

# EPBC Act referral



Australian Government

Department of Agriculture, Water and the Environment

Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Title of proposal</b>	<b>2021/8997 - Remediation and Sale of Contaminated Former Australian Red Cross Hall in Greenslopes</b>
<b>Section 1</b>	
<b>Summary of your proposed action</b>	
<b>1.1 Project industry type</b>	Commonwealth
<b>1.2 Provide a detailed description of the proposed action, including all proposed activities</b>	
<p>The action is two part:</p> <ol style="list-style-type: none"><li>1) Remediation -- remove all hazardous materials, demolish buildings and remove contaminated soil from the site; and</li><li>2) Sale -- sell the site to the Brisbane City Council for the purpose of public parkland and other community uses.</li></ol> <p><b>Remediation</b></p> <p>The buildings on the site were constructed with significant amounts of hazardous material. Asbestos was used in the roofing, ceilings, internal walls, wall battens, some external walls, flooring, wet areas and other seals. Lead based paint has also been used. The soil is contaminated with organochlorine pesticides and zinc, as well as ACM from the buildings as they have degraded over time.</p> <p>Remediation will begin with supplementary soil sampling enabled by concrete coring and minor destructive works to delineate the extent of hazardous materials and contamination in areas that could not be sampled without minor destructive testing. Remediation will involve removal of exposed ACM on the ground surface, a careful deconstruction of the buildings to safely remove the hazardous materials, then general demolition of the remaining structures (mostly the framing and foundations). Approximately 600 m3 of soil will be removed to contaminated landfill. Testing will determine whether the site is free from contaminants and hazardous materials and further remediation conducted with a view to removing the site from the Environmental Land Register.</p> <p>During the remediation, several architectural elements will be preserved and an archaeological protocol observed as per the recommendations of the Attachment H - Heritage Impact Assessment, s5.2, pp. 100-102.</p> <p><b>Sale</b></p> <p>The Brisbane City Council has agreed to buy the site from DVA at a concessional price with a view to creating public parkland under an "urban commons" designation. They have agreed to provide one of the lots to Queensland Legacy to create a state headquarters, should Legacy wish to take up this option, further preserving the site's connection with Australia's returned service men and women. The sale contract will include clauses to ensure that the BCC uses the site for the intended purpose given the concessional sale price of \$1m.</p> <p>DVA has engaged a heritage architect (Catalyst Architects) to prepare a Heritage Interpretive Strategy that will be provided to the Brisbane City Council to assist them in preserving the Heritage elements of the site. Likewise the Heritage Impact Assessment has identified a number of built architectural elements that will be preserved during the demolition and their ongoing integration into the final design will also be stipulated in the sales contract.</p>	
<b>1.3 What is the extent and location of your proposed action?</b>	
See Appendix B	
<b>1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland)</b>	
<p>The former Australian Red Cross Centre is located on the corner of Newdegate Street &amp; Headfort Street (Lot 123, 124 &amp; 125 of RP46047), Greenslopes, Brisbane. Parish of Bulimba, County of Stanley, now part of Brisbane City Council's LGA. Total land area is 1934m<sup>2</sup>. The Greenslopes Private Hospital is located across the road to the south-west. The site slopes moderately down to the north towards Norman Creek, located ~900m to the north-west. Land uses to the S, N &amp; E of the site are presently suburban residential. There are two buildings, both with frontages to Newdegate Street: a large timber framed recreation hall on the south portion of the land, and a smaller two-storey timber framed accommodation hostel building on the northern portion, with a single-storey wing. The remainder of the site is laid with concrete paving and limited soft landscaping with a brick entry feature gateway of post-war style. Temporary fencing secures the site due to hazardous materials on site</p>	
<b>1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?</b>	
1934 sq.m	



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>1.7 Proposed action location</b>		
Lot - Lots 123, 124 and 125 on RP46047		
<b>1.8 Primary jurisdiction</b>		Queensland
<b>1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?</b>		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>1.10 Is the proposed action subject to local government planning approval?</b>		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<b>1.10.1 Is there a local government area and council contact for the proposal?</b>		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<b>1.10.1.0 Council contact officer details</b>		
1.10.1.1 Name of relevant council contact officer	Annette McGee	
1.10.1.2 E-mail	Annette.Magee@brisbane.qld.gov.au	
1.10.1.3 Telephone Number	07 3403 6554	
<b>1.11 Provide an estimated start and estimated end date for the proposed action</b>		
	Start Date	15/10/2021
	End Date	31/03/2022
<b>1.12 Provide details of the context, planning framework and state and/or local Government requirements</b>		
<p>Queensland Environment Protection Act 1994</p> <p>This legislation governs much of the requirements for handling contaminated soils, hazardous materials, and so forth. A "Suitably Qualified Person" under the Act has been engaged (Coffey Envrionments) as has a Contaminated Land Auditor (Epic Environmental).</p> <p>Brisbane City Council Development Approval for the demolition activity. Whether this is strictly legally required is arguable given the Commonwealth enjoys some immunity to State and Local laws, however, DVA has chosen to engage in this process with the BCC given we have partnered with the Council for the final use of the land. A development consultant has been engaged for this purpose (Place Design Group). see Attachment U - Development Consultant Engagement Proposal.</p>		
<b>1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders</b>		
<p>The BCC (Cr Fiona Cunningham) has consulted with Greenslopes Residents regarding the future use of the site and undertaking to consult on the design and amenities of future parkland planned for the site. see Attachment M - Community Consultation - Cr Fiona Cunningham. DVA has followed this up with a consultation of the entire suburb of Greenslopes in June 2021 and consultation with the business operators on the Hospital Grounds via the Greenslopes Private Hospital Property Manager. Details of this consultation are in Attachment N - Community Consultation Report.</p>		
<b>1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project</b>		
<p>The project area is 3 residential lots in a long established Brisbane city suburb. An environmental impact assessment is not required. However, several contamination testing reports have made reference to the context of the project area in terms of any local environmentally significant areas proximal to the project area.</p> <p>See: Attachment B - Contaminated Land Assessment Phase 1; Attachment C - Contaminated Land Assessment Phase 2; and Attachment D - Delineation Assessment of Organochlorine Soil Impacts.</p>		
<b>1.15 Is this action part of a staged development (or a component of a larger project)?</b>		
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
<b>1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action</b>		
After sale to the Brisbane City Council, they will embark upon a project to build a community park on the site, with an option		



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

to sell part of the site (1 of the 3 residential lots) to Legacy Queensland for the purpose of building a new state headquarters. The Department of Veterans' Affairs will not be involved in this follow on project other than to provide Heritage Material to BCC for incorporation into their design, and to insist on final use covenants in the contract of sale.

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

☐ Yes      ☒ No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 2

### Matters of national environmental significance

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

The proposed action will remove buildings which have an association with the historic value of the former Greenslopes Repatriation Hospital for a portion of their history. The current buildings are unable to be used, and never will be, due to contamination issues and hazardous materials. While the buildings do not meet the CHL threshold for historic heritage value in their own right, they were previously associated with the broader Greenslopes Hospital function and its historic heritage values and therefore have a limited historic heritage value. Attachment H - Heritage Impact Assessment, s4.3, pp87-88 notes "The ARC Centre provided recreation and rehabilitation services to Greenslopes Repatriation Hospital patients and their families for a period of approximately 25 years, from 1946 until the late 1960s (compared with the Greenslopes hospital period of operation in excess of 50-years). After this time, the need for the ARC Centre recreation services declined. The Centre continued to be used in a more diversified community capacity and was no longer exclusively serving the Greenslopes Repatriation Hospital functions...It is concluded that the heritage values for the former Greenslopes ARC Centre under this criterion, are in respect to its association and contribution to the broader Greenslopes Repatriation Hospital site and function.

The former Greenslopes ARC Centre association with important historical events is insufficient to meet the threshold indicators in its own right."

Likewise the buildings have previously been used as a community hall for various groups such as seniors groups and sporting clubs. In this respect the buildings have previously had some value to people and communities as a meeting hall. This has not been ongoing as the buildings have been closed to the public for 8 years, however it should be acknowledged that this was a value present in the past. There is no hope of restoring these buildings to encompass that use again due to the high cost of adaptive re-use. Attachment H - Heritage Impact Assessment, s4.3, pp92-93 notes "a lack of social value / veteran attachment is evidenced in extensive recent media articles in respect to the site. The focus for these articles is entirely centred around local community concerns of public health due to site contamination issues (asbestos)...there is no indication to inform this criterion of any meaningful and strong connection of social heritage value in respect to the Greenslopes ARC Centre by a particular community group. This is not surprising given the site has not served in its original Greenslopes repatriation hospital function for over 50-years and only operated for a 25-year period in a diminishing capacity, before all interest had waned."



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

The buildings may have an associational value for the Australian Red Cross, noting the ARC itself did not sufficiently value the site enough to preserve it. Attachment H - Heritage Impact Assessment, s4.3, pp93-94 notes

"The Greenslopes ARC Centre has a direct association with the work of the Australian Red Cross at the Greenslopes Repatriation Hospital. The construction of the Recreation Hall and Accommodation Hostel buildings using funds provided entirely through the volunteer fundraising efforts of the Red Cross, is a truly remarkable philanthropic accomplishment – albeit this achievement was replicated at an even more profound national level. Therefore, this remarkable contribution by the Red Cross of a Recreation Hall and Accommodation Hostel is important but is by no means rare or unique to this site."

However it goes on to note

"The ARC Centre buildings were supplementary to the much wider support role that Australian Red Cross performed at this site. There certainly exists far stronger and more important connections at other buildings throughout Australia in regard to a recognised association with the Red Cross.... The Greenslopes ARC Centre does not sufficiently embody or define the main work of the Red Cross, which was eminently larger and broader on every conceivable scale (specific site, local, state, national context)...The Greenslopes ARC Centre does however provide a relatively interesting insight into the profound nature of Australian volunteerism during and immediately following the time of a nation in war crisis."

"We conclude that the whilst the Greenslopes ARC Centre does hold associational heritage values in connection with the work of the Australian Red Cross following WWII, these are truly insufficient to satisfy the CHL threshold for historic heritage value under this criterion. The Greenslopes ARC Centre associational heritage values are most strongly connected to its role with the former Greenslopes Repatriation Hospital."

While representing limited heritage value, the demolition and removal of the buildings will have a significant impact on what value exists, mitigated by the extensive actions to preserve what can reasonably be preserved.

**2.7.3 Do you consider this impact to be significant?**

☒ Yes ☐ No

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

☐ Yes ☒ No

**2.9 Is the proposed action likely to have any direct or indirect impact on a water resource from coal seam gas or large coal mining development?**

☐ Yes ☒ No

**2.10 Is the proposed action a nuclear action?**

☐ Yes ☒ No

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

☒ Yes ☐ No

**2.11.1 Describe the nature and extent of the likely impact on the whole of the environment**

The proposed action to remediate the site will also produce a positive effect on the environment in terms of removing hazardous materials and contamination. The buildings are degrading over time and depositing hazardous materials, in particular asbestos and lead based paint, on the ground of the site. Attachment A - Hazardous Materials Register 2013, Attachment E - Asbestos Audit & Management Plan 2015, and Attachment F - Asbestos Audit & Management Plan 2019 show the progression of the degradation and its increasing propensity for transferring hazardous material into the environment. Attachment B - Contaminated Land Assessment Phase 1, Attachment C - Contaminated Land Assessment Phase 2, and Attachment D - Delineation Assessment of Organochlorine Soil Impacts show the extent of soil contamination, and in particular demonstrate how remediation of the site will remove organochlorine pesticides from the site.

**2.11.2 Do you consider this impact to be significant?**

☒ Yes ☐ No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

**2.12 Is the proposed action to be undertaken in a Commonwealth Heritage place overseas?**

☐ Yes ☒ No

**2.13 Is the proposed action likely to have any direct or indirect impact on any part of the environment in the Commonwealth marine area?**

☐ Yes ☒ No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 3

### Description of the project area

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

These residential blocks contain some soft landscaping but otherwise contain no fauna or flora of note. Attachment B -- Phase 1 Contaminated Land Assessment (S2.6, p.5) noted regional ecosystems.

Approximately 300m to the south east of the site:

- Vegetation Management Act essential regrowth habitat
- high value regrowth vegetation containing endangered regional ecosystems
- high value regrowth vegetation containing of concern regional ecosystems
- high value regrowth vegetation that is a least concern regional ecosystems

Approximately 500m west of the site:

- Vegetation Management Act essential regrowth habitat
- high value regrowth vegetation containing endangered regional ecosystems
- high value regrowth vegetation that is a least concern regional ecosystems

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

The Groundwater Resources of Queensland Map (1:2,500,000 Hydrogeological series 1987) indicated the regional groundwater underlying the site is held within sedimentary strata (sandstone, shale, and conglomerate). Attachment B - Coffey Phase 1 Contaminated Land Assessment (sections 2.4, 2.5, and Appendix E) show a bore was registered 920m to the east, drilled to 65.5m and then backfilled due to lack of water and excess salinity.

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

Soil and vegetation is typical of the suburb within which the project area exists. Garden soil with soft landscaping consistent with a Brisbane suburban block. However, the soil is contaminated with Asbestos Containing Materials, organochlorine pesticides, and zinc.

When soil contamination testing was undertaken the soil encountered down to .30mbgs was silty clay with some gravel. From 0.3 - 0.5 mbgs the soil was "clay with some silt and sand and some moisture". see Attachment D - Delineation Assessment of Organochlorine Soil Impacts, s.5.1, p.8 v

The City of Brisbane (1:31,680) Economic Geology Sheet 3 (1965) indicates the site is underlain by Greywacke, siltstone, shale, chert, jasper, and basic volcanics. The economic geology map also indicates an abandoned quartzite mine was located approximately 700m to the west of the project area. see Attachment B - Contaminated Land Assessment s2.3, p.4

A review of the Queensland Government (2003) (1:100,000) Acid Sulfate Soils Tweed Heads to Redcliffe Map 1 indicated the site lies within "land not assessed for ASS". As the site is located at approximately 25mAHD the potential for acid sulphate soils at the site was considered low – see Attachment B – Contaminated Land Assessment s.2.8 p.5.

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

There are no outstanding natural features or unique values relevant to the project area.

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

There is no native vegetation relevant to the project area - it is a suburban residential area.

However, Attachment B -- Phase 1 Contaminated Land Assessment (S2.6, p.5) noted regional ecosystems several hundred metres from the project area:

Approximately 300m to the south east of the site:

- Vegetation Management Act essential regrowth habitat
- high value regrowth vegetation containing endangered regional ecosystems
- high value regrowth vegetation containing of concern regional ecosystems
- high value regrowth vegetation that is a least concern regional ecosystems

Approximately 500m west of the site:

- Vegetation Management Act essential regrowth habitat
- high value regrowth vegetation containing endangered regional ecosystems
- high value regrowth vegetation that is a least concern regional ecosystems



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

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

The site is at approximately 25m AHD and slopes moderately down towards the north towards Norman Creek which is located approximately 900m north west of the site. Surface run-off from the site and surrounding properties is directed into in ground storm-water systems. A Brisbane City Council underground stormwater drain is located on the property immediately to the east of the site and a stormwater connection pit is located in the north east corner of the site. See Attachment B – Contaminated Land Assessment Phase 1, s2.2, p.4. Site gradient can be visualised in Attachment J - Site Survey Drawings, p.4, East Elevation and West Elevation plans.

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

The current condition of the environment relevant to the project area is extremely poor. The buildings contain significant amounts of hazardous materials including asbestos and lead based paint.

The soil is contaminated with organochlorine pesticides and zinc. Attachment C - Contaminated Land Assessment Phase 2 (p.8) states "The concentrations of aldrin and dieldrin within sample location HA10 are an order of magnitude greater than the health based investigation levels for commercial and industrial land uses and two orders of magnitude greater than the health based investigation levels for standard residential use. The detected concentrations of organochlorine pesticides would restrict the use of the site without the implementation of appropriate mitigation measures or completion of remediation works...the concentrations detected do represent a potential risk to the environment"

There is no indication of erosion. The soft landscaping may have some intrusion of weeds common in residential areas, however this is not significant. There is no evidence of feral animal activity.

Asbestos continues to be washed from the roof onto the surface of the soil (See Attachment F - Asbestos Audit and Management Plan 2019), however, asbestos is not airborne (see Attachment O - Airborne Asbestos Monitoring Sept 2020).

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

The project area does contain any Commonwealth Heritage places. Attachment H - Heritage Impact Assessment, s.5.3, p. 103 states "The Assessment of Significance in this HIA has found that the former Greenslopes ARC Centre does not meet the CHL threshold for historic heritage value in its own right, for any of the CHL criterion."

However, the project area is listed on:

1) The Queensland Government's Queensland WWII Historic Places register with the overview "These two timber buildings were built in early 1945 as a wartime Red Cross recreation hall and an accommodation hostel. Used to provide entertainment for recuperating service personnel from the adjacent Greenslopes Military Hospital, the hall was a venue for films, dances, concerts and billiards and library services. Unpaid volunteers staffed them. After the war, the Red Cross continued to operate the hall and hostel for the benefit of ex-military patients who were the responsibility of the Commonwealth's Department of Veteran (sic) Affairs." See Attachment H - Heritage Impact Assessment, Appendix C - Existing Heritage Citations, p157-168.

2) Brisbane City Council Heritage Register  
Summary

This large timber hall and smaller neighbouring building were constructed circa 1945 as Red Cross recreation centres from funds raised by the Australian Red Cross Café in Brisbane. They demonstrate the commitment of the Brisbane community and the Australian Red Cross organisation to the Second World War effort and to providing facilities for Australian service personnel. The buildings have been in continuous use by the Red Cross for more than 65 years and have provided a base from which to provide important welfare services to the local community.

Significance

a) It is important in demonstrating the evolution or pattern of the City's or local area's history as it provides evidence of the work of the Red Cross Society in Brisbane, and particularly Greenslopes, during World War II and in the subsequent decades.

b) It demonstrates rare, uncommon or endangered aspects of the City's or local area's cultural heritage as the buildings are rare surviving examples of purpose built World War II recreational buildings in Brisbane.

d) It is important in demonstrating the principal characteristics of a particular class or classes of cultural places as the main Red Cross hall is significant as an example of a purpose built, World War II, recreational building which has retained its stage and projection room.

g) It has a strong or special association with the life or work of a particular community or cultural group for social, cultural or spiritual reasons for its special association for over half a century with members of the local community, particularly the past and present patients of the Greenslopes Hospital, the veteran community of Brisbane and Red Cross workers and volunteers.

h) It has a special association with the life or work of a particular person, group or organisation of importance in the City's





Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

or local area's history as the site has had a long association with the Australian Red Cross Society, an important charitable organisation in Brisbane's history.

See Attachment H - Heritage Impact Assessment, Appendix C - Existing Heritage Citations, p148-156.

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

There are no indigenous heritage values relevant to the project area as the project area is located in an extant suburban setting. However, the demolition and soil remediation works will be conducted with the benefit of an archaeological protocol (see Attachment H - Heritage Impact Assessment, s5.2, p.102) which will be enacted in the event of discovery of any evidence of indigenous land occupation.

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

Freehold (Estate in fee simple)

Certificate of Title (Title Reference: 12255073 Certificate No:3)

See Attachment G - Certificate of Title

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

The project area is not currently used. It was abandoned by the Australian Red Cross in 2013 due to health and safety concerns. The site has remained closed with temporary security fencing and the structures continue to degrade. It is not safe for use, nor is it feasible to obtain a certificate of occupancy and return the site to use.

The proposed final use of the project area once remediation is complete is for the Brisbane City Council to create a public park for the local community and sell part of the land to Queensland Legacy for the purpose of constructing a new headquarters for Legacy to continue to support veterans and war widows.

**Public Park**

The public park will retain some of the architectural elements of the current site that can be preserved and which offer some heritage value such as the brick entranceway and some elements of brick facade as described in Attachment H - Heritage Impact Assessment. Councillor Fiona Cunningham has undertaken to consult the local community on the park design and amenities (Attachment M - BCC Community Consultation 1). By ensuring that the site is returned to community use it

**Legacy House**

The Brisbane City Council has undertaken to sell one of the three lots (51 Headfort St) to Legacy for the purpose of constructing a new state headquarters for Legacy. This will enable the site to continue its historic link to providing services to returned service men and women and their widow(er)s through the ongoing work of Legacy Queensland.



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 4

### Measures to avoid or reduce impacts

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

1) Engagement of an SQP - DVA has engaged an Environmental Consultant (Jeremy Wicks of Coffey Environments) as a Suitably Qualified Professional to ensure that the remediation works are conducted in a manner consistent with all environmental and safety laws. see Attachment P - SQP Engagement.

2) Engaged a Contaminated Site Auditor - DVA has engaged a Contaminated Site Auditor (Louise Cartwright at Epic Environmental) to oversee the remediation aspect of the project. see Attachment Q - Contaminated Site Auditor DES Notification.

3) Engagement of a heritage architect and implementation of the recommendations of the Heritage Impact Assessment to minimise any heritage impact. see Attachment H - Heritage Impact Assessment, s5.2, pp.100-102

(a) Heritage Photographic Record - COMPLETED. DVA commissioned and has received a heritage photographic record including terrestrial and aerial drone photography.

Further, DVA commissioned a surveyor to to prepare 3d laser scanned plans of the existing structures. See Attachment I1 - Photographic Record report; Attachment I2 -

Photographic Record Reference Plans; and Attachment J - Survey Drawings.

(b) Recover Missing Elements of the buildings - heritage architect engaged to conduct search for missing elements. See Attachment K - Heritage Interpretive Strategy Engagement.

(c) Salvage Select Build Elements - demolition will be conducted in a manner that preserves the elements identified in the Heritage Impact Assessment recommendations - see Attachment S - Email - Retained Architectural Elements.

(d) Heritage Interpretive Strategy - Catalyst Architects engaged to prepare HIS (see Attachment K - Heritage Interpretive Strategy Engagement)

(e) Establish a compatible future site use - DVA has struck an agreement with the Brisbane City Council to fully remediate the site and then sell it to BCC at a concessional rate for the purpose of the construction of a community park and other community uses (such as dedicating part of the site for use by Legacy Queensland as its new state HQ). See Attachment R - Joint Media Release and Attachment M - Community Consultation - Cr Fiona Cunningham. The Minister for Veterans' Affairs made a joint announcement with the Lord Mayor of Brisbane, Adrian Schrinner stating that the site will be returned to community use and parkland (see Attachment R - Joint Media Release).

(f) Heritage Protection - DVA is engaging McInnes Wilson to conduct negotiations with the BCC and prepare the contract of sale incorporating covenants that will restrict final use, and insisting on the incorporation of heritage elements consistent with a heritage interpretive strategy that will be prepared by the heritage architect.

(g) Archaeological Finds Protocol - this has been incorporated into the demolition company's environmental management plan. see s9, pp 10-11, Attachment T - Demolition Contractor - Environmental Management Plan).

During the demolition, active air monitoring will be conducted to ensure that measures to manage dust and in particular the risk of airborne asbestos escaping the site are effective.

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

There are two principal objectives of the proposed action:

##### 1) Environmental Clean-up

By removing the buildings including the extensive hazardous material, DVA will eliminate the risk that hazardous materials will escape the site. Likewise the removal of the contaminated soil to encapsulated landfill will remove contamination from the site, reducing the risk of contaminants such as organochlorone pesticides or heavy metals escaping the site.

##### 2) Return the Site to Community Use

By selling the site to the BCC with contractually defined usage conditions, DVA will ensure that the site is returned to the community for use as a community asset as a community park with the option to sell 1 of the 3 lots to legacy for their new state headquarters.



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 5

### Conclusion on the likelihood of significant impacts

#### 5.1 You indicated the below ticked items to be of significant impact and therefore you consider the action to be a controlled action

- ☐ World Heritage properties
- ☐ National Heritage places
- ☐ Wetlands of international importance (declared Ramsar wetlands)
- ☐ Listed threatened species or any threatened ecological community
- ☐ Listed migratory species
- ☐ Marine environment outside Commonwealth marine areas
- ☒ Protection of the environment from actions involving Commonwealth land
- ☐ Great Barrier Reef Marine Park
- ☐ A water resource, in relation to coal seam gas development and large coal mining development
- ☐ Protection of the environment from nuclear actions
- ☒ Protection of the environment from Commonwealth actions
- ☐ Commonwealth Heritage places overseas
- ☐ Commonwealth marine areas

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

The project area "does not meet the CHL threshold for historic heritage value in its own right, for any of the CHL criterion" (Attachment H - Heritage Impact Assessment, s5.3, p103) Despite this assessment DVA has adopted a cautious heritage approach and has implemented (or is in the process of implementing) all of the recommendations of the HIA. A heritage photographic record has been completed including 3d laser scanning to create plans of extant structures (Attachments I1, I2, and J). A Heritage Interpretive Strategy has been commissioned, which will be provided to the BCC to incorporate into their park design (see Attachment K - Heritage Interpretive Strategy Engagement).



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 6

### Environmental record of the person proposing to take the action

#### 6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Explain in further detail

There have been no proceedings under Commonwealth, State or Territory law pertaining to the protection of the environment or the conservation and sustainable use of natural resources. DVA has a very long history of preservation (and construction) of war memorials and war graves, both of these activities being part of DVA's core outcomes.

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

nil to report

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

☒ Yes ☐ No

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

Environmental Policy in DVA is written into other policies, not a separate policy document. E.g DVA's procurement policy contains a reference to complying with the EPBC Act 1999.

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

☐ Yes ☒ No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 7

### Information sources

#### Reference source

Work Health and Safety Act 2011 and Regulations (Commonwealth, NSW, ACT, NT & QLD)

#### Reliability

Government Regulation - very reliable

#### Uncertainties

none

#### Reference source

National Environment Protection Measure – Assessment of Site Contamination (2013 revision)      National Environment Protection Council (1999)

#### Reliability

good - industry body

#### Uncertainties

none

#### Reference source

Australian Standard AS2601, The Demolition of Structures, Section 1.6.

#### Reliability

very good

#### Uncertainties

none

#### Reference source

Australian Standard AS1319, Safety signs for the occupational environment

#### Reliability

very good (Australian Standards)

#### Uncertainties

none

#### Reference source

Standards Australia (HB203:2012) Environmental Risk Management – Principles and Processes

#### Reliability

very good - Australian Standard

#### Uncertainties

none

#### Reference source

National Code of Practice How to Safely Remove Asbestos (Safe Work Australia 2011)

#### Reliability

very good - Australian Government



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

**Uncertainties**

none

**Reference source**

National Code of Practice How to Manage and Control Asbestos in the Workplace (Safe Work Australia 2011)

**Reliability**

very good - Australian Government

**Uncertainties**

none

**Reference source**

Health and Safety Laboratory UK - HSG 227 A Comprehensive Guide to Managing Asbestos in Premises 2002

**Reliability**

good - UK Government

**Uncertainties**

none

**Reference source**

Health and Safety Laboratory UK – HSG 264 Asbestos The Survey Guide 2010

**Reliability**

good - UK Government

**Uncertainties**

none

**Reference source**

Health and Safety Laboratory UK - Methods for the Determination of Hazardous Substances (MDHS) 100 Surveying, sampling and assessment of asbestos-containing materials 2001

**Reliability**

good - UK Government

**Uncertainties**

none

**Reference source**

National Institute for Occupational Safety and Health [NIOSH (U.S.A.)], Manual of Analytical Methods,

**Reliability**

good - USA Government

**Uncertainties**

none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

**Reference source**

National Occupational Health and Safety Commission (NOHSC), Approved Criteria for Classifying Hazardous Substances, 1008 – 2002

**Reliability**

very good - Australian Government

**Uncertainties**

none

**Reference source**

National Occupational Health and Safety Commission (NOHSC), Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition, 3003 - 2005

**Reliability**

very good - Australian Government

**Uncertainties**

none

**Reference source**

National Occupational Health and Safety Commission (NOHSC), List of Designated Hazardous Substances, 10005 - 1999

**Reliability**

very good - Australian Government

**Uncertainties**

none

**Reference source**

Occupational Health and Safety Act 1984 and Regulations 1996 (WA)

**Reliability**

very good - Australian State Government

**Uncertainties**

none

**Reference source**

Occupational Health and Safety Act 2004 and Regulations 2003, 2007 (VIC),

**Reliability**

very good - Australian State Government

**Uncertainties**

none

**Reference source**

Occupational Health and Safety and Welfare Act 1986 and Regulations 2010 (SA)

**Reliability**

very good - Australian State Government

**Uncertainties**

none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Reference source</b>
very good - Australian State Government
<b>Reliability</b>
very good - Australian State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Department of Mines (1965) City of Brisbane Economic Geology Sheet 3 1:31,680
<b>Reliability</b>
very good - Australian State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Department of Mapping and Surveying (1980) Topographic Map Mount Gravatt 1:25,000 (9542-44)
<b>Reliability</b>
very good - Australian State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Queensland Government (1987) 1:2,500,000 Groundwater Resources of Queensland Map (Hydrogeological Series 1987)
<b>Reliability</b>
very good - Australian State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Association of Fluorocarbon Consumers and Manufacturers, The Australian Refrigeration and Air
<b>Reliability</b>
industry body
<b>Uncertainties</b>
none

<b>Reference source</b>
Standards Australia (AS4482-2005) Guide to the Investigation and Sampling of Sites with Potentially Contaminated Soil.
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none





Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Reference source</b>
Brisbane City Council – Brisbane City Plan 2014
<b>Reliability</b>
good - local government
<b>Uncertainties</b>
none

<b>Reference source</b>
Queensland Department of Environment and Science (2017) Environmental Protection (Waste ERA Framework) ERA 60 Waste Disposal (update 2019).
<b>Reliability</b>
good - State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Queensland Environmental Management Register (EMR)
<b>Reliability</b>
good - state government
<b>Uncertainties</b>
none

<b>Reference source</b>
'Sample Preservation and Container Guide' for holding times (QS3001). Eurofins
<b>Reliability</b>
good - accredited laboratory
<b>Uncertainties</b>
none

<b>Reference source</b>
Safe Work Australia: How to Manage and Control Asbestos in the Workplace Code of Practice 2011
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Safe Work Australia: How to Safely Remove Asbestos Code of Practice 2011
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Reference source</b>
Queensland Government Department of Employment & Industrial Relations Asbestos Fact Sheets 1-5
<b>Reliability</b>
good - State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Workplace Health and Safety Queensland: Workplace Health and Safety Act (2011)
<b>Reliability</b>
good - State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Workplace Health and Safety Queensland: Workplace Health and Safety Regulation (2011)
<b>Reliability</b>
good - State Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Environment Protection and Biodiversity Conservation Act 1999 (the EPBC Act).
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Google Maps
<b>Reliability</b>
good - trusted source satellite data
<b>Uncertainties</b>
2019 satellite images might be missing very recent built elements

<b>Reference source</b>
Queensland WWII Historical Places Register
<b>Reliability</b>
good - State Government
<b>Uncertainties</b>
none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Reference source</b>
Environment Protection and Biodiversity Conservation Regulations
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none

<b>Reference source</b>
Department of the Environment, Water and the Arts - Significant Impact Guidelines 1.2 (EPBC Act 1999), 2010.
<b>Reliability</b>
very good - Australian Government
<b>Uncertainties</b>
none

<b>Reference source</b>
The Australian Red Cross Quarterly (1947, 1957, 1959 and 1960) and 'Notes on activities' (1946).
<b>Reliability</b>
moderate
<b>Uncertainties</b>
none

<b>Reference source</b>
Red Cross Annual Reports and Statement of Accounts - Queensland Division (1945-1974).
<b>Reliability</b>
good - audited financial documents
<b>Uncertainties</b>
none

<b>Reference source</b>
Buildings Register 1945, Brisbane City Archives.
<b>Reliability</b>
good - local govt
<b>Uncertainties</b>
none

<b>Reference source</b>
Historic aerial maps, Queensland Government, QImagery.
<b>Reliability</b>
very good - State government photographic imagery
<b>Uncertainties</b>
none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Reference source</b>
The Power of Humanity: 100 years of Australian Red Cross 1914-2014, Melanie Oppenheimer (2014).
<b>Reliability</b>
moderate - good
<b>Uncertainties</b>
written history

<b>Reference source</b>
Look what you started Henry! A History of the Australian Red Cross 1914-1991, Leon Stubbings (1992).
<b>Reliability</b>
moderate - good
<b>Uncertainties</b>
written history

<b>Reference source</b>
Healing the Wounds of War: A History of the Greenslopes Hospital 1942-2002, Chris Strakosh and Carolyn Wyt (2002).
<b>Reliability</b>
moderate - good
<b>Uncertainties</b>
written history

<b>Reference source</b>
Repat – A Concise History of Repatriation in Australia, Professor Philip Payton for Department of veterans' Affairs (2018).
<b>Reliability</b>
moderate - good
<b>Uncertainties</b>
written history

<b>Reference source</b>
Brisbane City Council - Brisbane Heritage Places Register
<b>Reliability</b>
good - local govt
<b>Uncertainties</b>
none

<b>Reference source</b>
Red Cross websites: International Federation of the Red Cross (IFRC) and the Australian Red Cross.
<b>Reliability</b>
moderate
<b>Uncertainties</b>
none



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

<b>Section 8</b>
<b>Proposed alternatives</b>
<b>Do you have any feasible alternatives to taking the proposed action?</b> Yes <input checked="" type="checkbox"/> No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Section 9

### Person proposing the action

#### 9.1.1 Is the person proposing the action an organisation or business?

☒ Yes ☐ No

#### Organisation

Organisation name (as registered for ABN/ACN)	DEPARTMENT OF VETERANS' AFFAIRS & THE REPATRIATION COMMISSION AND THE MILITARY REHABILITATION AND COMPENSATION COMMISSION
Business name	
ABN	23964290824
ACN	
Business address	Genge Street, Braddon, 2612, ACT, Australia
Postal address	
Main Phone number	1800838372
Fax	
Primary email address	feedback@dva.gov.au
Secondary email address	

#### 9.1.2 I qualify for exemption from fees under Regulation 5.23(1)(ii) of the EPBC Regulations because I am:

☐ Small business  
☒ Not applicable

#### 9.1.2.2 I would like to apply for a waiver of full or partial fees under Regulation 5.21A of the EPBC Regulations

☒ Yes ☐ No

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

Applicant:  
Dave Binny  
Director Property  
Department of Veterans' Affairs  
GPO Box 9998  
BRISBANE QLD 4001  
02 6289 6320

Applicant's ABN:  
23 964 290 824.

Applicant's ACN:  
nil

Having regard to paragraphs 5.21(1)(a) and (b), the grounds on which the applicant considers that a waiver should be made and the reasons why it should be made.

The grounds on which I am making an application for the waiver of fees are in Subdivision K of the Environment Protection and Biodiversity Conservation Regulations section 5.21(1)(b)(i), that is "it is in the public interest".

Specifically the demand for services by veterans has risen substantially driven by decades of operational deployment to hostile warzones. This has exacerbated to the extent that DVA has been unable to keep up with the demand for services to veterans. Of great concern is the large backlog of veterans' compensation cases (for example, applications by war veterans' for compensation for injuries caused by their war service) and the call on DVA to provide counselling and other Mental Health services to veterans. This has been widely recognised by a number of Government reviews (such as reviews into veterans' suicide) and temporary supplementary funding was agreed in the last budget to partially offset the shortfall and to form a dedicated Royal Commission aimed at improving veterans' services.

Redirecting DVA's departmental funding to Department of Agriculture and Environment in the form of application fees has a direct opportunity cost to veterans' services in that it draws on the same resource pool used to process veterans' disability



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.


compensation claims and provide other services to returned service men and women. This would clearly not be in the public interest.

**9.1.3 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)**

First name	dave
Last name	binny
Job title	Director - Property
Phone	02 6289 6320
Mobile	
Fax	
Email	dave.binny@dva.gov.au
Primary address	22 Genge St, Braddon, 2612, ACT, Australia
Address	

**Declaration: Person proposing the action (To be signed by the person at 9.1.3)**

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

Signature:  Date: 9/7/21

I, Dave Binny, the person proposing the action, consent to the designation of Dave Binny as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  Date: 9/7/21



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Proposed designated proponent

### 9.2.1 Is the proposed designated proponent an organisation or business?

☒ Yes ☐ No

#### Organisation

Organisation name (as registered for ABN/ACN)

DEPARTMENT OF VETERANS' AFFAIRS & THE  
REPATRIATION COMMISSION AND THE MILITARY  
REHABILITATION AND COMPENSATION COMMISSION

Business name

ABN

23964290824

ACN

Business address

22 Genge St, Braddon, 2612, ACT, Australia

Postal address

Main Phone number

1800838372

Fax

Primary email address

feedback@dva.gov.au

Secondary email address

### 9.2.2 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)

First name

dave

Last name

Binny

Job title

Director - Property

Phone

02 6289 6320

Mobile

Fax

Email

dave.binny@dva.gov.au

Primary address

22 Genge St, Braddon, 2612, ACT, Australia

Address

### Declaration: Proposed Designated Proponent

I, Dave Binny, the

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

Signature:  Date: 9/7/21





Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

**Referring party (person preparing the information)****9.3.1 Is the referring party an organisation or a business?**

☒ Yes ☐ No

**Organisation****Organisation name (as registered for ABN/ACN)**DEPARTMENT OF VETERANS' AFFAIRS & THE  
REPATRIATION COMMISSION AND THE MILITARY  
REHABILITATION AND COMPENSATION COMMISSION**Business name****ABN**

23964290824

**ACN****Business address**

Genge Street, Braddon, 2612, ACT, Australia

**Postal address****Main Phone number**

1800838372

**Fax****Primary email address**

feedback@dva.gov.au

**Secondary email address****9.3.2 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)****First name**

Dave

**Last name**

Binny

**Job title**

Director - Property

**Phone**

02 6289 6320

**Mobile****Fax****Email**


dave.binny@dva.gov.au

**Primary address**

22 Genge St, Braddon, 2612, ACT, Australia

**Address****Declaration: Referring party (person preparing the information)**

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

Signature:  Date: 9/7/21



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

## Appendix A

### Attachment

Document Type	File Name
localgov_approval_consent	Attachment L - Commitment from BCC.pdf
localgov_approval_consent	Attachment G - Greenslopes Certificate of Title - 15446154E.pdf
public_consultation_reports	Attachment M - Community Consultation - Cr Fiona Cunninghame BCC.pdf
public_consultation_reports	Attachment N - Community Consultation Report.pdf
supporting_tech_reports	Attachment H - Heritage Impact Assessment.pdf
supporting_tech_reports	Attachment D - Delineation Assessment of Organochlorine Soil Impacts.pdf
supporting_tech_reports	Attachment C - Contaminated Land Assessment Phase 2 - 13364331E.pdf
supporting_tech_reports	Attachment O - Airborne Asbestos Monitoring Sept 2020.pdf
supporting_tech_reports	Attachment A - Hazardous Materials Register 2013.pdf
supporting_tech_reports	Attachment E - Asbestos Audit and Management Plan 2015. pdf
supporting_tech_reports	Attachment F - Asbestos Audit and Management Plan 2019. pdf
flora_fauna_investigation	Attachment B - Contaminated Land Assessment Phase 1 - 13330386E.pdf
impact_reduction_docs	Attachment J - Survey Drawings A4.pdf
impact_reduction_docs	Attachment I1 - Photographic Record Report.pdf
impact_reduction_docs	Attachment I2 - Photographic Record Reference Plans.pdf
impact_reduction_docs	Attachment P - SQP Engagement.pdf
impact_reduction_docs	Attachment Q - Contaminated Site Auditor DES Notification. pdf
impact_reduction_docs	Attachment K - Heritage Interpretive Strategy Engagement. pdf
impact_reduction_docs	Attachment R - Joint Media Release.pdf
impact_reduction_docs	Attachment U - Development Consultant Engagement Proposal.pdf
impact_reduction_docs	Attachment T - Demolition Contractor - Environmental Management Plan.pdf
impact_reduction_docs	Attachment S - Email - Retained Architectural Elements.pdf

## Appendix B

### Coordinates

Area 1
-27.513263928158,153.04853269839
-27.51361718855,153.04845089102
-27.513618377977,153.04845089102
-27.513547012334,153.0480297842
-27.513491109214,153.04798418665
-27.513184236263,153.04804990077
-27.513263928158,153.04853269839