

Compliance Report - EPBC 2015/7547

Greaton GPO Property Pty Ltd (CAN 621 676 597) ATF the Greaton GPO Property Unit trust (ABN 66 524 794 742)

Adelaide General Post Office Redevelopment

-Site Address, 141-159 King William Street, ADELAIDE SA 5000

Date: 11/05/22

Introduction

The adaptive reuse of the Commonwealth Heritage GPO building from Australia Post office / retail to a 5-Star Hotel – The Hotel comprises a 16-level tower incorporating 12 levels of hotel guest rooms above the existing GPO building and including two levels of enclosed plant. The hotel facilities include a ball room, restaurant/kitchens, bar, meeting /function rooms, club lounge, pool, gym and administrative/back of house areas (basement); Works include demolition of the 1920s five storey offices to the north of the GPO building; The project will be completed in two stages, separated by a temporary firewall. This report focuses on Stage 1.

EPBC Approval Conditions Compliance Schedule			
Condition Number/ reference	Condition	Is the Project compliant with this Condition?	Evidence/Comments
1	The action must be undertaken in accordance with all conditions included in the Decision Notification Form (Attachment A) as approved, or as varied from time to time, under Regulation 24 under the Development Act 1993 (SA). If that approval expires prior to the commencement of the action the approval holder must comply with the conditions included in the latest version of the approval until such time as a new approval is granted. The approval holder must inform the Department, in writing and within 10 business days, of any new	Compliant	Current SCAP approval on file which was provided to DAWE is Application no: 020/A004/18V2 and Council Refence: S10/4/2018/B – as indicated in Aconex WTPC-GCOR-000911.

	approval granted under the Development Act 1993 (SA) or any variation to the existing approval.		The 2021 SCAP approval was provided to DAWE on 25 March 2021, email received from Nicholas Scholar (A/g Assistant Director Environmental Audit Section) on 16 April 2021 confirming correspondence received. <i>(see appendix 1 – attached copy of the sent notification and response)</i>
2	Prior to commencing the action the approval holder must ensure an archival record of the current condition of the Adelaide GPO is prepared, made publicly available and provided to the State Library of South Australia (or other relevant South Australian Government collecting agency as approved by the Department in writing). The archival record must be prepared in accordance with relevant guidelines produced by the government of a state or territory of Australia and must include, but should not be limited to, photographic recording and detailed measured drawings of all areas to be modified or demolished as part of the proposed action, or which are at risk of damage.	Compliant	Lodged with the Department on 23 January 2020. Email received from the Compliance Monitoring Team on 28 January 2020 stating that the reporting requirements under condition 2 were met. <i>(see appendix 2 – attached copy of the sent notification and response)</i>
3	-Any damage to, or loss of, heritage fabric which is not proposed as part of the action as described in the referral or assessment documentation (including attachments related to approvals under the Development Act 1993 (SA)) will be treated as non-compliance. In addition to adhering to the requirements of conditions 12 and 13, upon becoming aware of any instance of unapproved damage to, or loss of, heritage fabric the approval holder must immediately: a. implement measures to prevent any reoccurrence or progression of damage; and b. undertake prompt repairs and/or stabilization work in accordance with best practice heritage management and in consultation with a heritage expert. The approval holder must inform		Two minor non-conformances have been reported and are currently being reviewed for approval by SCAP as Minor Variations. Peter Wells has reviewed these items and is satisfied they are minor in nature and has confirmed his support for approval. LC has also inspected

	the Department within two business days of making a decision that repair is not possible and provide the advice on which that decision is made, as well as photographic record of the damage.		these items and has provided advice.
4, 5 & 6	<p>Heritage Interpretation Plan</p> <p>4. The approval holder must submit a Heritage Interpretation Plan for the Department's approval. The Heritage Interpretation Plan must specify how interpretation material installed or distributed on site or online will demonstrate and communicate the heritage values of the place, including the listed Commonwealth Heritage Values. If the Department approves the Heritage Interpretation Plan then the approved Heritage Interpretation Plan must be implemented.</p> <p>5. The approval holder must not commence operations unless the Department has approved the Heritage Interpretation Plan in writing.</p> <p>6. The Heritage Interpretation Plan must be consistent with the Department's Environmental Management Plan Guidelines and must include: a. details of what interpretation will be implemented, and how and when it will be implemented and maintained; b. details of how interpretation will be communicated to the public; and c. details of the monitoring and evaluation methods to be employed to assess and improve the success of interpretation. The approval holder must ensure that all interpretation materials are prepared, installed and maintained for the life of the approval in accordance with the approved Heritage Interpretation Plan</p>	Not Applicable	Heritage Interpretation Plan is currently being prepared, however, is yet to be submitted to the Department. It is noted that no operations have commenced, in accordance with condition 5.
7	<p>Notification of date of commencement of the action</p> <p>The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.</p>	Compliant	The action commenced on 11 May 2021. Letter sent to the Department on 12 May 2021.

			Confirmation received from the Department on 2 June 2021 including letter reference no: 19/035533. <i>(see appendix X – attached copy of the sent notification and response)</i>
8 & 9	<p>Compliance records</p> <p>8 The approval holder must maintain accurate and complete compliance records.</p> <p>9. If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, and or used to verify compliance with the conditions. Summaries of the result of an audit may be published on the Department's website or through the general media.</p>	Compliant	A compliance Records Report is available upon request
10	<p>Preparation and publication of plans</p> <p>The approval holder must: a. submit plans electronically to the Department for approval by the Department; b. publish each plan on the website within 20 business days of the date the plan is approved by the Department or of the date a revised Heritage Interpretation Plan is submitted to the Department, unless otherwise agreed to in writing by the Department; c. exclude or redact personal information from plans published on the website or provided to a member of the public; and d. keep plans published on the website until the end date of this</p>	Compliant	The action commenced on 11 May 2021. This Annual Compliance report is the first plan to be provided to the Department. In accordance with condition 11 it will be published on the website within 60 business days.

11	<p>Annual compliance reporting</p> <p>-The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a. publish each compliance report on the website within 60 business days following the relevant 12 month period; b. notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication; c. keep all compliance reports publicly available on the website until this approval expires; d. exclude or redact personal information from compliance reports published on the website; and e. where any personal information has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. Note: Compliance reports may be published on the Department's website.</p>	Compliant	<p>Correspondence from the Department (12 May 2021) included in letter reference no: 19/035533 noted that the first Annual Compliance Report is due to be published on the website by 4 August 2022. The action commenced on 11 May 2021. This Annual Compliance report is the first plan to be provided to the department. In accordance with condition 11 it will be published on the website within 60 business days. <i>(see appendix 1 – attached copy of the sent notification and response)</i></p>
12 & 13	<p>Reporting non-compliance</p> <p>12. The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: a. any condition which is or may be in breach; and b. a short description of the incident and/or non-compliance.</p> <p>13. The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a. any corrective action or investigation which the approval</p>	Compliant	<p>Watpac have asked LC to submit to the Department the non-compliant works to the basement ceiling (removal of additional lath and plaster ceilings).</p>

	holder has already taken or intends to take in the immediate future; b. the potential impacts of the incident or non-compliance; and c. the method and timing of any remedial action that will be undertaken by the approval holder.		
14, 15 & 16	<p>Independent audit</p> <p>14. The approval holder must ensure that an independent audit of compliance with the conditions is conducted for the three-year period from the commencement of the action and for each subsequent three-year period for the life of the approval, or as otherwise requested in writing by the Minister.</p> <p>15. For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b. only commence the independent audit once the audit criteria have been approved in writing by the Department; and c. submit an audit report to the Department within the timeframe specified in the approved audit criteria. <p>16. The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.</p>	Not Applicable	The action commenced on 11 May 2021. The first independent audit of compliance is due on the 11 May 2024.
	<p>Revision of Heritage Interpretation Plans</p> <p>17. The approval holder may, at any time, apply to the Department for a variation to a heritage interpretation plan approved by the Department under condition 4, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Department approves a revised Heritage Interpretation Plan (RHIP)</p>	Not Applicable	The Heritage Interpretation Plan (conditions 4,5 and 6) is yet to be submitted and accordingly, no revision is currently proposed.

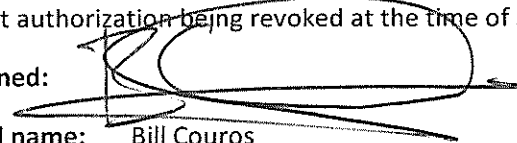
	<p>then, from the date specified, the approval holder must implement the RHIP in place of the previous heritage interpretation plan.</p> <p>18. The approval holder may choose to revise a heritage interpretation plan approved by the Department under condition 4, or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the RHIP is of substantially the same character.</p> <p>19. If the approval holder makes the choice under condition 18 to revise a heritage interpretation plan without submitting it for approval, the approval holder must: a. notify the Department in writing that the approved heritage interpretation plan has been revised and provide the Department with: i. an electronic copy of the RHIP; ii. an electronic copy of the RHIP marked up with track changes to show the differences between the approved heritage interpretation plan and the RHIP; iii. an explanation of the differences between the approved heritage interpretation plan and the RHIP; iv. the reasons the approval holder considers that the RHIP is of substantially the same character; and v. written notice of the date on which the approval holder will implement the RHIP (RHIP implementation date), being at least 20 business days after the date of providing notice 4 of the revision of the heritage interpretation plan, or a date agreed to in writing with the Department. b. subject to condition 21, implement the RHIP from the RHIP implementation date.</p> <p>20. The approval holder may revoke their choice to implement a RHIP under condition 18 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 18, the approval holder must implement the heritage interpretation plan in force immediately prior to the revision undertaken under condition 18.</p>		
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	<p>21. If the Department gives a notice to the approval holder that the Department is satisfied that the RHIP is not of substantially the same character, then: a. condition 18 does not apply, or ceases to apply, in relation to the RHIP; and b. the approval holder must implement the heritage interpretation plan specified by the Department in the notice.</p> <p>22. At the time of giving the notice under condition 21, the Department may also notify that for a specified period of time, condition 18 does not apply for one or more specified heritage interpretation plans. Note: conditions 18, 19, 20 and 21 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised heritage interpretation plan, at any time, to the Minister for approval. Completion of the action</p> <p>23. Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.</p>		
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Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorized to bind the approval holder to this declaration and that I have no knowledge of that authorization being revoked at the time of making this declaration.

Signed:



Full name: Bill Couros

Position: Senior Development Manager

Organisation: Greaton GPO Property Pty Ltd (CAN 621 676 597) ATF the Greaton GPO Property Unit trust (ABN 66 524 794 742)

Date: 11/ 05 /2022