



Heritage Strategy (Revised October 2020)

Australia Post Heritage Places

Corporate and Commercial Services – Group Property

AUSTRALIA POST HERITAGE STRATEGY

Revised October 2020

To be read in conjunction with the
AUSTRALIA POST HERITAGE PROCEDURES MANUAL

Prepared for the Department of the Agriculture, Water and the Environment

Cover image: Hobart GPO

| | |
|--|-----------|
| Australia Post | 6 |
| History | 7 |
| Heritage Places | 7 |
| EPBC Act | 8 |
| Commonwealth Heritage List | 8 |
| Commonwealth Heritage Values | 8 |
| Commonwealth Heritage Management Principles | 8 |
| What is a Heritage Strategy? | 8 |
| 2020 Revisions | 9 |
| Heritage Management Responsibility | 15 |
| Assessment of Australia Post Properties | 15 |
| Owned properties | 15 |
| Leased properties | 16 |
| Action 1 | 17 |
| Australia Post Heritage Places Register | 17 |
| Action 2 | 18 |
| Management Plans for Heritage Places | 18 |
| Management Plan Requirements & Methodology | 18 |
| Methodology..... | 19 |
| Action 3 | 19 |
| Risk Management | 20 |
| Action 4 | 20 |
| Corporate Planning | 21 |
| Action 5 | 21 |
| Heritage Strategy Funding | 21 |
| Action 6 | 22 |
| Monitoring & Review of Implementation | 22 |
| Internal Control Framework | 22 |
| Action 7 | 22 |
| Annual Reporting..... | 22 |
| Action 8 | 23 |
| Summary of annual report – Heritage programme | 23 |
| Reporting to the Minister | 23 |
| Action 9 | 24 |
| The Manual | 25 |
| Approvals | 25 |
| Action 10 | 26 |
| Property Divestment | 26 |
| Consultation | 27 |
| Existing Consultative Process | 27 |

| | |
|---|-----------|
| Indigenous Consultation | 28 |
| Other Government Agencies & Stakeholders | 28 |
| Conflict Resolution | 28 |
| Action 11 | 29 |
| Existing & Proposed Programmes | 30 |
| Action 12 | 31 |
| Appendix A: EPBC Act Definitions & Extracts | 32 |
| Commonwealth Heritage List Criteria (as per Reg 10.03A(2)) | 32 |
| Commonwealth Heritage Management Principles | 32 |
| Requirements for a Commonwealth Agency Register (as per Reg 10.03G(2)) | 33 |
| Management Plans for Heritage Places | 33 |
| Appendix B: EPBC Act Approvals | 35 |
| What is a referral? | 35 |
| Who can make a referral? | 35 |
| When do I need to make a referral? | 35 |
| Can I refer part of a larger action? | 35 |
| Do I need a permit? | 36 |
| What information do I need to provide? | 36 |
| Attachments/supporting information | 36 |
| How do I submit a referral? | 36 |
| What happens next? | 36 |
| Compliance audits | 37 |
| For more information | 37 |
| Appendix C: <i>Heritage Procedures Manual 2020</i>, Section 2.5 – EPBC ACT Referrals and Approvals | 38 |
| 2.5 EPBC ACT Referrals and Approvals | 38 |
| 2.5.1 Procedures under the EPBC Act | 38 |
| 2.5.2 How does the EPBC Act relate to other statutory heritage approvals? | 38 |
| 2.5.3 Advice stage | 39 |
| 2.5.4 Referral stage | 39 |
| 2.5.5 Approval stage | 40 |
| 2.5.6 Public access to assessment documents | 40 |

Preamble

The Australia Post *Heritage Strategy* was first published in December 2005, as a component of Australia Post's obligations under the Commonwealth *Environment Protection and Biodiversity Act* 1999. It was updated and revised both in 2009, and 2015 and has now been further updated. The revisions derive from a review of the *Strategy*, including a review of progress with implementation of the programmes and actions identified in 2005 (and as revised in 2009 and 2015); and from matters which have become evident through the practical implementation of the original *Strategy* programmes. The revisions include:

- Removal of completed programmes and actions
- Change to the timeframes for some programmes and actions
- Modification of the approach and methodology for some programmes

The format and content of the main component of this document remains largely consistent with that of the 2015 and 2009 *Heritage Strategies*, which in turn were largely consistent with the original 2005 document. The information contained in the appendices has also been reviewed and updated, where required.

Introduction

Amendments to the Commonwealth *Environment Protection and Biodiversity Act* 1999 (EPBC Act, introduced in January 2004) together with amendments to the *Environment Protection & Biodiversity Conservation Regulations* 2000 (the Regulations) introduced a new Commonwealth heritage management regime. The legislation established the National Heritage List and Commonwealth Heritage List, and a number of Australia Post properties were subsequently added to the latter list. A recent examination of the Commonwealth Heritage List reveals over 70 post offices owned by Australia Post included as 'listed' places.

Australia Post, as per Section 341ZA of the EPBC Act, prepared the *Heritage Strategy* in 2005 (updated in 2009, 2015 and 2020) to guide management of its properties included in the Commonwealth Heritage List, and those with Commonwealth Heritage values.

In addition to the places currently included in the Commonwealth Heritage List, many Australia Post properties are included in state or territory heritage registers, and/or subject to local government heritage controls (the *Australia Post Register* provides a comprehensive list of the all Australia Post Properties subject to statutory heritage controls). The *Heritage Strategy* applies to all properties with Commonwealth Heritage values, as well as those with state/territory and local heritage values.

Australia Post

Australia Post is a government business enterprise which operates under the *Australian Postal Corporation Act 1989*. The Board of Australia Post, which sets the corporation's objectives, policies and strategies, is led by a non-executive Chairman and comprises up to eight non-executive directors and one executive director, the Managing Director and CEO. The latter is responsible for the day-to-day management of the corporation, with a Senior Management Team responsible for key business and support functions, including:

- Communication Management Services.
- Parcel and Letter Services.
- Retail Services.
- Physical Network and Digital Network.
- Corporate Affairs and People.
- Finance and Business Services.

Group Property, which is included within Corporate and Commercial Services (a subset of Finance and Business Services), is responsible for implementing the *Heritage Strategy*.

History

The provision of postal services in Australia can be traced back to 1809, when former convict Isaac Nichols was appointed as the nation's first postmaster and subsequently opened a post office in his residence in George Street, Sydney. Nichols was responsible for collecting the mail from newly arrived ships. An early postal service was also established in Tasmania in 1809, with a dedicated post office established in Hobart in 1812. The more formal commercial origins of Australia Post, however, lie in the first *Postal Act* of 1825, which enabled the New South Wales governor to fix postage rates and appoint postmasters outside of Sydney.

Postal services were an important feature of Australian life from the early Colonial period. The mail was the only means of contact between Australia and Britain for much of the nineteenth century. Postal offices were also among the first infrastructure developed in each new colony and town. In 1849, the Australian colonies banded together to establish uniform postage rates and to try and achieve greater regularity in their services across borders. Between 1860 and 1900, in the lead up to Federation, a large number of inter-Colonial conferences were also held to discuss ways of making postal services and communications more efficient and cooperative.

The need to provide a common and uniform system of communications between the colonies was one of the key drivers behind Federation, and in 1900 the heads of each postal department met in Sydney to discuss the integration of the separate Colonial postal services under the new Commonwealth umbrella. The *Commonwealth Post and Telegraph Act* was passed in June 1902, and a national Postmaster General's Department (the PMG) was established, with responsibility for the nation's mail and telephone services.

The PMG amalgamated the various Colonial services, and some 5,000 existing post offices were placed under the control of the new Department. Shortages in funds and resources, however, meant that maintenance of existing buildings, and construction of new postal buildings, generally remained the responsibility of the various states up until the 1920s, although the PMG was more active in construction in New South Wales and Victoria before this time. New postal and telegraph offices were also a significant addition to city and country centres, and were frequently the first physical manifestation of the new Commonwealth Government. In 1975, the old PMG was replaced by a structure whereby responsibility for telephone and mail services was divided into the Australian Postal Commission (Australia Post) and the Australian Telecommunications Commission (formerly Telecom, now Telstra).

Heritage Places

Australia Post currently owns approximately 431 places, and leases an additional 1,089 places. These places include a rich and diverse range of heritage properties which are geographically dispersed across Australia, and comprise historic buildings from the Colonial era, through to post-Federation and more recent (post-WWII) structures. These buildings are used for the delivery of various postal and related services, including for administrative and retail purposes. Australia Post also owns properties that are leased out for other, non-postal related purposes.

The properties include grand and imposing public buildings, such as the General Post Offices (GPOs) in most of the state and territory capital cities. Also included are prominent nineteenth century buildings in the main streets of Australian regional centres, many of which have conspicuous clock towers. More modest early twentieth century postal buildings are additionally included in the heritage portfolio, and are distinctive buildings within their streetscapes and urban contexts. All of these buildings also have, to a greater or lesser degree, community or social value whereby they are valued by their local communities for both the services they offer, or have offered in the past, and often too for their architectural and built form qualities.

Changing technologies have also resulted in changes to postal buildings. The introduction of telegraph offices and telephone exchanges in the second half of the nineteenth century brought about alterations and extensions to many existing postal buildings. Changes in mail handling in the twentieth century have also physically impacted on postal properties, and resulted in the construction of new types of postal buildings. Since the 1980s, many existing postal buildings have been altered to accommodate a change in focus to a more commercial or retail style of postal service, while new outlets have been opened away from the traditional main street context, in the new and larger shopping centre complexes. As a result of these trends, many of Australia Post's older properties have become redundant which, in some cases, has led to their divestment.

This *Heritage Strategy* assists Australia Post to manage heritage places within its portfolio, including managing further change to heritage buildings, and ensuring the Commonwealth Heritage values are protected as part of the divestment process.

EPBC Act

The EPBC Act established the Commonwealth Heritage List, while the Regulations defined the Commonwealth Heritage values and heritage management principles.

Commonwealth Heritage List

The Commonwealth Heritage List, established under the EPBC Act, comprises natural, indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control. The List incorporates natural and cultural heritage places, including places connected to defence, communications, customs and other government activities that reflect Australia's development as a nation. Places on the List have been identified by the Minister as having Commonwealth Heritage values and are accordingly protected under the EPBC Act [note: where the 'Minister' is referred to throughout this document, the reference is to the Federal Minister for the Environment].

Commonwealth Heritage Values

Commonwealth Heritage values derive from aesthetic, historic, scientific or social significance or other special value for future generations as well as for the present community. The criteria relating to the values are set out in Part 10, Division 5, sub-regulation 10.03A (2) of the Regulations to the EPBC Act, and are reproduced in Appendix A.

As part of the *National Survey & Assessment of Australia Post (Owned) Heritage Properties*, completed in 2009, clarification was received from the Australian Heritage Council in regard to the threshold of significance for Commonwealth Heritage values, confirming that the values must be of at least a local level of significance or above.

Commonwealth Heritage Management Principles

The *Heritage Strategy* is consistent with, and underpinned by, Commonwealth heritage management principles (set out in Schedule 7B, as per Part 10, Division 5, sub-regulation 10.03D of the Regulations). These are broad principles which address objectives, standards, processes and practices, and provide a guiding framework for best practice in managing heritage properties. Australia Post adopts the principles in the preparation and implementation of management plans for heritage places (see below), and in the absence of a management plan, generally follows the principles in managing heritage places in its portfolio.

The Commonwealth Heritage management principles are reproduced in Appendix A.

What is a Heritage Strategy?

A heritage strategy is defined as:

... a written document that integrates heritage conservation and management within an agency's overall property planning and management framework. Its purpose is to help an agency manage and report on the steps it has taken to protect and conserve the Commonwealth Heritage values of properties under its ownership or control. An agency's Heritage Strategy should be consistent with Commonwealth Heritage management principles (Australian Government, *Working Together: Managing Commonwealth Heritage Places*, 2019, p.4).

Two key characteristics of a strategy, as identified in this definition, are *managing* and *reporting*; the recommended actions and outcomes of the 2005 *Heritage Strategy* supported these key requirements, and where necessary are reproduced/updated in this 2020 *Heritage Strategy*. The actions and outcomes also provide for the *steps* Australia Post will undertake in order to meet and manage its heritage obligations as outlined in this *Strategy*. These relate to internal

organisational arrangements for heritage place management; ensuring the processes and procedures for managing, mitigating impacts, monitoring and reporting on heritage places remain clear and well understood by property managers; and continuing to train staff and promote community awareness of Australia Post heritage places and their Commonwealth Heritage values.

The content and scope of the *Strategy* is also derived from the statutory Regulations, and documentation prepared by the Department of Agriculture, Water and the Environment:

- *Environment Protection and Biodiversity Conservation Regulations 2000, Schedule 7C, Regulation 10.03E.*
- Australian Government, *Working Together: Managing Commonwealth Heritage Places, 2019.*

2020 Revisions

As noted above in the 'Preamble', the revisions in the 2020 *Heritage Strategy* derive from a review of progress with implementation of the programmes and actions identified in 2005, and the updated 2009 and 2015 strategies; and from experience with the practical implementation of the original *Heritage Strategy* programmes. The revisions include:

- Removal and revision of completed programmes and actions
- Change to the timeframes for some programmes and actions
- Modification of the approach and methodology for some programmes

The changes (from 2005 to 2020) with regard to the *Strategy* programmes and actions are summarised below:

| 2005 Heritage Strategy Programme/Action | 2009 Heritage Strategy Programme/Action | 2015 Heritage Strategy Programme/Action | 2020 Heritage Strategy Programme/Action | Comments (Explanation) |
|--|---|---|---|--|
| Action 1 Include a 'Statement of Objectives' in Australia Post's Corporate Plan. | Completed/achieved, therefore removed from 2009 <i>Strategy</i> . | N/A | N/A | N/A |
| Action 2 Undertake a two-staged programme of assessment of Australia Post properties and identification of Commonwealth Heritage values. The two stages relate to properties owned (Stage 1) and leased (Stage 2) by Australia Post. | Action 1 Complete the assessment of heritage properties leased by Australia Post (previously Stage 2 of Action 2), to identify and assess the Commonwealth Heritage values. | Completed/achieved, therefore removed from 2015 <i>Strategy</i> . Reference to the assessment of properties has been retained. | Action 1 Undertake a desktop review of properties leased by Australia Post to identify places with statutory heritage controls and assess the potential Commonwealth Heritage values of each place. | Assessment of owned properties completed 2009; assessment of leased properties completed 2010. The assessment of leased properties is to be reviewed prior to the update of the next <i>Strategy</i> . |

| 2005 Heritage Strategy Programme/Action | 2009 Heritage Strategy Programme/Action | 2015 Heritage Strategy Programme/Action | 2020 Heritage Strategy Programme/Action | Comments (Explanation) |
|---|---|---|---|--|
| <p>Action 3</p> <p>Establish a <i>Register</i> of Australia Post heritage places, arising out of the assessment of places. Upon completion, lodge a copy of the Register with the Minister.</p> | <p>Action 2</p> <p>Continue to collate data for the <i>Register</i> of Australia Post heritage places, arising out of the assessment of places. Upon completion, lodge a copy of the Register with the Minister.</p> | <p>Action 1</p> <p>Lodge a copy of the <i>Australia Post Heritage Register</i> with the Minister.</p> | <p>Action 2</p> <p>Update the <i>Australia Post Heritage Register</i> and lodge a copy with the Minister.</p> | <p>Review of <i>Australia Post Heritage Register</i> completed with regard to owned properties in December 2019.</p> |
| <p>Action 4</p> <p>Initiate a programme of management plan preparation for Australia Post heritage places, and establish priorities for preparation/revision of management plans. Commence with properties currently included in the Commonwealth Heritage List.</p> | <p>Action 3</p> <p>Continue the programme of management plan preparation for Australia Post heritage places.</p> | <p>Action 2</p> <p>Continue the programme of management plan preparation for Australia Post heritage places.</p> | <p>Action 3</p> <p>Continue the programme of management plan preparation for Australia Post heritage places.</p> | <p>This is an ongoing programme which does not have a defined date of completion as it is subject to priorities which take into consideration development and divestment proposals for properties.</p> |
| <p>Action 5</p> <p>Identify risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc, and incorporate into Australia Post's existing risk management policy framework.</p> | <p>Action 4</p> <p>Continue to identify risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc.</p> | <p>Action 3</p> <p>Continue to identify risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc.</p> | <p>Action 4</p> <p>Continue to identify risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc.</p> | <p>No change to this Action.</p> <p>This programme is ongoing, with no end date.</p> <p>An annual audit of all properties is undertaken by Australia Post to assess the condition and identify priority places for required works.</p> |

| 2005 Heritage Strategy Programme/Action | 2009 Heritage Strategy Programme/Action | 2015 Heritage Strategy Programme/Action | 2020 Heritage Strategy Programme/Action | Comments (Explanation) |
|--|---|---|---|--|
| Action 6 Incorporate the <i>Heritage Strategy</i> programmes into Australia Post's corporate planning framework. | Action 5 Continue to incorporate the <i>Heritage Strategy</i> programmes into Australia Post's corporate planning framework. | Action 4 Continue to incorporate the <i>Heritage Strategy</i> programmes into Australia Post's corporate planning framework. | Action 5 Continue to incorporate the <i>Heritage Strategy</i> programmes into Australia Post's corporate planning framework. | No change to this Action. This programme is ongoing, with no end date. |
| Action 7 Identify funding requirements for the staged implementation of the <i>Heritage Strategy</i> programmes, and integrate with Australia Post's budget planning and allocations. | Action 6 Continue to identify funding requirements for the implementation of the <i>Heritage Strategy</i> programmes, and integrate with Australia Post's budget planning and allocations. | Action 5 Continue to identify funding requirements for the implementation of the <i>Heritage Strategy</i> programmes, and integrate with Australia Post's budget planning and allocations. | Action 6 Continue to identify funding requirements for the implementation of the <i>Heritage Strategy</i> programmes, and integrate with Australia Post's budget planning and allocations. | No change to this Action. This programme is ongoing, with no end date. Funding for works to heritage buildings is provided annually within Australia Post's capital and operational budgets. |
| Action 8 Utilise Australia Post's existing internal control framework to monitor and review Australia Post's performance on <i>Strategy</i> implementation, and compliance with EPBC Act responsibilities and obligations. | Action 7 Continue to utilise Australia Post's internal control framework to monitor and review Australia Post's performance on <i>Strategy</i> implementation, and compliance with EPBC Act responsibilities and obligations. | Action 6 Continue to utilise Australia Post's internal control framework to monitor and review Australia Post's performance on <i>Strategy</i> implementation, and compliance with EPBC Act responsibilities and obligations. | Action 7 Continue to utilise Australia Post's internal control framework to monitor and review Australia Post's performance on <i>Strategy</i> implementation, and compliance with EPBC Act responsibilities and obligations. | No change to this Action. This programme is ongoing, with no end date. |

| 2005 Heritage Strategy Programme/Action | 2009 Heritage Strategy Programme/Action | 2015 Heritage Strategy Programme/Action | 2020 Heritage Strategy Programme/Action | Comments (Explanation) |
|--|--|--|---|--|
| <p>Action 9</p> <p>Include a summary of major works to properties with Commonwealth Heritage values undertaken during the financial year, and provide a general overview of progress with implementation of <i>Heritage Strategy</i> programmes (Annual Report). Also provide an overview of funding for heritage places management in Australia Post's financial reporting component of the Annual Report.</p> | <p>Action 8</p> <p>Australia Post's National Heritage Advisor will prepare an annual internal report which includes a general overview of progress with implementation of <i>Heritage Strategy</i> programmes, including financial reporting on the allocation of funds for heritage buildings.</p> | <p>Action 7</p> <p>Australia Post's heritage responsibilities rest with the Head of Facilities Management in Property and Procurement. An internal report which includes a general overview of progress with implementation of <i>Heritage Strategy</i> programmes, including financial reporting on the allocation of funds for heritage buildings is prepared annually.</p> | <p>Action 8</p> <p>Australia Post's heritage responsibilities rest with the Head of Facilities Management in Group Property. An internal report which includes a general overview of progress with implementation of <i>Heritage Strategy</i> programmes is prepared annually. Include summary of prioritised works identified in the Annual Report.</p> | <p>This programme is ongoing, with no end date.</p> <p>The internal report is not included in Australia Post's Annual Report.</p> |
| <p>Action 10</p> <p>Initiate a triennial review of the 2005 <i>Heritage Strategy</i>, and Australia Post's performance in conserving Commonwealth Heritage values, including formalised reporting to the Minister.</p> | <p>Action 9</p> <p>Undertake a triennial review of the 2009 <i>Heritage Strategy</i>, and Australia Post's performance in conserving Commonwealth Heritage values, including formalised reporting to the Minister.</p> | <p>Action 8</p> <p>Undertake a triennial review of the <i>Heritage Strategy</i>, and Australia Post's performance in conserving Commonwealth Heritage values, including formalised reporting to the Minister.</p> | <p>Action 9</p> <p>Undertake a triennial review of the <i>Heritage Strategy</i>, and Australia Post's performance in conserving Commonwealth Heritage values, including formalised reporting to the Minister.</p> | <p>No change to this Action.</p> <p>This programme is ongoing, with no end date.</p> <p>This <i>Heritage Strategy</i> constitutes a triennial review of the 2015 <i>Heritage Strategy</i>.</p> <p>The <i>Heritage Strategy</i> will be reviewed every three years.</p> |

| 2005 Heritage Strategy Programme/Action | 2009 Heritage Strategy Programme/Action | 2015 Heritage Strategy Programme/Action | 2020 Heritage Strategy Programme/Action | Comments (Explanation) |
|---|--|---|--|--|
| <p>Action 11</p> <p>Prepare a <i>Heritage Procedures Manual</i> which addresses compliance issues, responsibilities, protocols and procedures, to do with works approvals, development, property divestment, consultation and conflict resolution.</p> | N/A | <p>Action 9</p> <p>Undertake a review of the <i>Heritage Procedures Manual</i> to update statutory information/requirements, and relevant Australia Post protocols and procedures, including those relating to leased heritage properties; and to improve the useability of the manual for Australia Post property managers.</p> | <p>Action 10</p> <p>Undertake regular reviews of the <i>Heritage Procedures Manual</i> to update statutory information/requirements and relevant Australia Post protocols and procedures, including those relating to leased heritage properties; and to improve the useability of the manual for Australia Post property managers.</p> | <p>No change to this Action.</p> <p>This programme is ongoing, with no end date.</p> |
| <p>Action 12</p> <p>Establish a staff training programme tailored to the management of Australia Post heritage places, including meeting Commonwealth heritage obligations.</p> | <p>Action 10</p> <p>Continue the ongoing education of Australia Post officers, in terms of their statutory heritage management obligations.</p> | <p>Action 10</p> <p>Continue the ongoing education of Australia Post officers, in terms of their statutory heritage management obligations.</p> | <p>Action 11</p> <p>Continue the ongoing education of Australia Post officers, in terms of their statutory heritage management obligations.</p> | <p>No change to this Action.</p> <p>This is the responsibility of the Head of Facilities Management in Group Property. The <i>Australia Post Heritage Procedures Manual</i> also assists in this regard.</p> |
| <p>Action 13</p> <p>Incorporate education and promotion of Commonwealth Heritage values and places, in existing and expanded Australia Post programmes.</p> | <p>Action 11</p> <p>Continue to incorporate education and promotion of Commonwealth Heritage values and places, in existing and expanded Australia Post programmes.</p> | <p>Action 11</p> <p>Continue to incorporate education and promotion of Commonwealth Heritage values and places, in existing and expanded Australia Post programmes.</p> | <p>Action 12</p> <p>Continue to incorporate education and promotion of Commonwealth Heritage values and places, in existing and expanded Australia Post programmes.</p> | <p>No change to this Action.</p> <p>This programme is ongoing, with no end date.</p> |

| Appendices | | | | |
|--|---|---|---|---|
| 2005 Heritage Strategy | 2009 Heritage Strategy | 2015 Heritage Strategy | 2020 Heritage Strategy | Comments (Explanation) |
| Appendix A Definitions & Extracts from the EPBC Act and Regulations | Appendix A Definitions & Extracts from the EPBC Act and Regulations | Appendix A Definitions & Extracts from the EPBC Act and Regulations | Appendix A Definitions & Extracts from the EPBC Act and Regulations | This appendix is reproduced and updated where required. |
| Appendix B Draft Citation Template | Appendix B EPBC Act Approvals | Appendix B EPBC Act Approvals | Appendix B EPBC Act Approvals | This appendix is reproduced and updated where required. |
| Appendix C Procedures for EPBC Act Approvals | N/A | N/A | N/A | Content addressed in the <i>Heritage Procedures Manual 2020</i> |
| Appendix D State, Territory & Local Government Heritage Controls & Approvals | N/A | N/A | N/A | Content addressed in the <i>Heritage Procedures Manual 2020</i> |
| Appendix E - | - | - | Appendix C Section 2.5 of <i>Heritage Procedures Manual 2020 – EPBC Act Referrals and Approvals</i> | This appendix has been reproduced from the <i>Heritage Procedures Manual 2020</i> |

Heritage Management

Australia Post will ensure that Commonwealth Heritage values are taken into consideration in all aspects of heritage places management, including in planning for future works, development, and property divestment. This will assist in establishing priorities for funding and works approvals; it will also assist with prioritising the preparation and completion of management plans for heritage properties.

Heritage Management Responsibility

In terms of the Australia Post corporate structure, heritage management responsibility rests with the Head of Facilities Management in Group Property, having overall responsibility for initiating and implementing the *Heritage Strategy* programmes, and for heritage management generally. The Head of Facilities Management also has responsibility to decide matters of conflict resolution and record reasons for decisions.

The Head of Facilities Management has day-to-day responsibility for administering and coordinating the *Strategy* programmes. While Australia Post outsources many components of the programmes to qualified and experienced heritage practitioners, the Head of Facilities Management oversees the programme of identification and assessment of the heritage values of Australia Post properties, the programme of preparation of management plans for heritage places, and implementation of the *Heritage Procedures Manual*. The Head of Facilities Management is also responsible for initiating and overseeing the triennial reviews of the *Heritage Strategy*, and requirements for reporting to the Minister.

Decisions which affect, or have the potential to affect, the Commonwealth Heritage values of Australia Post properties are referred to the Head of Facilities Management to determine if a formal referral is required under EPBC Act, and then to follow the legislative process, as appropriate. These initial inquiries come from state-based property portfolio managers, who have individual property control within the state-based framework. The requirement to refer to the Head of Facilities Management is made clear through the information contained in the Australia Post heritage places *Register* (which must be consulted in the first instance to determine if a property has Commonwealth or other heritage values), and the *Heritage Procedures Manual*. This requirement, and the procedures to be followed, is also conveyed to property managers through the Australia Post training programme (see below).

Assessment of Australia Post Properties

The assessment of Australia Post properties, to identify those with Commonwealth Heritage values, was a key undertaking of the 2005 Heritage Strategy, and has enabled Australia Post to meet a number of its most important obligations under the EPBC Act.

Owned properties

In 2009, Australia Post completed an Australia-wide survey and assessment of heritage properties which were owned by the Corporation. The methodology report and individual detailed property assessments and citations were forwarded to (then) DEWHA on 18 May 2009. At the conclusion of the assessment, datasheets were completed for 125 properties, and 60 properties (out of approximately 520 owned properties) were identified as having Commonwealth Heritage values, some of which were already included in the Commonwealth Heritage List as 'listed' or 'indicative' places.

The methodology report outlined in some detail the approach to the survey and assessment, including determining the relative level or threshold of the heritage values. The threshold was based on that originally described in the 2005 *Heritage Strategy* for Stage 1 of Action 2. However, following further advice from the Australian Heritage Council that the threshold of significance for Commonwealth Heritage values was of at least a local level of significance or above, 69 properties which had originally been assessed during the survey to be below the threshold, were reassessed and 17 properties were found to

have Commonwealth Heritage values. The reassessment of properties was undertaken in 2010 and a methodology report and datasheets were issued to (then) DEWHA in June 2010.

As a result of the national survey of properties owned by Australia Post, over 70 post offices are currently included as 'listed' places in the Commonwealth Heritage List, and their respective Commonwealth Heritage values are recognised in this listing.

Leased properties

Stage 2 of Action 2 of the 2005 *Heritage Strategy* also required an assessment of approximately 830 properties leased or 'controlled' by Australia Post, as per the EPBC Act definition; this assessment was completed in January 2010. The identification of leased properties subject to statutory heritage controls was undertaken as a desk-top based assessment, and did not involve a physical investigation of each of the properties. The assessment datasheets/citations therefore did not include an up-to-date description of the properties (including documenting modifications to properties, or an assessment of the current intactness and integrity of the properties), however a brief description was collated, based on available desk-top sources. The assessment identified approximately 42 leased properties as being of potential heritage interest, and approximately 29 as having (potential) Commonwealth Heritage value.

This revised approach to the physical investigation aspect of the assessment was a pragmatic response to the leasehold arrangements. In the first instance, a number of leased properties are subject to short-term leases. In these cases, where Australia Post operations (or 'control') may cease in the near future and the property will return to another use while remaining in private (non-Commonwealth) ownership, the EPBC Act obligations only apply for the (short) duration of the lease. Australia Post also frequently occupies only a portion of a leased property, and their operations may be limited to one or more spaces within a larger heritage building where there are other commercial tenants and operators, occupying and using other spaces.

A new action, 'Action 1', has been included in the 2020 *Strategy* which relates to the preparation of a desktop review of properties leased by Australia Post (a total of 1,089 places) to identify places with statutory heritage controls and assess the potential Commonwealth Heritage values of each place. The methodology for undertaking the assessment will be consistent with the initial assessment undertaken in 2010, and in some instances will involve a review of the previous 2010 assessment (for places on longer term leases). The outcome of the assessment will be the preparation (or revision) of datasheets/citations for each place identified as being subject to statutory heritage controls, and the identification of places which may have (potential) Commonwealth Heritage value. A list of these places, together with the datasheets/citations, will be held by the Head of Facilities Management and distributed to the state-based property managers. This will ensure that the statutory heritage controls and potential Commonwealth Heritage value are considered in the event that works may be proposed to a leased property. It is noted that Australia Post would require landlord approval prior to undertaking any works to leased properties, and would be unlikely to undertake major works to these buildings. Works are more likely to involve fitout modifications, signage and minor repairs/maintenance to enable the operation of the building or space as a postal outlet.

As with the 2010 assessment, it is not proposed to lodge the datasheets/citations completed as part of the assessment of leased properties with the Minister. Rather, individual leased property citations are proposed to be forwarded to the Department in the event of an EPBC Act referral in relation to the property, or at such time as the assessments might otherwise be required.

In recognition of the apparent limitation of the leased places assessment, Australia Post has committed to commissioning a heritage consultant to investigate a leased property (which has been assessed as having potential Commonwealth Heritage values) prior to any proposed works with potential heritage impacts, to provide an up-to-date description and physical analysis of the property, and advise on the works, including the mitigation of potential heritage impacts. Where an EPBC Act referral is then required in relation to the leased property, this up-to-date information (i.e., the assessment datasheet/citation) will be included in the referral documentation to inform the decision-making process. The process as identified in the *Heritage Procedures Manual* for EPBC Act Referrals and Approvals (at Appendix C) would be followed.

Action 1

| Action | Outcome | Priority | Timeframe |
|--|--|--|---|
| Undertake a desktop review of properties leased by Australia Post to identify places with statutory heritage controls and assess the potential Commonwealth Heritage values of each place. | Identification of leased properties which are subject to statutory heritage controls (local, state, or Commonwealth/National). | High To inform internal processes for the management of change (where proposed) within Australia Post's leased properties | To be undertaken within the next three years. |

Australia Post Heritage Places Register

Australia Post established a *Heritage Places Register* in March 2011, which was subsequently reviewed in October 2012. The requirements for a Commonwealth agency *Register* are set out in Part 10, Division 5, sub-regulation 10.03G (2) of the Regulations, and are reproduced in Appendix A.

The *Register* includes:

- all places in the Commonwealth Heritage List;
- all owned places identified in the assessment of Australia Post properties as having heritage values, including Commonwealth Heritage values, and those recommended for inclusion in the Commonwealth Heritage List; and
- any other Australia Post heritage places that have statutory heritage controls.

In addition, the Australia Post *Register* also contains:

- Information and data on individual places. This is tabulated in a heritage 'property citation' format, and addresses the 'matters' specified in the EPBC Act Regulations (see Part 10, Division 5, sub-Regulation 10.03G(2)). These matters include information relating to the administration of heritage places, heritage controls, location and access details, tenure, building descriptions, history, heritage significance (including relevant Commonwealth heritage criteria), indigenous values, works approvals information, images, plans, and relevant reports and archives. While the register citations do not include information in relation to works history and maintenance data, impacts of works, and management information, this data is collated as part of an annual condition audit and held in an electronic format.
- Information relating to management plans.
- Recommendations on specific heritage issues and aspects of property management.
- The *Register* is also used to provide information needed for monitoring and assessing the success of the Australia Post *Heritage Strategy* and for reporting annually in accordance with Section 516A (see below).

The *Register* is linked to existing Australia Post asset management data through the use of a common identifier, as is currently used in the Australia Post property management system.

Australia Post additionally keeps records associated with places included in the *Register*, including documentation relating to works and conservation of properties, this includes an annual audit which includes a conditions assessment and identification of where works may be required.

Australia Post lodge a copy of the recently updated heritage datasheets which form part of the *Register* with the Minister in accordance with Section 341ZB of the Act.

Action 2

| Action | Outcome | Priority | Timeframe |
|--|---|--|--|
| Update the <i>Australia Post Heritage Register</i> and lodge a copy with the Minister. | <i>Register</i> of Australia Post heritage places. Lodgement with the Minister | High Requirement of EPBC Act Regulations | The <i>Register</i> was completed in 2011, was reviewed and revised in 2012 and again in 2019. A report and copy of the <i>Register</i> has been lodged with the Minister in 2020. |

Management Plans for Heritage Places

A management plan:

... is a tool intended to help managers to conserve and protect the Commonwealth Heritage values of a place included in the Commonwealth Heritage List. It is a written document identifying in detail the heritage values of a place and the conservation policies to be followed (Australian Government, *Working Together: Managing Commonwealth Heritage Places*, 2019, p.20).

The survey and assessment of Australia Post heritage properties included the identification of existing (pre-EPBC Act) heritage reports and management plans relating to the properties. This information assists with prioritising the preparation of new or revised management plans for the properties, which address the requirements of the EPBC Act (the preparation of management plans is sanctioned under Section 341S of the Act). The Department has prepared *Working Together: Managing Commonwealth Heritage Place* to assist in understanding the management requirements for Commonwealth Heritage places.

Management plans will additionally be consistent with the direction and intent of the Commonwealth heritage management principles. Plans for a number of places may be contained in a single document, where appropriate (Section 341W of the Act). A review of plans is also required to be undertaken every five years (Section 341X of the Act).

The review and preparation of management plans has commenced, and is an ongoing task for those properties included in the Commonwealth Heritage List, and those assessed to have Commonwealth Heritage values. The timeframe and order for completion of management plans takes divestment proposals into consideration, and gives priority to properties without plans and for which development and/or divestment is proposed.

The timeframe for completion of the plans will additionally allow for public notification and consultation, with plans uploaded onto the Australia Post website being the recommended means of providing opportunities for public comment and feedback on the plans.

Management Plan Requirements & Methodology

Management plans establish the significant heritage elements, characteristics and values of a place, and detail appropriate policies to manage and conserve the elements and values for future use and appreciation. Generally, a management plan will:

- identify and clarify the property's heritage values (which may be physical, spatial, associated with landscape, or items or artefacts associated with a place);
- identify the constraints and opportunities that the heritage values may place on the management and use of a property;
- identify what the owner is required or wishes to do regarding its use, including possible future use or disposal; and
- seek to balance this information and these imperatives through including policies and strategies which help to achieve compatible outcomes.

Management plans provide guidance on new works and identify options or alternatives, where appropriate. Under the EPBC Act, management plans must also address certain criteria such as access and security issues, and protocols to ensure Indigenous and other community members are consulted. Plans should additionally allow for ongoing technical and community input to decisions and actions that may have a significant impact on a place's heritage values. Management plans should also promote integrated Commonwealth, state, territory and local government responsibilities for heritage place management, and provide for appropriate use and presentation of the place and its Commonwealth Heritage values.

Methodology

Australia Post, in preparing management plans, endorses the following established methodology:

- Gather and analyse evidence
 - historical research
 - physical investigation and analysis
 - identify/contact groups with an interest in the place
- Identify and describe the heritage values, including a statement of significance
- Develop policies
 - identify obligations and constraints arising from the values
 - identify other factors that impact on heritage place management including policies to deal with known proposals and actions
 - identify a process to interpret the heritage values
- Implement plan and policies
 - recommend a strategy for plan implementation
 - manage place in accordance with plan
 - monitor and review plan implementation

Appendix A contains additional information relating to management plans and their context and approach.

Action 3

| Action | Outcome | Priority | Timeframe |
|---|---|---|---|
| Continue the programme of management plan preparation for Australia Post heritage places. | Management plans for Australia Post Commonwealth Heritage places. | High Requirement of EPBC Act Regulations | This is an ongoing programme which does not have a defined date of completion as it is subject to priorities which take into consideration development and divestment proposals for properties. |

Risk Management

Australia Post will continue to identify all risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc. The identification of risks will also help to identify whether there is conflict, or potential conflict, between conservation of the heritage significance/heritage values of places, and existing or proposed uses.

Risk management involves internal consultation between Australia Post property managers and the Head of Facilities Management, on operational and planning matters to do with specific heritage buildings. This process is informed by an annual audit undertaken by Australia Post's facilities managers, Cushman and Wakefield which includes a condition assessment of each building and assists with planning for required works. While this process is not necessarily formalised within the corporation's risk management policy framework, it is practically effective.

Action 4

| Action | Outcome | Priority | Timeframe |
|---|-------------------------------------|----------|--|
| Continue to identify risks to heritage places, including risks arising out of management practices, existing and proposed operational uses, budgetary constraints, etc. | Risk management of heritage places. | Medium | This programme is ongoing, with no end date. |

Strategy Implementation

Australia Post will continue to ensure that the Corporate Plan, at the relevant programme level, addresses and makes provision for implementation of the *Heritage Strategy*. The timeframe for implementation recognises that some actions can be activated and implemented in the short term, while other actions (such as the completion of management plans) will be undertaken over a longer period.

Corporate Planning

An outline of how the *Heritage Strategy* programmes, and responsibility for heritage places management, will operate within the Australia Post corporate structure is provided elsewhere in this document.

Action 5

| Action | Outcome | Priority | Timeframe |
|---|--|---|--|
| Continue to incorporate the <i>Heritage Strategy</i> programmes into Australia Post's corporate planning framework. | Integration of the <i>Heritage Strategy</i> and its programmes into Australia Post's corporate planning framework. | Medium Requirement of EPBC Act Regulations | This programme is ongoing, with no end date. |

Heritage Strategy Funding

Australia Post will continue to provide funding for the implementation of the *Heritage Strategy* and its programmes. Australia Post allows for a provision in the Financial Operating Plan (FOP) to support the implementation of the *Heritage Strategy* and its recommended programmes and outcomes. Funding will also be identified in Australia Post's financial reporting processes, including audited annual reports. The latter will also summarise major works to properties with Commonwealth Heritage values undertaken during the financial year. The annual building audits undertaken by Australia Post identify any works that are required and allows these buildings to be categorised to ensure sufficient funding is allocated from the annual capital works and operational budgets.

Funding will continue to be allocated to support the implementation (in part or in full) of a number of remaining or ongoing *Heritage Strategy* programmes and actions, including:

- Undertake a desktop review of properties leased by Australia Post to identify heritage listed properties and assess the potential Commonwealth Heritage values of each place.
- Undertake regular reviews of the *Heritage Procedures Manual* to update statutory information/ requirements and relevant Australia Post protocols and procedures, including those relating to leased heritage properties; and to improve the useability of the manual for Australia Post property managers.
- Preparation or review of heritage management plans for heritage properties where required, including for state GPOs and others.
- Preparation of a triennial review of the *Heritage Strategy*, and of the *Triennial Report* to the Minister (January 2020).
- Incorporating programmes and pages in the Australia Post website which are used for promotion and education in relation to the history and heritage of Australia Post.
- The undertaking of maintenance or works identified in the annual audit as required.

Action 6

| Action | Outcome | Priority | Timeframe |
|--|---|---|----------------------------|
| Continue to identify funding requirements for the implementation of the <i>Heritage Strategy</i> programmes and integrate with Australia Post's budget planning and allocations. | Funding for the staged implementation of the <i>Heritage Strategy</i> . | High Requirement of EPBC Act Regulations | This programme is ongoing. |

Monitoring & Review of Implementation

The Australia Post *Heritage Strategy* provides for regular monitoring, review and reporting on the implementation of the *Strategy* programmes, and the conservation of Commonwealth Heritage values. The EPBC Act (Section 341ZA) also requires the *Heritage Strategy* to be subject to review every three years, and a written report submitted to the Minister on the outcome of the review.

Internal Control Framework

Australia Post has an established 'internal control framework' which covers a range of responsibilities, objectives, activities and business units and processes. The framework addresses financial, operational and compliance elements, and includes financial planning and reporting, due diligence examination, contract tendering, senior management review forums, external performance reporting and corporation-wide risk management practices. Australia Post will continue to utilise the 'internal control framework' as a mechanism to monitor and review performance with regard to implementation of the *Heritage Strategy*, and general compliance with organisational responsibilities and obligations under the EPBC Act.

Action 7

| Action | Outcome | Priority | Timeframe |
|--|--|--|--|
| Continue to utilise Australia Post's internal control framework to monitor and review Australia Post's performance on <i>Strategy</i> implementation, and compliance with EPBC Act responsibilities and obligations. | A formal monitoring and review mechanism within Australia Post, regarding <i>Strategy</i> implementation, and EPBC Act compliance. | Ongoing Requirement of EPBC Act Regulations | This programme is ongoing, with no end date. |

Annual Reporting

Australia Post's Head of Facilities Management in Group Property will prepare an annual internal report which includes a general overview and summary of progress with implementation of *Heritage Strategy* programmes, including financial reporting on the allocation of funds for heritage buildings.

The report will include a list of current or expected development, works, disposal or other proposals which may have an effect on Commonwealth Heritage Values in accordance with Schedule 7C 3(d), Regulation 10.03E of the EPBC Act.

Action 8

| Action | Outcome | Priority | Timeframe |
|--|---|---|--|
| Australia Post's heritage responsibilities rest with the Head of Facilities Management in Group Property. An internal report which includes a general overview of progress with implementation of <i>Heritage Strategy</i> programmes is prepared annually. Include summary of prioritised works identified in the Annual Report. | Annual internal reporting on heritage management and funding. | High Requirement of EPBC Act Regulations | This programme is ongoing, with no end date. |

Summary of annual report – Heritage programme

| Post Office | Current or expected development, works, disposal or other proposals which may have an effect on Commonwealth Heritage Values | Anticipated date |
|----------------------|--|------------------|
| Broken Hill PO (NSW) | Maintenance / development / works | 2020 - 2023 |
| Euroa PO (VIC) | Maintenance / development / works | 2020 - 2023 |
| Hamilton PO (VIC) | Maintenance / development / works | 2020 - 2021 |
| Traralgon PO (VIC) | Maintenance / development / works | 2020 - 2022 |
| Northam PO (WA) | Maintenance / development / works | 2020 - 2021 |
| Kyneton PO (VIC) | Maintenance / development / works | 2021 - 2023 |
| Castlemaine PO (VIC) | Maintenance / development / works | 2021 - 2023 |
| Tumut PO/DC (NSW) | Maintenance / development / works | 2022 - 2023 |
| Brisbane GPO (QLD) | Possible disposal | 2020 - 2023 |

Reporting to the Minister

Australia Post will prepare a triennial report which is lodged with the Minister on the progress of the *Heritage Strategy* implementation; this has recently been prepared and completed in regard to the revised 2015 *Heritage Strategy*. The report incorporates the following components (as specified under the EPBC Act regulations, Part 10, Division 5, Regulation 10.03F):

- A. An outline of consultation undertaken with relevant stakeholders in the review process.
- B. A summary of Australia Post's achievements against its objectives for management of its heritage places.
- C. An evaluation of the success of each of the matters included in the *Heritage Strategy* in achieving the identification, protection, conservation and presentation of Commonwealth and other heritage values.

- D. An update on the extent to which the identification and assessment of Commonwealth Heritage values of all property has been achieved, and the values included in Australia Post's heritage places *Register*.
- E. An update on the progress and timeliness of the preparation of management plans for Australia Post's Commonwealth Heritage places.
- F. An outline of any physical and management changes that have occurred to Australia Post's Commonwealth Heritage places since the *Strategy* was prepared and of any expected changes.
- G. An update on progress with Commonwealth heritage training programs.
- H. A specification of the timeframe for updating the *Heritage Strategy* following the review.
- I. An update on other heritage issues relevant to Australia Post's management of Commonwealth Heritage places in accordance with the Commonwealth heritage management principles.

Australia Post will also provide a copy of this *Heritage Strategy* to the Minister, as per the requirement of the EPBC Act.

Action 9

| Action | Outcome | Priority | Timeframe |
|---|--|---|--|
| Undertake a triennial review of the <i>Heritage Strategy</i> , and Australia Post's performance in conserving Commonwealth Heritage values, including formalised reporting to the Minister. | Report to the Minister, based on the statutory review process required under the EPBC Act. | High Requirement of EPBC Act Regulations | The <i>Heritage Strategy</i> will be reviewed every three years. |

Heritage Procedures Manual

To assist with aspects of the implementation of the *Heritage Strategy*, Australia Post prepared a detailed *Heritage Procedures Manual* (October 2020). While this is not a specific requirement of the EPBC Act, it was nevertheless recognised as fundamental to supporting the *Heritage Strategy* and ensuring that Australia Post implements and maintains an effective heritage management framework.

The Manual

The *Heritage Procedures Manual* summarises and clarifies heritage compliance issues, responsibilities, protocols and procedures, and addresses issues to do with obtaining approval for works and development, divestment, consultation and conflict resolution. The *Heritage Procedures Manual* also set out the steps to be followed, prior to proposed works on places with Commonwealth Heritage values. The *Heritage Procedures Manual* is therefore a reference tool which is relied upon by Australia Post, in conjunction with specialist heritage advice obtained (where necessary) by the Head of Facilities Management in Group Property or the state-based property managers.

The protocols and procedures outlined in the *Heritage Procedures Manual* ensure that:

- Heritage issues are identified early in project planning stages, so that impacts on heritage places and values are minimised, as a result of proposed development or other significant changes to places.
- All legislative compliance issues are addressed with regard to heritage management obligations.
- Advice is sought from qualified heritage practitioners and, if necessary, the Heritage Division of the Department to help identify heritage issues and following on from that, options for managing change while still protecting the heritage values of the property.
- Relevant and appropriate consultation is undertaken prior to works or redevelopment of heritage places, as part of Australia Post's property management and planning processes.
- Conflict is avoided and/or resolved, where it occurs during any of the above processes.

Approvals

The *Heritage Procedures Manual* provides guidance on the steps to be followed for obtaining approvals for proposed works to Australia Post's heritage places, including the procedures to be followed through Commonwealth, state, territory and local government authorities, as required.

For heritage properties leased by Australia Post, which are assessed to have Commonwealth Heritage values, the steps outlined here for works approvals under the EPBC Act differ to those for properties owned by Australia Post. This reflects the fact that the leased properties have not been physically inspected or documented in detail as part of the assessment process, and also takes into consideration the additional requirements of gaining landlord approval for works.

Therefore for leased properties, in the event that works are proposed which would potentially have a significant impact on the property and its values (i.e. a controlled action) the following steps will be followed:

1. Australia Post would consult with the landlord in relation to the proposed works, and gain approval to undertake the proposed works.
2. Australia Post will then appoint a heritage practitioner to physically investigate/inspect the leased property in the context of the proposed works.

3. The heritage practitioner will provide an up-to-date description of the property and through this, confirm or clarify the earlier desk-top based assessment of the property; the heritage practitioner will also review the proposed works and comment on whether they are acceptable from a heritage perspective.
4. Depending on the outcome of the above, the heritage practitioner will provide Australia Post with advice on how best to mitigate or avoid any potential impacts associated with the works. The heritage practitioner would also provide advice in relation to the relevant statutory approvals processes.
5. Where the works are considered to be a controlled action, Australia Post will make a referral under the EPBC Act, and include with the documentation the most up-to-date information on the property and its Commonwealth Heritage values (i.e. the individual property citation/datasheet) as confirmed by the heritage practitioner.
6. The process as identified in the *Heritage Procedures Manual* for EPBC Act Referrals and Approvals would then be followed.

See Appendix C –*Heritage Procedures Manual 2020* – Section 2.5 EPBC Act Referrals and Approvals.

Action 10

| Action | Outcome | Priority | Timeframe |
|--|---|---|--|
| Undertake regular reviews of the <i>Heritage Procedures Manual</i> to update statutory information/ requirements and relevant Australia Post protocols and procedures, including those relating to leased heritage properties; and to improve the useability of the manual for Australia Post property managers. | Updated and more useable (user-friendly) <i>Heritage Procedures Manual</i> which reflects current statutory requirements, and protocols and procedures for dealing with heritage properties, including leased properties. | Medium This requires regular updating to reflect statutory changes | Early 2020, with periodic review and updating on a 6 to 12 month cycle |

Property Divestment

Australia Post ensures that the Commonwealth Heritage values of properties are protected prior to divestment of a property. This occurs for all properties with identified Commonwealth Heritage values, be they included in the Commonwealth Heritage List, nominated for the List, or identified as having potential for inclusion in the List. The objective is to recognise the need to provide ongoing protection of the heritage values of the property, once it leaves Commonwealth ownership.

To date, for properties divested (sold) between the preparation of the original 2005 *Heritage Strategy* and the subsequent revisions (2009 and 2015), the following steps and protocols have been followed. The protocols have also been agreed in consultation with officers of the Department, as an appropriate means of ensuring that Australia Post meets its obligations under the EPBC Act.

1. Australia Post commissions a Management Plan (or Conservation Management Plan) for the property (where required), prepared in accordance with the EPBC Act. The plan identifies all relevant heritage constraints and statutory requirements, and provides guidance on future management and conservation actions for the building. The plan also includes adaptive re-use guidelines and, where appropriate (depending on the level and nature of the significance of the property), recommendations on appropriate heritage interpretation.
2. Australia Post ensures that the contract of sale for the property refers to the Management Plan, and that the new owner is provided with a copy of the plan.
3. As per Section 341ZE of the EPBC Act, Australia Post forwards correspondence to the Department by way of a notice to the Minister, to advise of the intention to sell a post office.
4. The correspondence:

- a. identifies all relevant statutory heritage controls which apply to the property, including the Commonwealth Heritage List control/status, as well as local or state level controls; and
 - b. identifies the Commonwealth Heritage values.
5. As a means of demonstrating how the heritage values of the property will be protected post-divestment, the correspondence advises the Department that a Management Plan has been commissioned for the property, and provides a summary of the ongoing heritage protection framework including the works approvals process which applies under the relevant (non-EPBC Act) local or state level heritage controls.
6. In the instance where the property is subject to local or state heritage controls, Australia Post will ensure that the Management Plan is lodged with the relevant authority (state or local) prior to the property being divested.
7. Where a property proposed for divestment does not have (non-EPBC Act) local or state level heritage controls, Australia Post will seek to establish an appropriate level of control for the property. This will also be communicated to the Minister, via the Section 341ZE correspondence. Note: Australia Post does not seek to place a covenant on the property.

Consultation

Australia Post recognises that public and community consultation is a means of encouraging community involvement in heritage management and the heritage conservation process generally. Consultation with other government agencies (at Commonwealth, state/territory, and local government level) is also required. This will generally occur when works are proposed to a property, or during the preparation and development of Management Plans for individual Australia Post heritage properties, and is recognised as a means of drawing on any additional knowledge or experience of a property. Consultation may also assist in resolving conflict over management of heritage places through identifying possible issues and addressing them in the plans.

With regard to Management Plans prepared for properties with Commonwealth Heritage values, as per EPBC Act requirements, Australia Post proposes to upload the plans onto the Australia Post web site, in order to provide opportunities for public comment and feedback on the plans.

Australia Post also consults local communities when works are proposed (through statutory approvals advertising processes) or in the instance it is proposed to divest or vacate a building.

Existing Consultative Process

Australia Post currently undertakes a range of community consultation, including maintaining community contacts, on a number of postal-related matters. The corporation also has a formal framework for managing community consultation.

Australia Post recognises that it may also be necessary to undertake consultation prior to a major development or works program in relation to a heritage property. This can be done through the existing Australia Post framework for handling community consultation, which outlines requirements for early communication of the reasons for change, investigation of local community needs, consultation with local stakeholders, analysis of community feedback and timeframes for consultation. The process is designed to ensure that community views and special needs are considered and taken on board.

Community consultation may not be required for works such as building maintenance, generally minor alterations, or where an EPBC Act referral is not required. Community consultation should also not be necessary where works have been through a referral process, and an approval is not required. This indicates that the proposed works have been assessed to not have significant impacts.

If the proposed works are of a more substantial nature, then consultation will be undertaken in the following way:

- Identify any stakeholders, interest groups, etc, with particular interest in the subject property, or who may be affected by management of, and changes to, the place. At a minimum, stakeholders will include:
 - The National Trust of Australia branch in each state and territory.

- The local historical society or local heritage interest group (where such exists) in each local government area.
- Have regard for any submissions or public comments received on the proposal, as a result of the referral for the property being posted on the Departmental website (for a 10-day public comment period).
- Consult the Management Plan for the property to determine if consultation has already occurred and address the issues raised as a result of this particular proposal.
- Document the steps taken to acknowledge and address the matters raised in the consultation. A heritage practitioner may assist in this process.

The *Heritage Procedures Manual* also ensures that consultation in relation to heritage practice and management is consistent with the existing Australia Post consultative process and framework.

Indigenous Consultation

Australia Post recognises that some heritage places have Indigenous heritage values, and in these instances Indigenous people will be invited to have input into decisions regarding management of the relevant heritage place. These values, and related management issues, will be also be explored in the preparation of Management Plans for relevant places, with Indigenous people invited to contribute to the development of the plans. The *Heritage Procedures Manual* additionally identifies an appropriate process for consultation with Indigenous people.

Other Government Agencies & Stakeholders

The *Heritage Procedures Manual* outlines a process for consultation with relevant stakeholders including liaison with other government agencies on heritage matters. This includes where consultation is required at Commonwealth, state/territory, and local government level, as part of any permit or works approvals process.

Conflict Resolution

Australia Post recognises that internal conflicts may arise in terms of the management of properties with Commonwealth Heritage values, particularly where there are Australia Post operational requirements (and works proposals) in potential conflict with heritage conservation needs. The potential for this is investigated in the early stages of the works planning process, through internal consultation with the Australia Post Head of Facilities Management in Group Property. Where appropriate, advice is also sought from the relevant statutory authority. Management Plans for heritage places additionally address the potential for conflict and provide appropriate recommendations.

As noted previously, all Australia Post decisions which affect, or have the potential to affect, the Commonwealth Heritage values of properties are referred to the Head of Facilities Management to determine if further heritage advice is required, or a formal referral is required under the EPBC Act. These initial inquiries come from state-based property portfolio managers, who have individual property control within the state-based framework.

The protocols and procedures which are followed in relation to addressing potential conflict are as follows:

- Heritage issues are identified early in project planning stages, so that impacts on heritage places and values are minimised, as a result of proposed development or other significant changes to places; consultation with local councils is typically undertaken in the planning stages of a project.
- All legislative compliance issues are addressed with regard to heritage management obligations.
- Advice is sought from qualified heritage practitioners to help identify heritage issues and following on from that, options for managing change while still protecting the heritage values of the property.
- Relevant and appropriate consultation is undertaken prior to works or redevelopment of heritage places, as part of Australia Post's property management and planning processes.
- Conflict is avoided and/or resolved, where it occurs during any of the above processes.

Training

Australia Post ensures that relevant personnel are made aware of the corporation's obligations under the EPBC Act, and the requirements of managing heritage places under the Commonwealth heritage management regime. It is also recognised that specific officers, with more direct involvement in property management, may need to receive more targeted training. Indigenous heritage values are also addressed in training, where relevant.

The ongoing education of Australia Post officers, in terms of their statutory heritage management obligations, is the primary responsibility of the Australia Post Head of Facilities Management in Group Property.

Action 11

| Action | Outcome | Priority | Timeframe |
|---|--|---|--|
| Continue the ongoing education of Australia Post officers, in terms of their statutory heritage management obligations. | Appropriate staff trained and aware of the corporation's heritage obligations. | Medium Requirement of EPBC Act Regulations | This programme is ongoing, with no end date. |

Education & Promotion

Australia Post will continue to promote public and community awareness about its heritage places, and about Commonwealth Heritage values and their management, through a number of existing and proposed programmes.

Existing & Proposed Programmes

Existing education and promotion programmes include the following:

- Australia Post currently engages in education in a number of ways, including through the publication of children's books and stamps, and through Australia Post's education website (www.auspost.com.au/education). The latter provides a range of resources for students and teachers relating to aspects of Australia Post's history, such as the role of the postal service.
- Australia Post participates in post-related exhibitions at Australian museums, as a means of promoting an interest in postal history and services.
- Heritage interpretation information is already included in some heritage places including the General Post Offices of capital cities. Management Plans for Australia Post heritage properties, as prepared under the EPBC Act, also contain recommendations on interpretation of the properties.

Australia Post programmes, undertaken since the 2005 *Heritage Strategy*, include:

- September 2007: a set of postage paid envelopes was released showcasing some of Australia Post's important heritage buildings.
- September 2008: the new Australia Post National Heritage Properties web page was launched on Australia Post's external internet site. The site features aspects of Australia Post's history, an overview of heritage properties, the *Strategy* which governs this responsibility, and photographs with details of each property. Different heritage properties are also added to be showcased on the 'Property of the Month' site.
- November 2008: an A3 size colour 2009 calendar highlighting Australia Post's heritage buildings was published through Australia Post outlets. The following Post Offices were showcased: Camperdown PO (VIC), Maryborough PO (VIC), Kyneton PO (VIC), Port Pirie PO (SA), Kiama PO (NSW), Northam PO (WA), Forbes PO (NSW), Stanthorpe PO (QLD), Flemington PO (VIC), Charters Towers PO (QLD), Kempsey PO (NSW), Glen Innes PO (NSW), and North Hobart PO (TAS).
- 2009: a postage paid envelope that highlights Australia Post's heritage properties was released.
- 2009: *Celebrating 200 Years* website launched, which includes a history of Australia Post, copies of 2000 original letters held by Australians to create an online account of the nation's history; and the entries for a short film competition, 200 Seconds.
- March 2009: a stamp was released in to commemorate the Australia Post bicentenary celebrations.
- November 2018: Open House at Hobart GPO
- June 2019: Open House at Launceston Post Office
- April: ANZAC Day celebrations on the rooftop of the Traralgon Post Office (specifically designed for this purpose)
- Ongoing: promotion of heritage works to local post offices in the local media and the Post Journal which is issued to all Australia Post employees.

- Ongoing: Heritage buildings frequently used in promotional material and advertising programmes prepared for Australia Post

Action 12

| Action | Outcome | Priority | Timeframe |
|---|--|--|--|
| Continue to incorporate education and promotion of Commonwealth Heritage values and places, in existing and expanded Australia Post programmes. | Australia Post heritage places used as a focus of education and promotion programmes, including children and schools programmes, exhibitions, onsite interpretation, philatelic operations, museums, galleries, etc. | Low Requirement of EPBC Act Regulations | This programme is ongoing, with no end date. |

Appendices

Appendix A: EPBC Act Definitions & Extracts

Commonwealth Heritage List Criteria (as per Reg 10.03A(2))

The Commonwealth Heritage criteria for a place are any or all of the following:

- A. the place has significant heritage value because of the place's importance in the course, or pattern, of Australia's natural or cultural history;
- B. the place has significant heritage value because of the place's possession of uncommon, rare or endangered aspects of Australia's natural or cultural history;
- C. the place has significant heritage value because of the place's potential to yield information that will contribute to an understanding of Australia's natural or cultural history;
- D. the place has significant heritage value because of the place's importance in demonstrating the principal characteristics of:
 - a. a class of Australia's natural or cultural places; or
 - b. a class of Australia's natural or cultural environments;
- E. the place has significant heritage value because of the place's importance in exhibiting particular aesthetic characteristics valued by a community or cultural group;
- F. the place has significant heritage value because of the place's importance in demonstrating a high degree of creative or technical achievement at a particular period;
- G. the place has significant heritage value because of the place's strong or special association with a particular community or cultural group for social, cultural or spiritual reasons;
- H. the place has significant heritage value because of the place's special association with the life or works of a person, or group of persons, of importance in Australia's natural or cultural history;
- I. the place has significant heritage value because of the place's importance as part of Indigenous tradition.

Commonwealth Heritage Management Principles

The Commonwealth Heritage management principles emphasise the identification, protection, conservation, presentation and transmittal of the heritage values of places, and use of appropriate knowledge, skills and standards in managing heritage places. The principles also seek to share responsibility for management, where appropriate, to undertake community consultation and encourage community involvement in heritage management; and to ensure regular monitoring, review and reporting on the conservation of Commonwealth Heritage values.

The principles are as follows:

1. The objective in managing Commonwealth Heritage places is to identify, protect, conserve, present and transmit, to all generations, their Commonwealth Heritage values.
2. The management of Commonwealth Heritage places should use the best available knowledge, skills and standards for those places, and include ongoing technical and community input to decisions and actions that may have a significant impact on Commonwealth Heritage values.
3. The management of Commonwealth Heritage places should respect all heritage values of the place and seek to integrate, where appropriate, any Commonwealth, State, Territory and local government responsibilities for those places.
4. The management of Commonwealth Heritage places should ensure that their use and presentation is consistent with the conservation of their Commonwealth Heritage values.
5. The management of Commonwealth Heritage places should make timely and appropriate provision for community involvement, especially by people who:

- a. have a particular interest in, or associations with, the place; and
 - b. may be affected by the management of the place;
6. Indigenous people are the primary source of information on the value of their heritage and the active participation of indigenous people in identification, assessment and management is integral to the effective protection of indigenous heritage values.
7. The management of Commonwealth Heritage places should provide for regular monitoring, review and reporting on the conservation of Commonwealth Heritage values.

Requirements for a Commonwealth Agency Register (as per Reg 10.03G(2))

The EPBC Regulations, at 10.03G(2), specify for paragraph 341ZB(2)(b) of the Act, that the 'matters' that a Register must include are the following:

- A. A comprehensive description and a clear plan showing the name and location, of each place that has Commonwealth Heritage values.
- B. A discrete heritage place identification number for each place.
- C. Details of ownership, leases, licences, rental or other tenure arrangements, as applicable.
- D. A summary description of the significant physical characteristics and elements of the place.
- E. A sequential summary of the use of the place.
- F. A statement of significance for the place, identifying its heritage values and specifying any that are Commonwealth Heritage values.
- G. A record of any other heritage listings, providing relevant register numbers.
- H. A record of the date and nature of any works, maintenance or other activity at the place that is relevant to conservation of its heritage values.
- I. A specification of any property or information access restrictions or requirements.
- J. An outline of any consultation requirements relating to the place.
- K. A list of relevant conservation documents or references.
- L. A record of when information has been updated.
- M. Cross references to:
 - a. agency place records of any objects that are significant by association with the place, indicating their current location; and
 - b. archived records of particular importance to the heritage values of the place.

Management Plans for Heritage Places

Schedule 7A to the EPBC Regulations (as per Regulation 10.03B) specify that a Management Plan for Commonwealth Heritage places must include the following information. Each point is described in more detail in the guidelines, *Management Plans for Places on the Commonwealth Heritage List: a guide for Commonwealth agencies* (November 2006):

- a) Establish objectives for the identification, protection, conservation, presentation and transmission of the Commonwealth Heritage values of the place.
- b) Provide a management framework which includes reference to any statutory requirements and agency mechanisms for the protection of the Commonwealth Heritage values of the place.
- c) Provide a comprehensive description of the place, including information about its location, physical features, condition, historical context and current uses.
- d) Provide a description of the Commonwealth Heritage values and any other heritage values of the place.
- e) Describe the condition of the Commonwealth Heritage values of the place.
- f) Describe the method used to assess the Commonwealth Heritage values of the place.

- g) Describe the current management requirements and goals, including proposals for change and any potential pressures on the Commonwealth Heritage values of the place.
- h) Have policies to manage the Commonwealth Heritage values of the place.
- i) Include an implementation plan.
- j) Show how the implementation of policies will be monitored.
- k) Show how the Management Plan will be reviewed.

According to the guidelines, *Management Plans for Places on the Commonwealth Heritage List: a guide for Commonwealth agencies* (November 2006), the process for developing a Management Plan is as follows:

1. Prepare a plan for a place with Commonwealth Heritage values.
2. Seek assistance/input from the relevant Commonwealth department.
3. Seek public comment on the draft plan.
4. Ask the Minister for advice.
5. Publish a notice that a plan has been made.

Appendix B: EPBC Act Approvals

What is a referral?

A referral is an application for the approval of an action that could have a significant impact on any matter of National Environmental Significance (NES), including Commonwealth Heritage values. The owner or manager of the place, or person proposing to take the action, is required to decide whether or not the action proposed has the potential to have a significant impact on Commonwealth Heritage values.

Who can make a referral?

Referrals may be made by or on behalf of a person proposing to take an action, the Commonwealth or a Commonwealth agency, a state or territory government, or agency, provided that the relevant government or agency has administrative responsibilities relating to the action.

When do I need to make a referral?

A referral must be made for actions that are likely to have a significant impact on the following matters protected by Part 3 of the EPBC Act:

- World Heritage properties (sections 12 and 15A)
- National Heritage places (sections 15B and 15C)
- Wetlands of international importance (sections 16 and 17B)
- Listed threatened species and communities (sections 18 and 18A)
- Listed migratory species (sections 20 and 20A)
- Protection of the environment from nuclear actions (sections 21 and 22A)
- Commonwealth marine environment (sections 23 and 24A)
- Great Barrier Reef Marine Park (sections 24B and 24C)
- The environment, if the action involves Commonwealth land (sections 26 and 27A), including:
 - actions that are likely to have a significant impact on the environment of Commonwealth land (even if taken outside Commonwealth land);
 - actions taken on Commonwealth land that may have a significant impact on the environment generally;
- The environment, if the action is taken by the Commonwealth (section 28)
- Commonwealth Heritage places outside the Australian jurisdiction (sections 27B and 27C)

A referral may still be made if a proposed action is not considered to have a significant impact, or where this is not known with certainty. Referring in this way will provide a greater level of certainty that Commonwealth assessment requirements have been met.

To help decide on whether or not a proposed action requires approval (and therefore, if a referral should be made), the following guidance is available from:

- Policy Statement titled Significant Impact Guidelines 1.1 – Matters of National Environmental Significance. Additional sectoral guidelines are also available.
- Policy Statement titled Significant Impact Guidelines 1.2 - Actions on, or impacting upon, Commonwealth land, and actions by Commonwealth agencies.

Can I refer part of a larger action?

In certain circumstances, the Minister may not accept a referral for an action that is a component of a larger action and may request the person proposing to take the action to refer the larger action for consideration under the EPBC Act (Section 74A, EPBC Act). Before making a referral for a staged or component referral, read 'Fact Sheet 6 Staged Developments/Split Referrals' and contact the Referral Business Entry Point (1800 803 772).

Do I need a permit?

Some activities may also require a permit under other sections of the EPBC Act or another law of the Commonwealth. Information is available on the Department's web site.

What information do I need to provide?

Completing all parts of the EPBC Online Referral Form through the Online Services Portal (available on the Department of Agriculture, Water and the Environment website) will ensure that the required information is submitted, and will also assist the Department to process a referral efficiently.

Attachments/supporting information

The referral form should contain sufficient information to provide an adequate basis for a decision on the likely impacts of the proposed action. Supporting documentation, such as heritage impacts statements which relate directly to the proposal, and individual post office property citations/datasheets, should also be included as attachments.

Coloured maps, figures or photographs to help explain the project and its location should also be submitted with a referral. Aerial photographs, in particular, can provide a useful perspective and context. Figures should be good quality as they may be scanned or viewed electronically. Maps should be of a scale that clearly shows the location of the proposed action and any environmental aspects of interest.

Note: the Minister may decide not to publish information that the Minister is satisfied is commercial-in-confidence.

How do I submit a referral?

Referrals may be submitted electronically using the Online Services Portal using the EPBC Online Referral Form. The portal allows for the completion of the form and with supporting material uploaded to the portal including shapefiles, .kml files and the ability to draw the proposal area on a map. You must register and log in to Online Services to submit an EPBC Act Referral. Assistance with the Online Services is available via email: epbc.referrals@environment.gov.au or by telephone on (02) 6274 2496.

What happens next?

Following receipt of a valid referral (containing all required information), the Minister has 20 business days to decide if the proposed action triggers the matters protected by the EPBC Act and requires further assessment and approval. As part of the 20 business days, the EPBC Act provides a public comment period of 10 business days (with no extensions). This provides an opportunity for relevant Australian State and Territory government ministers and members of the public to comment on the proposed action. At the end of the 20 business days, the Department will write to you to advise you of the outcome of your referral and whether or not formal assessment and approval under the EPBC Act is required. The decision will also be available on the public notices page. During the decisions process (including comments from the public) the Minister can make one of three decisions:

The proposed action is NOT LIKELY to have a significant impact and does NOT NEED approval

No further consideration is required under the environmental assessment provisions of the EPBC Act and the action can proceed (subject to any other Commonwealth, state or local government requirements).

The proposed action is NOT LIKELY to have a significant impact IF undertaken in a particular manner

The action can proceed if undertaken in a particular manner (subject to any other Commonwealth, state or local government requirements). The particular manner in which you must carry out the action will be identified as part of the final decision. You must report your compliance with the particular manner to the Department.

The proposed action is LIKELY to have a significant impact and does NEED approval

If the action is likely to have a significant impact a decision will be made that it is a controlled action. The particular matters upon which the action may have a significant impact (such as World Heritage values or threatened species) are known as the controlling provisions.

The controlled action is subject to a public assessment process before a final decision can be made about whether to approve it. The assessment approach will usually be decided at the same time as the controlled action decision. (Further information about the levels of assessment and basis for deciding the approach are available on the Department's web site.)

The proposed action would have UNACCEPTABLE impacts and CANNOT proceed

The Minister may decide, on the basis of the information in the referral, that a referred action would have clearly unacceptable impacts on a protected matter and cannot proceed.

Compliance audits

If a decision is made to approve a project, the Department may audit it at any time to ensure that it is completed in accordance with the approval decision or the information provided in the referral. If the project changes, such that the likelihood of significant impacts could vary, you should write to the Department to advise of the changes.

For more information

- call the Department of the Agriculture, Water and the Environment on 1800 803 772 or
- visit the web site <https://www.environment.gov.au/epbc/about>

All the information you need to make a referral, including documents referenced in this form, can be accessed from the above web site.

Appendix C: Heritage Procedures Manual 2020, Section 2.5 – EPBC ACT Referrals and Approvals¹

2.5 EPBC ACT Referrals and Approvals

The steps below address properties owned by Australia Post which are include in the National Heritage List and the Commonwealth Heritage List. Properties leased by Australia Post are addressed at Section **Error! Reference source not found.** **Error! Reference source not found.**

2.5.1 Procedures under the EPBC Act

The EPBC Act and its Regulations are amended on a regular basis and notification of changes to the legislation is available online at the Department of Agriculture, Water and the Environment's website: <https://www.environment.gov.au/>. It is important that all Australia Post users of the Manual refer to the most current form of the legislation.

The EPBC Act applies to all Australia Post properties included in the National Heritage List or Commonwealth Heritage List; the Act also applies to places with identified Commonwealth Heritage Values which have not yet been added to the List.

There are essentially three stages to obtaining an approval for works under the EPBC Act, however, not all proposed works will involve all three stages:

- Advice stage
- Referral stage
- Assessment / decision stage

Once it has been determined that a property is subject to the heritage provisions of the EPBC Act, then the necessary steps need to be undertaken in order to determine which stages of the EPBC Act assessment process need to be undertaken before proposed works can proceed. In some cases, advice and input may be required from a qualified heritage practitioner.

The EPBC Act approvals processes are set out in Section 0 to 0 and are the same for all states and territories. The approvals process will involve statutory lead times (normally given in business days) for various stages of the assessment, which relate to, for instance: required periods to notify the Minister; for public notification; to determine impacts, etc. Once the scope and complexity of the proposed works are known, it is strongly recommended that the anticipated time frame for the obtaining approval is taken into consideration in the building/construction program.

2.5.2 How does the EPBC Act relate to other statutory heritage approvals?

The EPBC Act does not replace the need to obtain permits and works approvals from local municipal authorities or state/territory heritage authorities, unless a bilateral agreement is in place. Australia Post must obtain all necessary permits and approvals from the relevant local, state, and Commonwealth government authorities before an action is taken.

The Australian Government has entered into assessment bilateral agreements with all state and territory governments to accredit (natural) environmental assessment processes that meet set standards. Under these agreements, the Minister for Agriculture, Water and the Environment may rely on specified environmental impact assessment processes of states and territories in assessing actions under the EPBC Act. In this situation it may be possible to undertake a single assessment process, thereby avoiding duplication, although this has to be confirmed. The assessment manager at the DAWE can provide advice on this.

Further information is available at: <https://www.environment.gov.au/epbc/one-stop-shop>.

Generally, however, to reduce delays and help coordinate assessment, consideration should be given to making an EPBC Act referral at the same time as commencing the state or territory approvals processes. The DAWE should then be able to work with state, territory and local authorities to ensure that any EPBC Act conditions of approval are compatible with other conditions and avoid inconsistencies.

¹ *Heritage Procedures Manual 2020*, Strategic Framework for managing Australia Post heritage properties, Effective 8 October 2020, prepared by Lovell Chen pp.10 – 14.

2.5.3 Advice stage

The key driver for seeking a referral under the EPBC Act is to determine whether the proposed works are likely to have a significant impact on the National or Commonwealth Heritage Values of the place (i.e. the works are defined as a 'controlled action'). The Department has prepared guidelines to assist in determining if the action is likely to have a significant impact. These guidelines are available from the Department website (<https://www.environment.gov.au/epbc/policy-statements>). In general terms, maintenance of a heritage place is not considered to be a controlled action.

There are several ways of confirming if a referral is required.

- a. Decision by Australia Post: Where the works are clearly associated with the maintenance of a property, or in specific cases fall within the ambit of works endorsed by a management plan, then Australia Post can decide that a referral is not required.

OR

- b. Advice from a heritage practitioner: A qualified heritage practitioner can provide advice on whether a proposed action constitutes a controlled action, and Australia Post can accept the advice as a basis on which to proceed. Where the works are not considered a controlled action, then the works can proceed without seeking advice from, or referral to, the Heritage Division of the Department. If the advice (from the heritage practitioner) is that the proposal may constitute controlled action under the EPBC Act, then a referral is required (see below).

OR

- c. Advice from the Minister: Australia Post can seek the advice of the Minister (effectively from the Heritage Division of the Commonwealth Department of Agriculture, Water and the Environment), on the need to make a referral. This can be done by means of a letter to the Department, outlining what is proposed and seeking a response as to whether a referral is required. This stage largely comprises correspondence and communication between Australia Post and DAWE. The Minister is required to provide written advice to the agency within 30 business days; he or she may also ask for additional information at this stage, in order to provide the advice. The further information or clarification may involve architectural drawings in relation to the proposal, or a report from a qualified heritage practitioner which comments on the heritage impacts of the proposal. The advice may be that there is no 'significant impact' associated with the proposed works, and hence no further action is required under the approvals process. Alternatively, the advice may be that a referral is required, as a 'significant impact' is anticipated.

Australia Post can also opt to pass over this preliminary or 'advice' stage, including where it is apparent that the proposed action will have a significant impact (and be a controlled action), and go straight to the 'referrals' stage.

2.5.4 Referral stage

Referrals are processed by the Referral Section of the DAWE and a detailed formal referral form must be submitted.

Electronic proforma forms and associated guidelines are available at <http://www.environment.gov.au/protection/environment-assessments/assessment-and-approval-process/refer-proposed-action>.

To complete the referral, information about the proposal will be required, including the details of exactly what is proposed, where and when, and a description of the likely heritage impacts. It may be appropriate to seek the assistance of a heritage practitioner in completing the referral documentation.

It is important to include all relevant information in the referral documentation to assist the DAWE in deciding whether or not significant impacts are likely and EPBC Act approval is required. This should include information about measures taken to reduce impacts. Depending on the nature of the proposed works, required documentation may also include architectural drawings (existing conditions, plans, elevations, schedule of materials, etc) and a more detailed heritage impacts assessment or analysis that identifies the relevant Commonwealth Heritage Values, analyses the impacts of the proposed works on the values, and describes how the values will be managed, and the impacts minimised, through the proposed works. The latter would typically be prepared by a qualified heritage practitioner. In some cases it may be decided that approval is not required because an action is being taken in a way that avoids heritage impacts.

Once a referral is made, the Minister is required to make a decision within **20 business days**, as to whether the action (i.e. proposed works) requires approval under the Act as a controlled action. During this time, information about the proposal will be posted on the Department's web site and there is usually a **10 business day public comment period**. This ensures that the 'referrals' stage is transparent and subject to public scrutiny.

If it is determined significant impacts are not likely, then EPBC Act approval is not required and the proposal may proceed in the form that it was referred, subject to any other approvals such as those required by state or territory governments or local municipal authorities.

If the Minister decides that an action is a controlled action and requires approval, then a detailed 'environmental assessment' of the action must be carried out. It is understood, however, that most proposals are dealt with during the referral stage, and few are referred on to the more detailed 'approvals' stage. Additional information may be requested from the proponent, and in this case a 'stop-the-clock' provision may be in place until such time as the information is provided.

A summary of the EPBC Act environment referral process is provided in Figure 1.

2.5.5 Approval stage

This is the final stage of the EPBC Act process with regard to heritage places, and is generally only reached for complex proposals where significant impacts are considered likely, involve a large number of issues, and have attracted wide public interest. In these cases more detailed assessments are generally required. A decision on whether to approve an action is made within **40 business days**, and conditions may be placed on approvals. For example, a condition may be imposed that requires changes or additional measures to avoid unacceptable impacts on the heritage place. Notices about the level of assessment, opportunities for public comment and the final approval are posted on the Department's web site throughout the process.

An assessment manager from the Department will contact Australia Post in these cases, to explain the steps and procedures involved in the approvals stage.

A summary of the EPBC Act environment assessment process is provided in Figure 2.

2.5.6 Public access to assessment documents

Under the EPBC Act, proponents are required to publish certain assessment documents, such as public environment reports or environmental impact statements, for public information and comment. To ensure that these documents are accessible to the community most affected by proposals, the Act requires that copies of the documents be lodged at a relevant local authority or regional library, as well as being available from the proponent. Proponents will therefore need to contact local authorities to ask for the material to be displayed in libraries or offices.

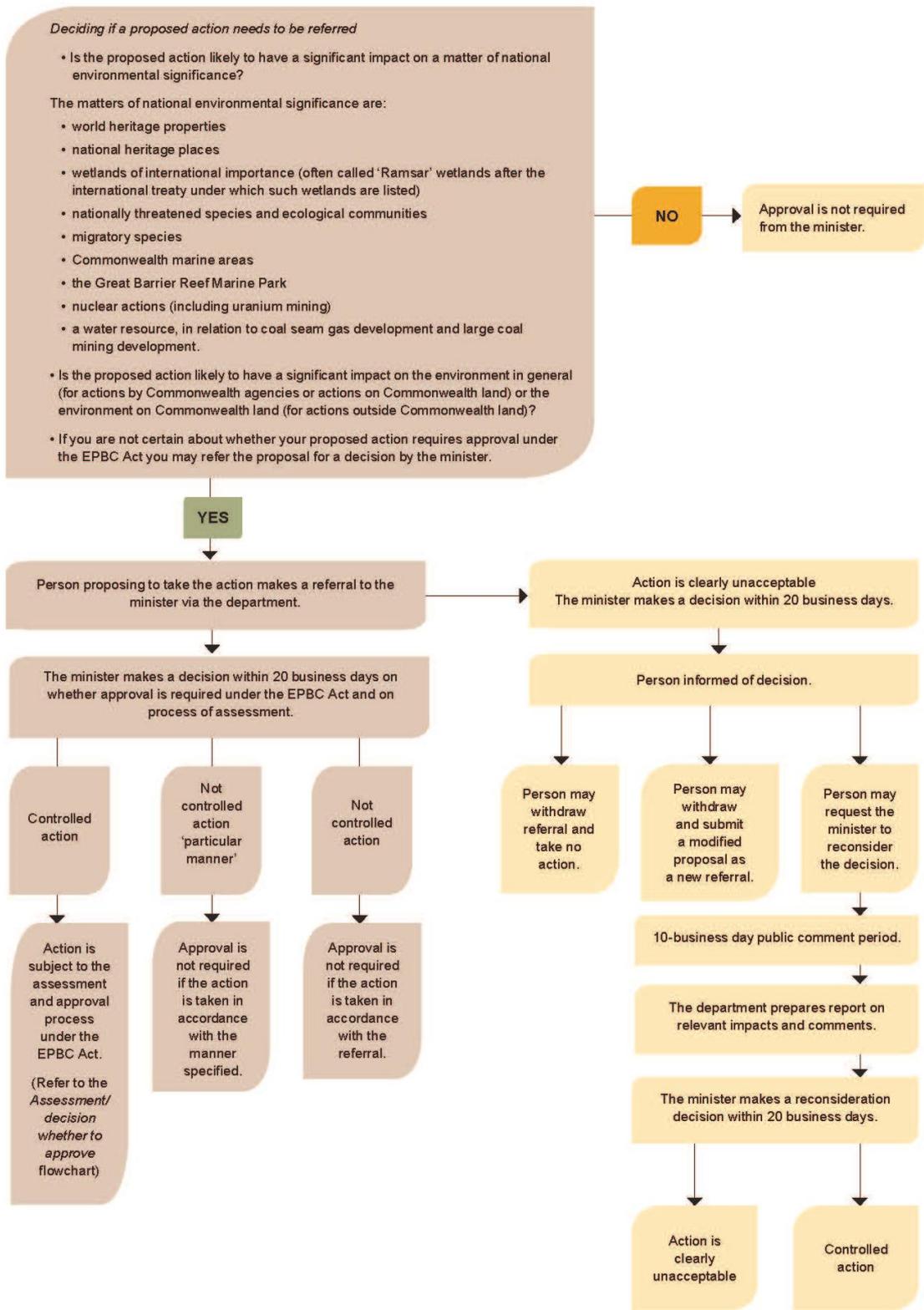


Figure 1 EPBC Act environment assessment process—referral
 Source: EPBC Act – Environment Assessment Process, p 3, Accessed on 02.10.2020, available at: https://www.environment.gov.au/system/files/resources/d60cdd6a-8122-473a-bbd0-d483662cef3e/files/assessment-process_1.pdf

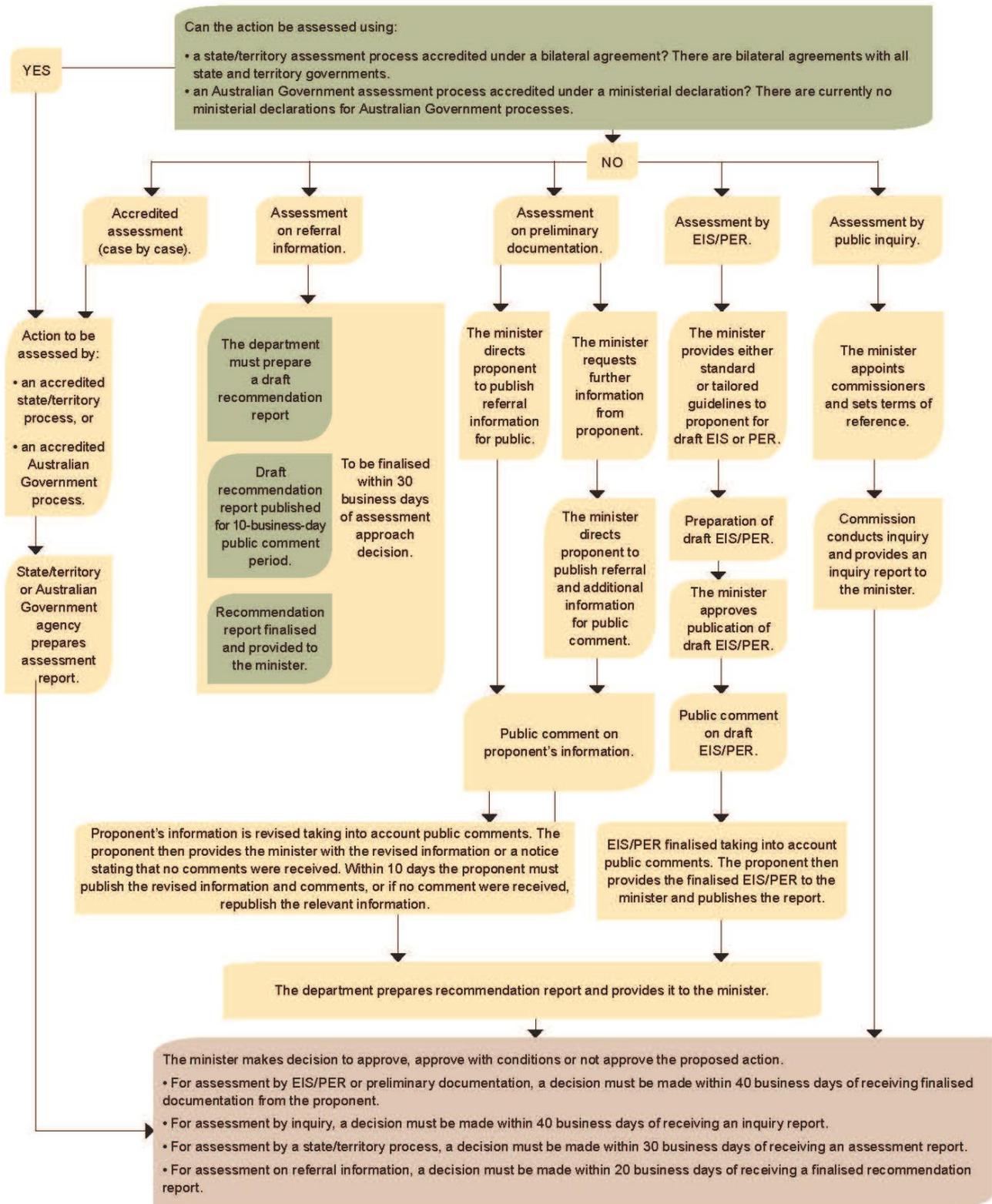


Figure 2 EPBC Act environment assessment process—assessment/decision whether to approve
 Source: EPBC Act – Environment Assessment Process, p 5, Accessed on 02.10.2020, available at:
https://www.environment.gov.au/system/files/resources/d60cdd6a-8122-473a-bbd0-d483662cef3e/files/assessment-process_1.pdf