criterion g).

The Adelaide General Post Office is associated with several architects of note, including Edmund Wright, Edward John Woods, Edward Angus Hamilton and Robert George Thomas (Criterion h).

As noted above, Electra House at 131 King William Street is located to the north of the subject building remnant across a small public space known as Dexus Plaza. Electra House is included on the SAHR (State Heritage ID 13387). The broader GPO has a relationship with the Adelaide Town Hall at 128-38 King William Street. This is also included on the SAHR (State Heritage ID 10859) deriving from their shared civic function and the physical relationship of their clock towers.. The identified heritage values of these buildings will not be affected by the proposed demolition.

3.9 Describe any Indigenous heritage values relevant to the project area.

Not applicable

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area.



The subject sections of the site are held freehold by Charter Hall Group. Australia Post continues to exercise a 99-year lease over the GPO and operates a small retail tenancy from the Postal Hall.

3.11 Describe any existing or any proposed uses relevant to the project area.

No development of the subject section of the GPO site is proposed as part of the current referral. Once demolition of the subject building remnant is undertaken, the area will be retained as open space providing public access to the plaza to the north.



Section 4 - Measures to avoid or reduce impacts

Provide a description of measures that will be implemented to avoid, reduce, manage or offset any relevant impacts of the action. Include, if appropriate, any relevant reports or technical advice relating to the feasibility and effectiveness of the proposed measures.

Examples of relevant measures to avoid or reduce impacts may include the timing of works, avoidance of important habitat, specific design measures, or adoption of specific work practices.

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action.

As discussed above, it is considered that no significant impacts on Commonwealth Heritage values will occur. However, some potential for physical impacts exists. The subject building abuts the 1920s addition to the GPO. This element is identified as demonstrating the following Commonwealth values. The CHL citation notes:

Criterion D Characteristic values

Adelaide General Post Office is an example of the work of Colonial and Commonwealth architects.

The 1920s alterations and additions to the Adelaide GPO by Commonwealth chief architect J S Murdoch in close co-operation with superintendent of public buildings in South Australia, A E Simpson, recall the transfer of responsibilities for the design of Commonwealth buildings from the State to Commonwealth governments.

While no significant impacts on the identified official value of the GPO noted above is anticipated, the potential exists for physical impacts arising from the demolition works. To reduce the potential for impacts of this kind, it is proposed to remove roof structure and cladding of the remnant in the vicinity of the 1920s addition by hand. Walls of the remnant will then be saw cut around 600mm from the 1920s additions isolating this section on the remnant from the office tower. At this point, demolition would proceed with the final sections (the 600mm nib) demolished by hand. No new building on this section of the site is proposed as part of this referral.



4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved.

The outcome to be achieved is that no physical damage to the additions of 1920s will occur.



Section 5 – Conclusion on the likelihood of significant impacts

A checkbox tick identifies each of the matters of National Environmental Significance you identified in section 2 of this application as likely to be a significant impact.

Review the matters you have identified below. If a matter ticked below has been incorrectly identified you will need to return to Section 2 to edit.

5.1.1 World Heritage Properties

No

5.1.2 National Heritage Places

No

5.1.3 Wetlands of International Importance (declared Ramsar Wetlands)

No

5.1.4 Listed threatened species or any threatened ecological community

No

5.1.5 Listed migratory species

No

5.1.6 Commonwealth marine environment

No

5.1.7 Protection of the environment from actions involving Commonwealth land

No

5.1.8 Great Barrier Reef Marine Park

No

5.1.9 A water resource, in relation to coal/gas/mining

No



5.1.10 Protection of the environment from nuclear actions

No

5.1.11 Protection of the environment from Commonwealth actions

No

5.1.12 Commonwealth Heritage places overseas

No

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action.

This referral is made on the basis that the demolition of the remnant of the 1893 wing of the GPO (the remnant) will have no adverse impact on the official values of the Adelaide GPO. As noted, the small remnant is partially located inside and partially outside Commonwealth land. Its demolition will enable works on the adjacent, telephone exchange, site to proceed while works across the broader GPO site - the subject of a controlled action - are under consideration by the Department.

The CHL citation identifies the Adelaide GPO as illustrating six official values. The subject building element does not illustrate any of these values to a substantial extent and it is considered that its demolition will not result in a significant impact. The six values are discussed below.

Criterion A - Processes

The Adelaide GPO, built in 1867-1872 and extended in 1891-1892 [sic], is considered significant as one of South Australia's most important public buildings. While the subject remnant dates from the additions of 1893, it is an isolated element no longer physically attached to, nor retaining a legible association with, the GPO and its role as part of an important public building is no longer legible.

Criterion D - Characteristic values

The Adelaide GPO is valued as an example of: a General Post Office (first generation typology 1803-1869) with combined telegraph office and second generation additions; a building in a Victorian free classical Renaissance revival style; and for its association with Colonial and Commonwealth architects. The subject remnant is not executed in a Victorian free classical Renaissance revival style nor is it associated with Colonial or Commonwealth architects. While it forms part of a second generation addition, this relationship is no longer legible for the reasons discussed above.

Criterion E - Aesthetic values



The CHL citation identifies the street facades of the GPO, its prominent clock tower, and its role as a significant streetscape item on the corner of King William and Franklin Streets as supporting this value. Its relationship with the Town Hall, with which it forms an imposing gateway feature at the edge of Victoria Square, is also seen to support this value. As a back-of-house element, removed from the street frontages, the remnant section of the 1893 north wing does not contribute to this value. It is noted that the remnant was identified as being of little or no significance in the 2016 HMP (Lovell Chen, 2016). This assessment reiterated a similar view expressed in an earlier CMP (Bruce Harry, 2007).

Criterion F - Technical achievements.

This criterion is identified as applying to the facades and the Postal Hall only. The subject remnant retains no evidence of technical achievement.

Criterion G - Social value

The GPO is considered significant for its lengthy connection with postal services and is important to the community as a well known landmark. As a generic, back-of-house element, the public has never had access to the remnant and these aspects of the GPO are not evident in the subject building element. This value is better understood in public areas of the building or through its street facades.

Criterion H Significant people

The CHL citation identifies its association with a number of notable architects including, Edmund Wright, Edward John Woods, Edward Angus Hamilton and Robert George Thomas (Criterion h)¹. The plans for the 1893 additions to the Adelaide GPO were prepared by architect and Superintendent of Public Buildings, Charles Edward Owen Smyth, and his chief draftsman, F C Krichauff. No association with the architects identified in the citation exists in the subject building element.

It is noted that the current referral deals with the demolition of the 1893 remnant only. No new building works are proposed.



Section 6 – Environmental record of the person proposing to take the action

Provide details of any proceedings under Commonwealth, State or Territory law against the person proposing to take the action that pertain to the protection of the environment or the conservation and sustainable use of natural resources.

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Please explain in further detail.

Built is committed to establishing and maintaining their and their clients work environments with priority given to minimising adverse environmental effects from our activities and fostering a culture of sustainable environmental management.

The Built environmental strategy is the ongoing development of a system based on AS/NZS ISO14001, legislation and applying the principles of best practice environmental management to our activities. Built is committed to objectives and individual programs by applying proactive approaches to environmental stewardship.

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application.

There have been no proceedings under any Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against Built or the person making the application.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

Yes

6.3.1 If the person taking the action is a corporation, please provide details of the corporation's environmental policy and planning framework.

Built has an Environmental Management System (EMS) which is accredited to ISO 14001 and provides a structured approach to the development, implementation and monitoring of the project-specific Environmental Management Plan (EMP) for the project delivery. Our EMS is



guided by our 'Environmental Policy' and 'Environmental Sustainability Policy' which set our commitment to reduce our impact on the environment and to adopt practices that use resources sustainably. Our environmental planning framework includes:

Project-specific risk assessment

Project-specific Environmental Aspects and Impacts Register

Project-specific EMP

Roles and responsibilities

Objectives and Targets

Internal and External Communication and Consultation

Management of subcontractors and suppliers

Legal and other requirements

Emergency Planning and Response

Incident Management

Reporting

Audits

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

Yes

6.4.1 EPBC Act No and/or Name of Proposal.

A separate referral (EPBC 2015/7547) by Charter Hall Group is currently under consideration by the Department.



Section 7 – Information sources

You are required to provide the references used in preparing the referral including the reliability of the source.

7.1 List references used in preparing the referral (please provide the reference source reliability and any uncertainties of source).

Reference Source	Reliability	Uncertainties
Conservation Management Plan, Bruce Harry and Associates, 2007 Heritage Managemet Plan, Lovell Chen Pty Ltd, 2016 Citation, Commonwealth Heritage List	Good Good Good	None None None



Section 8 – Proposed alternatives

You are required to complete this section if you have any feasible alternatives to taking the proposed action (including not taking the action) that were considered but not proposed.

8.0 Provide a description of the feasible alternative?

It is feasible that the remnant could be stabilised and retained in situ; however the heritage significance of this element does not warrant this approach.

8.1 Select the relevant alternatives related to your proposed action.

Activities

8.9 Describe any public consultation that has been, is being or will be undertaken (including with Indigenous stakeholders).

None

8.10 Describe any environmental impact assessments that have been, is being or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project for the alternative.

None

8.12 Nominate any matters of National Environmental Significance that are likely to be impacted by this alternative proposal by ticking the relevant checkboxes.

8.13 Describe any impacts on the flora and fauna relevant to the alternative proposal.

None

8.26 What are the proposed measures for any alternative action to avoid or reduce impact?



None

8.27 Do you have another alternative?

No



Section 9 – Contacts, signatures and declarations

Where applicable, you must provide the contact details of each of the following entities: Person Proposing the Action; Proposed Designated Proponent and; Person Preparing the Referral. You will also be required to provide signed declarations from each of the identified entities.

9.0 Is the person proposing to take the action an Organisation or an Individual?

Organisation

9.2 Organisation

9.2.1 Job Title

Senior Design Manager

9.2.2 First Name

Brian

9.2.3 Last Name

Richards

9.2.4 E-mail

brianrichards@built.com.au

9.2.5 Postal Address

Level 1

163 Clarendon street
South Melbourne VIC 3205
Australia

9.2.6 ABN/ACN

ABN

47108928409 - Built Holdings Pty Limited

9.2.7 Organisation Telephone



9.3 Is the Proposed Designated Proponent an Organisation or Individual?

Organisation

9.5 Organisation

9.5.1 Job Title

Senior Design Manager

9.5.2 First Name

Brian

9.5.3 Last Name

Richards

9.5.4 E-mail

brianrichards@built.com.au

9.5.5 Postal Address

Level 1

163 Clarendon Street
South Melbourne VIC 3205
Australia

9.5.6 ABN/ACN

ABN

47108928409 - Built Holdings Pty Limited

9.5.7 Organisation Telephone

9926 1900

9.5.8 Organisation E-mail

admin@built.com.au

Proposed designated proponent - Declaration



(03) 9926 1900

9.2.8 Organisation E-mail

admin@built.com.au

9.2.9 I qualify for exemption from fees under section 520(4C)(e)(v) of the EPBC Act because I am:

Not applicable

Small Business Declaration

I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small a business entity and confirm that I qualify for a small business exemption.

Signature:..... Date:

9.2.9.2 I would like to apply for a waiver of full or partial fees under Schedule 1, 5.21A of the EPBC Regulations

No

9.2.9.3 Under sub regulation 5.21A(5), you must include information about the applicant (if not you) the grounds on which the waiver is sought and the reasons why it should be made

Person proposing the action - Declaration

I, BRIAN RICHARDS, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf of or for the benefit of any other person or entity.

Signature: BRA Date: 21/9/2017

I, BRIAN RICHARDS, the person proposing the action, consent to the designation of BUILT PTY LTD as the proponent of the purposes of the action describe in this EPBC Act Referral.

Signature: BRA Date: 21/9/2017



I, BRIAN RICHARDS, the proposed designated proponent, consent to the designation of myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature: Brian Richards Date: 21/9/2017

9.6 Is the Referring Party an Organisation or Individual?

Organisation

9.8 Organisation

9.8.1 Job Title

Senior Associate

9.8.2 First Name

John

9.8.3 Last Name

Statham

9.8.4 E-mail

jstatham@lovellchen.com.au

9.8.5 Postal Address

Level 5

176 Wellington Parade
East Melbourne VIC 3002
Australia

9.8.6 ABN/ACN

ABN

20005803494 - LOVELL CHEN PTY. LTD.

9.8.7 Organisation Telephone

(03) 9667 0800



9.8.8 Organisation E-mail

jstatham@lovellchen.com.au

Referring Party - Declaration

I, JOHN STATHAM, I declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signature: JR Statham Date: 21.09.2017



Appendix A - Attachments

The following attachments have been supplied with this EPBC Act Referral:

1. adelaide_gpo_hmp_2016_ch1_introduction.pdf
2. adelaide_gpo_hmp_2016_ch2_history.pdf
3. adelaide_gpo_hmp_2016_ch3_physical_analysis-part_a.pdf
4. adelaide_gpo_hmp_2016_ch3_physical_analysis-part_b.pdf
5. adelaide_gpo_hmp_2016_ch4_assessment.pdf
6. adelaide_gpo_hmp_2016_ch5_opportunities_and_constraints.pdf
7. adelaide_gpo_hmp_2016_ch6_policy.pdf
8. adelaide_gpo_hmp_2016_ch7_appendicies-a-b-c.pdf
9. capture_development_plan.jpg
10. proposed_demolition_indicated_in_blue.jpg
11. view_from_above.jpg
12. view_from_north.jpg
13. viwed_from_south.jpg