

# CONSULTATION INFORMATION PACK

## Riverlea Park Development

**Amended Friday 8 December 2023**

**(further amended Friday 22 December 2023 to include Attachment 9)**

### Application for authorisations under the *Aboriginal Heritage Act 1988 (SA)*

Note: changes to the previous version of this document (dated 31 October 2023) were flagged in pink. Those changes are still included in this document but are no longer flagged. Substantive changes made to this document since 31 October 2023 are coloured in purple. A summary of key changes is on Page 2. **On 22 December 2023, a Consultation Addendum was included as Attachment 9.**

- Applicant:** Walker Buckland Park Developments Pty Ltd
- Application Type:** Sections 21, 23 and 29(1)(b) of the *Aboriginal Heritage Act 1988 (SA)*
- Overall Application Areas:** Authorisations were originally sought over two separate areas located in Riverlea Park (formerly Buckland Park), approximately 30 km north of Adelaide, South Australia (Original Application Areas (**North**) and (**South**)).
- In late October 2023, the Applicant added three additional areas to its application (Additional Application Areas). All five application areas (together, the Overall Application Areas) are located south of the Gawler River (Kadlitparri) and west of Port Wakefield Road.
- Proposed Activities:** Ground-disturbing works would be undertaken to facilitate the construction of residential housing, retail and commercial areas, schools, sports fields, lakes, reserves, stormwater management, and for the installation of services. Known Aboriginal heritage within the Overall Application Areas, as well as any discovered Aboriginal heritage, would be excavated and removed where necessary, to enable these works.

**Figure 1 – View looking southwest across Original Application Area (North)**



## Summary of key changes to this version of the consultation information pack

- **Throughout:** Wording has been updated throughout this document, where necessary. In-text references to attachments and pages within the document have also been changed.
- **Pages 6 and 7:** Clarification of previous authorisations under the *Aboriginal Heritage Act 1988* (SA) granted within the Overall Application Areas.
- **Pages 8 and 9:** Minor changes to reflect new information on pages 11 and 12.
- **Pages 12 - 13:** Additional information on the discovery of Aboriginal objects discovered by the Applicant since Project works began in 2021.
- **Pages 13 - 16:** Details for Aboriginal sites listed on AAR's central archives within 250 m of the 'Riverlea Project Masterplan'.
- **Pages 16 and 17:** Information is provided about previous Aboriginal cultural heritage surveys undertaken by ACHM in 2008 and 2013.
- **Pages 17 and 18:** Changes to reflect new information on pages 11 and 12.
- **Page 18:** The description of HIMA#2 has been updated.
- **Page 22:** Clarification on the possibility for unavoidable impacts to CMTs due to Project works. These changes are also made in Attachment 7.
- **Pages 24 and 25:** Updated consultation information, including details of a another community consultation meeting to be held on **Thursday 11 January 2024 at the Mawson Lakes Hotel, 10 Main Street, Mawson Lakes from 5:30 pm and extension to the consultation period until Thursday 25 January 2024.**
- **Attachments and attachment list (page 25):**

Key changes include:

- an additional map (Attachment 4) showing the Overall Application Areas in relation to known Aboriginal heritage, including nearby Aboriginal sites.
- amendments to Attachment 7
- a table of acronyms and abbreviations (Attachment 8)
- generally, depiction of Aboriginal sites within 250 m of the 'Riverlea Project Masterplan', precinct boundaries and updated satellite imagery.

**Information in this document is based primarily on information provided by the Applicant.**

References in this document to 'Overall Application Areas' means the following areas together, as depicted on the maps at [Attachments 1, 4, 5 and 6](#):

- Original Application Area (North)
- Original Application Area (South)
- Additional Application Area 1
- Additional Application Area 2
- Additional Application Area 3.

## INTRODUCTION

The Minister for Aboriginal Affairs, who is responsible for the *Aboriginal Heritage Act 1988* (SA) (Act), has received an application for authorisations under sections 21, 23 and 29(1)(b) of the Act from Walker Buckland Park Developments Pty Ltd (Applicant). The Applicant seeks to undertake extensive earthworks to prepare land for development at Riverlea Park, South Australia [within the Overall Application Areas](#) (Project). Some of these works are currently underway.

The Project would involve excavation and preparation of land across the Overall Application Areas to enable the construction of residential, retail, and commercial precincts with associated infrastructure.

[While the authorisations are sought for the Overall Application Areas, AAR notes that they form part of the Applicant's broader, long-term master planned 'Riverlea Project' development \('Riverlea Project Masterplan' hereafter\). That is, the Project is part of the broader Riverlea Project Masterplan.](#)

Attachment 1 shows the Overall Application Areas in relation to the [Applicant's 'Riverlea Project Masterplan'](#). Attachment 2 is an indicative depiction of how the Overall Application Areas would look following completion of Project works. However, the Applicant advises that the final Project layout may be subject to change. [Attachment 3, prepared by the Applicant, is an indicative depiction of Precincts 1 through 4 along with the Applicant's 'Riverlea Project Masterplan' and the Overall Application Areas \(shown in green\).](#)

The Overall Application Areas fall within the boundary of the 2018 Kurna People's Native Title determination. The Kurna People's native title rights and interests are represented by the Kurna Yerta Aboriginal Corporation RNTBC (KYAC).

The Original Application Areas contain extensive recorded Aboriginal sites, objects and remains (together, heritage), including Aboriginal ancestral burials, culturally modified trees, campsites and artefacts. In addition, parts of the Original Application Areas have been identified as containing potential archaeological deposits. The Gawler River (Kadlitparri), an important Kurna cultural site, intersects the northern boundary of Original Application Area (North).

No Aboriginal heritage is currently known to exist within the Additional Application Areas.

Section 21 of the Act makes it an offence to excavate land to uncover Aboriginal heritage without the Minister's authorisation, whilst section 23 of the Act makes it an offence to damage, disturb or interfere with Aboriginal heritage without the Minister's authorisation. Section 29(1)(b) makes it an offence to remove an Aboriginal object from the state, without the Minister's authorisation. As the Project would involve clearing the land for residential development in a way that would damage, disturb, or interfere with Aboriginal heritage, the Applicant has sought authorisations under sections 21, 23 and 29(1)(b) of the Act.

[During the Project](#), Aboriginal heritage would be managed under a Cultural Heritage Management Plan (CHMP) developed by Neale Draper and Associates [Pty Ltd](#) (ND&A) in consultation with Kurna representatives, KYAC, and the Applicant. Areas known to contain, or that are likely to contain, Aboriginal heritage, would be subject to archaeological excavation,

heritage monitoring, salvage and relocation, and the collection of samples suitable for scientific testing. Any additional Aboriginal heritage discovered during the Project would also likely be subject to archaeological salvage and reporting if it cannot be avoided.

Prior to considering whether to grant an authorisation, section 13 of the Act requires the Minister to understand and consider the views of a range of interested Aboriginal parties. Aboriginal Affairs and Reconciliation (AAR) conducts this consultation on the Minister's behalf, seeking the views of Traditional Owners, the State Aboriginal Heritage Committee (Committee) and other Aboriginal parties that the Minister considers may have an interest in the matter.

## **PROJECT OVERVIEW**

### **The Applicant**

The Applicant is a subsidiary of Walker Corporation Pty Ltd, a Sydney-based developer of master-planned residential communities and retail, commercial and industrial projects. The Applicant was registered as a company in 2008 to undertake a major residential development at Riverlea Park (formerly Buckland Park).

### **Project Background**

In June 2003, the then Minister for Urban Development and Planning made a major development declaration for the subdivision and development of land at Riverlea Park. The Applicant's fully developed 'Riverlea Project' would see 12,000 residential properties planned across its lifespan, which would house a new community of around 33,000 residents. The area was approved for major development in 2010 for five residential land division precincts, proposed over 25 years. The Applicant has subsequently consolidated the five precincts into four. Construction of the first phase of development (Precinct 1) commenced in 2021.

The [authorisations have](#) been sought primarily to enable Precinct 2, the second phase of the broader 'Riverlea Project [Masterplan](#)'. However, the Applicant has also sought the authorisations to cover portions of Precinct 1, and future precincts [to the extent that they intersect](#) the Overall Application Areas (that is, portions of Precincts 3 and 4). See Attachment 3, which provides an indicative depiction of Precincts 1 through 4. [Precincts 1 through 4 are also depicted on the maps at Attachments 1, 4, 5 and 6.](#) Further information about the Project, including an interactive masterplan map, can be accessed via AAR's website: [www.agd.sa.gov.au/heritage-applications](http://www.agd.sa.gov.au/heritage-applications).

### **Duration of authorisations sought**

The Applicant has sought the authorisations, if granted, to be valid for the life of the Project. The Applicant has therefore sought the authorisations to extend for 25 years from the date they are granted.

### **Overall Application Areas**

Riverlea Park is located within the City of Playford council area. It is located approximately 30 km north of Adelaide, south of the Gawler River (Kadlitparri) and west of Port Wakefield Road.

The Overall Application Areas comprise a moderately undulating landscape that has historically been used for agricultural and pastoral purposes, such as cropping and grazing. While the land



has been mostly cleared, the [Overall Application Areas](#) include remnant clusters of native trees, including river red gums.

The Original Application Areas comprised two separate areas: Original Application Area (North) and Original Application Area (South). Original Application Area (North) covers a total area of approximately 3,891,954 m<sup>2</sup> and is located north of Legoe Road and east of Tippets Bridge Road. It is bounded on its northern side by the Gawler River (Kadlitparri). Original Application Area (South), which covers a total area of approximately 1,047,589 m<sup>2</sup>, is situated south of Carmelo Road and east of Beagle Hole Road.

Thompson Creek, an historic waterway that now functions primarily as a stormwater outflow channel, flows in a south-westerly direction through the Overall Application Areas.

### **Additional Application Areas**

In late October 2023, the Applicant varied its application by expanding the Overall Application Areas to include three Additional Application Areas. These are bounded in blue on the maps at [Attachments 1, 4 and 5](#).

Given the cultural sensitivity of the general area, and the recent discoveries of Aboriginal heritage during Project works within Original Application Area (North), out of an abundance of caution, the Applicant has chosen to expand its Overall Application Areas to include the three Additional Application Areas.

This will avoid the need for separate application under the Act if heritage is discovered anywhere within the Additional Application Areas [and cannot be avoided](#). It will also ensure that any decision the Minister makes about the management of Aboriginal heritage will apply consistently [across the Overall Application Areas](#). Additional Application Area 1 adjoins the eastern side of Original Application Area (North), and straddles Precincts 1 and 2. It measures approximately 239,766 m<sup>2</sup>. The Applicant advises that approximately 75% of Additional Application Area 1 has already been surface stripped, with no Aboriginal heritage reported to AAR.

Additional Application Area 2 is a smaller area located along the western side of the Port Wakefield Highway, wholly within Precinct 1. It measures approximately 3,602 m<sup>2</sup>. The Applicant advises that approximately 50% of Additional Application Area 2 has already been surface stripped, with no Aboriginal heritage reported to AAR.

Additional Application Area 3 is located at the south-eastern corner of [the Applicant's 'Riverlea Project Masterplan' area](#). It is located entirely within Precinct 1. It measures approximately 380,364 m<sup>2</sup>. The Applicant advises that approximately 50% of Additional Application Area 3 has already been surface stripped and that a wastewater (sewerage) storage facility has been constructed there. No Aboriginal heritage has been reported to AAR in Additional Application Area 3.

AAR notes that large parcels of land to the west of the Overall Application Areas, but within [the Applicant's 'Riverlea Project Masterplan' area](#), are not included in this application. Separate authorisations under the Act may be required by the Applicant in respect of its long-term development plans that fall outside of the Overall Application Areas.

## Previous ministerial authorisations in the Overall Application Areas

### 2012 authorisations

In December 2012, section 21 and 23 authorisations were granted by the then Minister for Aboriginal Affairs and Reconciliation that permitted Walker Corporation Pty Ltd (parent company of the Applicant) and staff of Australian Cultural Heritage Management Pty Ltd (ACHM) (company previously run by the principal of ND&A) to excavate land to uncover any Aboriginal sites, objects or remains; to damage, disturb, or interfere with any Aboriginal sites; to damage any Aboriginal objects; or to disturb, interfere with, or remove any objects or remains found. The authorisations were granted for the following purposes:

1. to salvage surface artefacts within the area to be disturbed by construction activities
2. to conduct test excavations to determine the absence or presence of subsurface Aboriginal archeological materials in the sediments to be disturbed by the construction activities
3. to enable accurate delineation of the site boundaries based on the extent of the subsurface deposit
4. to salvage the cultural heritage materials within the portion of the site that will be disturbed by construction activities
5. to complete a catalogue of the artefacts salvaged and conduct some analysis to learn more of the nature of the site and its contents

The 2012 authorisations applied to the southern portion of site 6628-7788. They were subject to conditions, including requirements for backfilling of the site following excavations, provisions for the housing of any cultural materials recovered, reporting to the Kurna Nation Cultural Heritage Association and AAR, and compliance with AAR's then Aboriginal Heritage Discovery Protocols.

In February 2013, archaeological artefact collection and excavations occurred under the 2012 authorisation by ACHM archaeologists and Kurna representatives. As a result of this archaeological work:

- 11 Aboriginal artefacts were identified, recorded, and collected
- 14 test pits 40 x 40 cm were excavated with no Aboriginal heritage identified within any of them
- A single 1 m x 1 m trench was excavated with no Aboriginal heritage identified within it.

A 2013 ACHM report detailed the results of the activity outlined above.

In its consultation information pack of 31 October 2023, AAR indicated its view that the 2012 authorisations were superseded by subsequent authorisations under the Act granted in 2014.

Whether or not that was the case, the 2012 authorisations were granted to permit Walker Corporation Pty Ltd, ACHM and their employees (some of whom were named), contractors or agents to undertake works described above within the southern portion of site 6628-7788. AAR notes that ACHM is no longer in existence and so can no longer be the subject of authorisations.

The authorisations granted did not include an end date. Nonetheless, the Applicant advises AAR that it intends to rely upon the authorisations sought over the Overall Application Areas, if

granted, rather than the 2012 authorisations granted to its parent company, irrespective of their scope or validity.

2014 authorisations

In August 2014, section 21 and 23 authorisations were granted by the then Minister for Aboriginal Affairs and Reconciliation to enable Walker Corporation Pty Ltd and ACHM staff to conduct archaeological excavations within the 'Riverlea Project Masterplan' area.

AAR has been advised by the Applicant that despite the 2014 authorisations being granted, no archaeological excavation works ever took place under them. The 2014 authorisations expired on 31 December 2015.

**ABORIGINAL HERITAGE**

Records available to AAR indicate that the Overall Application Areas intersect an area of high Aboriginal heritage sensitivity. The Overall Application Areas intersect ancestral Aboriginal burial areas, culturally modified (scarred) trees (CMTs), Aboriginal campsites, [stone artefacts](#), hearth/oven features, and a culturally important Kurna anthropological site associated with the Gawler River (Kadlitparri). The Overall Application Areas also contain three areas identified by ND&A as Heritage Impact Mitigation Areas (HIMAs), due to their high likelihood of containing sub-surface archaeological material. The HIMAs are discussed in further detail below.

Table 1 lists Aboriginal sites and HIMAs that are known to AAR within the [Overall Application Areas](#).

**Table 1 - Aboriginal heritage sites and areas of high archaeological potential**

Site Number	Site Name	Type/Description	Site Status	Original Application Area
6628-7788	Buckland Park Archaeological Site 2	Archaeological	Listed	North
6628-7792	Buckland Park Artefact Scatter 1	Archaeological	Listed	North
6628-7791	WAL01-003	CMT	Listed	North
6628-7793	WAL01-006	CMT	Listed	North
N/A	CMT-01	CMT	Reported	North
N/A	CMT-02	CMT	Reported	North
N/A	CMT-03	CMT	Reported	North
N/A	CMT-04	CMT	Reported	North
N/A	CMT-05	CMT	Reported	North
N/A	CMT-06	CMT	Reported	North
N/A	CMT-07	CMT	Reported	North
N/A	Kadlitparri (Wild Dog River)	Cultural/anthropological	Reported	North
N/A	Burial Location 1	Burial	Reported	North
N/A	Burial Location 2	Burial	Reported	North
N/A	HIMA#1	Area of high archaeological potential	Reported	North

N/A	HIMA#2	Area of high archaeological potential	Reported	North
N/A	HIMA#3	Area of high archaeological potential	Reported	South

Maps at [Attachments 4, 5 and 6](#) depict all known Aboriginal heritage sites and HIMAs [listed in Table 1](#).

Please note that geospatial records held on AAR’s central archives vary in accuracy. Many site locations were recorded prior to modern GPS technology. The precise location, full geographic extent, or on-ground orientation of Aboriginal heritage sites may not be reflected accurately on the attached maps. For these reasons, site information depicted on the attached maps should be considered indicative only. [The potential archaeological deposits \(PADs\) referenced below have been incorporated by ND&A into HIMAs. See page 17. For this reason, the PADs are not depicted in the attached maps.](#)

**Aboriginal heritage within Original Application Area (North)**

AAR’s central archives list four Aboriginal sites that intersect Original Application Area (North). These comprise two archaeological sites: site 6628-7788 and site 6628-7792, and two CMTs: 6628-7791 and 6628-7793.

In addition to this, a further seven CMTs were reported to AAR by ND&A following its 2022 cultural heritage [survey](#) described below. The Gawler River (Kadlitparri) has also been reported to AAR as an important Kurna cultural and anthropological site. It intersects the northern edge of Original Application Area (North).

In addition to recorded Aboriginal heritage within Original Application Area (North), two areas highly likely to contain subsurface archaeological deposits and cultural material have also been identified. These are referred to by ND&A as PADs.

[A 2022 cultural heritage survey undertaken by ND&A identified 48 archaeological features and isolated artefacts across Original Application Area \(North\), located close to the previously recorded sites and PADs. In addition, potential Aboriginal objects were identified in the southern section of Original Application Area \(North\) during works associated with drainage channel and haul road construction – see below.](#)

Heritage sites referenced above [that are](#) within Original Application Area (North) are depicted on the [maps at Attachments 4 and 5](#). Further details on the Aboriginal heritage known to exist within Original Application Area (North) are provided below.

*Buckland Park Archaeological Site 2 (site 6628-7788), PAD 3 and PAD 5*

Originally recorded in 2008 by ACHM, site 6628-7788 was recorded as a series of exposed deposits exhibiting a *“large number of quartz flakes and flaked pieces”*, as well as river cobbles used as anvils and hammerstones. Potential oven material was also observed.

During its 2022 cultural heritage survey, ND&A observed 13 exposed archaeological features, including cobble artefacts, hearth ovens, and stone artefacts within site 6628-7788. ND&A describes the site as comprising *“exposures of an extensive camping area used repeatedly by large numbers of people”* and, in the context of the Project, recommends an *“archaeological salvage and recording program...to provide culturally and scientifically important information and preserve traditional artefacts”*.

ACHM also recorded a large area immediately north of site 6628-7788, and another to the west of site 6628-7788, that it considered to be PADs. These were recorded as PAD 3 and PAD 5 respectively.

Both PAD 3 and PAD 5 are situated along Thompson Creek (or its tributaries) and are located on landforms that are often associated with the discovery of Aboriginal heritage. It is therefore likely that a heightened risk exists that subsurface heritage is present in these areas.

In total, ND&A's August 2022 heritage survey, carried out with Kurna representatives, observed 48 archaeological features (stone and flaked glass artefacts, oven stones/hearth materials) within or close to site 6628-7788, PAD 3 and PAD 5. In addition, potential Aboriginal objects were identified by cultural heritage monitors during earthworks associated with drainage channel and haul road construction works. See page 11 and 12 of this document for further information.

#### Buckland Park Artefact Scatter 1 (site 6628-7792)

Originally recorded in 2008 by ACHM, site 6628-7792 was described as an artefact scatter comprising quartz flakes and flaked pieces with some unidentified shell fragments and a flaked cobble. ND&A's 2023 heritage survey report for the Project describes site 6628-7792 as consisting most probably of a "shallow, subsurface archaeological campsite deposit" that has been subjected to historic disturbance through ploughing, fencing, track creation and drainage excavations along Thompson Creek. ND&A notes that the absolute depth, extent or contents of the site are not known as this time.

#### Culturally modified trees (CMTs)

AAR's central archives hold records for two CMTs within Original Application Area (North). An August 2022 cultural heritage survey undertaken by ND&A identified an additional seven CMTs. Six of these are living trees, while the seventh (CMT-03) is a dead tree trunk lying near to the bank of the Gawler River (Kadlitparri). ND&A considers that this trunk is not in its original position and has been moved at some time in the past. See locations of all nine CMTs on the maps at Attachment 4 and 5.

#### Kadlitparri (Wild Dog River) – Reported Men's Cultural Site

In May 2018, following AAR's section 13 consultation in relation to the state government's Gawler East Link Road Project, ND&A carried out an anthropological survey with Kurna representatives on the intersection of the Gawler East Link Road Project area and the South Para River. As a result of this survey, a confidential men's cultural site card was submitted to AAR relating to a Kurna cultural site, which incorporates the Gawler and South Para Rivers.

The confidential site card and accompanying report have been added to AAR's records. The boundary of the Kadlitparri (Wild Dog River) site intersects the northern edge of Original Application Area (North) by up to 90 m.

#### **Aboriginal heritage within Original Application Area (South)**

In 2008, ACHM recorded a PAD that intersects the Applicant's Original Application Area (South). Named PAD 6, the area is described as comprising a 'y-shaped' section of Thompson Creek,



where two tributaries join to the main channel. The boundary of the PAD was re-recorded in 2013 by ACHM and Kurna representatives to better follow the alignment of Thompson Creek. Archaeological test excavations were recommended by ACHM to better understand the extent and significance of the area.

A November 2022 cultural heritage survey carried out by ND&A, in consultation with Kurna representatives, found *“a few isolated artefacts...in the vicinity of the creek along PAD 6”*.

No other Aboriginal sites are currently known to exist within Original Application Area (South).

### **Discovery of burial locations during Project works - 2023**

#### Burial Location 1 – April 2023

In December 2022, the Applicant commenced Project works, [separate to the drainage channel/haul road corridor works that commenced in June 2022 described on page 11](#). The [December 2022 Project works commenced](#) under a ‘risk management’ approach within parts of the Overall Application Areas that it considered to be low risk from a heritage [discovery and impact](#) perspective. The Applicant’s risk management approach included:

- undertaking a cultural heritage survey over parts the Overall Application Areas
- developing a CHMP (discussed later in this document)
- engaging heritage monitors to observe designated ground-disturbing works
- creating protective zones around known Aboriginal heritage sites and PADs.

In late April 2023, during the removal of topsoil and vegetation, the Applicant encountered a shallow Aboriginal burial site in Original Application Area (North). This is known as Burial Location 1. AAR was notified of the discovery, as per the requirements of the Act and in accordance with the Project’s CHMP. An exclusion zone was also established around the burial site (Exclusion Zone).

During and following AAR’s inspections of Burial Location 1, Kurna heritage monitors and KYAC representatives expressed their concerns that stopping the excavation was not the most appropriate course of action, as it would increase the risk that the remains may sit exposed and unprotected while the [Applicant’s request for ministerial authorisations to excavate and relocate them was pending](#).

On 6 June 2023, the Minister issued a direction to the Applicant under section 20(3) of the Act for the immediate protection and preservation of the remains. Specifically, the Minister’s direction:

- required the Applicant to give KYAC and others access to the Exclusion Zone for the sole purpose of excavating the land under KYAC’s leadership for the preservation, protection and reburial of the remains
- allowed the remains to be removed and re-located to a location acceptable to KYAC for their protection and preservation
- permitted Project works to resume within the Exclusion [Zone](#) only once the remains have been appropriately removed.

The Minister’s covering letter to the Applicant enclosing the direction advised that it will not be possible for the Minister to make further section 20(3) directions to excavate heritage, and that

any further discoveries must be cordoned off and avoided unless an authorisation under sections 21 and 23 is achieved.

The Minister, in his capacity as Attorney-General, also granted the relevant approval under the *Burial and Cremation Act 2013* (SA) to allow for the excavation of the remains in the Exclusion Zone.

As of 23 August 2023, 25 individual burials had been identified within the Burial Location 1 Exclusion Zone. Burial Location 1 is shown on the [maps at Attachments 4 and 5](#).

Due to the large number of Aboriginal ancestral remains that had been discovered within Burial Location 1, and the high likelihood that additional remains would be discovered, the Minister revoked his direction on 23 August 2023.

In his 23 August 2023 letter to the Applicant, the Minister advised that no further burial excavation works [could](#) occur within the Burial Location 1, or anywhere else within the Project area.

Since the Minister's revocation of his direction, no further burial excavation works have occurred within the Project area. Of the 25 separate burials identified within Burial Location 1, 23 have been excavated and exhumed by Kurna heritage monitors and ND&A archaeologists, under the direction of KYAC.

The excavated remains are currently held on-site and [are now](#) secured in a [dedicated remains storage facility](#), under the care and control of KYAC. AAR understands that the two other burials that have been found but not exhumed, currently remain in the ground at Burial Location 1 and have been covered for their protection.

#### Burial Location 2 – May 2023

On 30 May 2023, AAR was notified that an additional shallow burial site, containing at least two individuals, had also been discovered (Burial Location 2), approximately 300 metres northeast of Burial Location 1, within Original Application Area (North). AAR has subsequently been advised that in total, up to four Aboriginal burials were identified within Burial Location 2. AAR understands that some of the disturbed remains associated with these burials were retrieved [from the surface](#) and stored within [remains storage facility](#) currently within Burial Location 1.

[However](#), consistent with the Minister's 6 June 2023 letter to the Applicant, no [burial](#) excavation works have been undertaken in this area to-date. AAR understands that a 50 m radius exclusion zone around the discovery has been cordoned off with flagging tape, and the remains have been covered.

Burial Location 2 is depicted on the [maps at Attachments 4 and 5](#). For further information about these discoveries, consultees are encouraged to contact AAR.

#### Isolated bone fragment discoveries - 10 July and 21 September 2023

On 10 July and 21 September 2023, two separate discoveries of isolated fragmentary human bone were made. Assessments made by Forensic Science SA concluded that these fragments are likely to be Aboriginal remains. The locations of these discoveries are shown on the [maps at Attachments 4 and 5](#).

The first of these discoveries was made approximately 26 m away from the boundary of Additional Application Area 1, on 10 July 2023. AAR is advised by the Applicant that the bone

fragments were likely transported to the location within fill (spoil) material taken from elsewhere in the Project area.

On 21 September 2023, bone fragments were found during service trenching within Original Application Area (North). AAR is advised by the Applicant that the fragments are also likely to have been introduced from fill (spoil) material taken from elsewhere in the Project area. Without authority to excavate the area further to determine if there may be additional in-situ heritage, the discovery area is being avoided.

### **ADDITIONAL INFORMATION PROVIDED BY THE APPLICANT – NOVEMBER 2023**

On 22 November 2023, the Applicant notified AAR that it discovered up to 421 potential Aboriginal objects within, or near to, the Overall Application Areas between 2021 and 2023. Details about these discoveries, separated by area, are provided below:

#### **Aboriginal objects within the Overall Application Areas**

##### Drainage channel/haul road corridor

The Applicant advises that between approximately June 2022 and February 2023, one-hundred and five (105) potential Aboriginal objects were discovered by Kurna cultural heritage officers observing earthworks associated with drainage channel and haul road construction undertaken by the Applicant. These earthworks occurred in the southern portion of Original Application Area (North).

The Applicant advises that the 105 objects, which are primarily made of quartz, have not been subject to an archaeological examination to confirm whether they are Aboriginal objects.

The Applicant advises that 85% to 90% of the 105 potential Aboriginal objects were collected, bagged and labeled by Kurna cultural heritage officers and subsequently stored in a locked container within the Project area for further archaeological examination. The area in which this collection occurred intersects site 6628-7788 and is marked in brown on the maps at Attachments 4 and 5. The Applicant advises that the remaining 10% to 15% of the potential Aboriginal objects, found outside the area marked in brown at Attachments 4 and 5, have been retained in-situ.

##### Burial Locations 1 and 2

The Applicant advises that a total of three hundred and two (302) potential Aboriginal objects have been discovered within the areas known as Burial Location 1 and Burial Location 2. The Applicant advises that two hundred and seventy-five (275) of these were found during excavations carried out pursuant to the 6 June 2023 ministerial direction issued under the Act for Burial Location 1, as well as during sieving of associated spoil material.

The Applicant advises that, to-date, only 24 of the 275 objects found within Burial Location 1 have been subject to archaeological examination. These 24 objects have been assessed by ND&A as being Aboriginal artefacts.

Of these 24 artefacts, the Applicant says that they mainly comprise “*quartz bipolar flakes, segments, cores, and rare shaped, retouched cutting tools. There are some quartzite...[cobble].../pebble hammer stones, anvils, grindstones, cores – often with a combination of these items, and*

*a small number of cutting flakes. There is a small but significant percentage of small silcrete flakes and cores of imported stone”.*

The remaining potential Aboriginal objects from Burial Location 1 have not yet been subject to an archaeological examination to confirm whether they are Aboriginal objects.

The Applicant advises that 27 objects were also discovered within Burial Location 2. These objects have been assessed and verified by ND&A as Aboriginal artefacts.

The Applicant advises that all potential and verified Aboriginal objects discovered in the burial locations outlined above were collected, bagged and labelled by Kurna cultural heritage officers and are stored in a locked container within the Project area.

### **Aboriginal objects adjacent to the Overall Application Areas**

Precinct 1 - the Applicant advises that between approximately May and December 2021, six Aboriginal objects were discovered by Kurna cultural heritage officers within Precinct 1 during the first phase of the Applicant’s broader Project, outside the Overall Application Areas.

The Applicant advises that the discovered objects were collected, bagged and labelled by Kurna cultural heritage officers and stored in a locked container within the Project area.

**Note:** the Applicant previously advised that only three isolated objects had been identified and recorded in Precinct 1. This information was included in AAR’s amended consultation information pack dated 31 October 2023. It is amended in this version of the document.

Precinct 3 - in addition, the Applicant advises that in July 2023, eight Aboriginal objects were discovered during a heritage survey undertaken by ND&A and Kurna representatives. These Aboriginal objects were found outside of the Overall Application Areas, in an area west of Original Application Area (North). The Applicant advises that the Aboriginal objects have not been collected and remain in-situ.

### **KNOWN ABORIGINAL HERITAGE ADJACENT TO THE OVERALL APPLICATION AREAS**

The area immediately surrounding the Overall Application Areas also contains Aboriginal sites.

The Aboriginal sites listed below in purple (and marked on the maps at Attachments 4, 5 and 6) were not included in the previous version of AAR’s consultation information pack. The previous version only included Aboriginal heritage within the Overall Application Areas and one immediately adjacent Aboriginal site (PLA-01).

In response to requests from interested Aboriginal parties for further information, this section now includes information about Aboriginal sites listed on AAR’s central archives that are within 250 m of the Applicant’s ‘Riverlea Project Masterplan’ area (depicted in orange on Attachments 1, 4, 5 and 6). See Table 2. This additional Aboriginal site information is provided to assist consultees to understand the broader heritage landscape within which the Overall Application Areas are located.

Of the 30 Aboriginal sites within 6 km of the ‘Riverlea Project Masterplan’ that are either listed on AAR’s central archives, and otherwise known to AAR through formal site reports, 22 of them intersect the ‘Riverlea Project Masterplan’ (see Tables 1 and 2). Of these 22 sites, 14 intersect the Overall Application Areas (See Table 1). These numbers do not include HIMAs or PADs.

However, AAR notes that the central archives are not an exhaustive record of Aboriginal heritage. Additional Aboriginal sites are highly likely to exist within and outside the Overall Application Areas. Further, the density of sites known to exist within the Overall Application Areas may also reflect the multiple Aboriginal heritage surveys that have occurred within the Overall Application Areas since at least 2008.

**Note:** The Aboriginal sites listed in Table 2 are outside the Overall Application Areas. They will not be impacted by Project works for which the Applicant has sought authorisations under the Act. However, AAR notes that each of the eight sites listed in Table 2 intersect the Applicant’s broader ‘Riverlea Project Masterplan’ area (see maps at Attachments 4, 5 and 6). Separate and future authorisations would be required to impact these sites.

**Table 2 - Known Aboriginal heritage near to the Overall Application Areas**

Site Number	Site Name	Type/Description	Site Status
N/A	Riverlea Park Archaeological Campsite (PLA-01)	Archaeological	Reported
6628-7790	Buckland Park Mound 2	Mound	Listed
6628-7789	Buckland Park Mound Complex 1	Mound	Listed
6628-4577	Tippets Bridge Road Scarred Tree	CMT	Listed
6628-7795	WAL01-010	Archaeological	Listed
6628-7794	WAL01-009	Archaeological	Listed
6628-4576	Thompson Creek Artefact Scatter	Archaeological	Listed
6628-4578	Beagle Hole Road Artefact Scatter	Archaeological	Listed

Riverlea Park Archaeological Campsite (PLA-01) – this site is described as a very large archaeological campsite featuring exposures of charcoal, ash and organics, hearth materials, and thousands of stone artefacts. This site was recorded in August 2022 by ND&A and Kurna representatives during a separate survey for the City of Playford. The site, which is outside the Overall Application Areas, is located immediately south of site 6628-7788, on the southern side of Legoe Road.

Buckland Park Mound 2 (6628-7790) - this site is described as a large oval-shaped mound (measuring 150 m east to west by 100 m north to south) with a maximum elevation of approximately 2 m. The mound is readily identified due to its elevation and highly uncharacteristic soft, orange-brown silty sediments that contrast against the surrounding flat landscape. The mound is covered in thick vegetation, which contrasts against the surrounding vegetation of the area. No cultural heritage was observed on the surface of the mound; however, ground surface visibility was low at the time of recording.

This mound may originally have been an extension of Buckland Park Mound Complex 1 (6628-7789), located approximately 150m east of this site. However, due to erosion over time, it has formed a separate discrete mound. This site was recorded in September 2008 and October 2011 by ACHM archaeologists and Kurna representatives. The site, which is outside the Overall Application Areas, is located approximately 440 m west of Original Application Area (North) and approximately 90 m south of the Gawler River (Kadlitparri).



Buckland Park Mound Complex 1 (6628-7789) - this site is described as a large oval-shaped mound (measuring 300 m east to west by 100 m north to south) with a maximum elevation of approximately 2 m. It is similar in its characteristics to site 6628-7790.

No cultural heritage was observed on the surface of the mound; however, ground surface visibility was low at the time of recording. This mound site is associated with a freshwater spring or soak, and two CMTs, one on the northern and one on the southern side of the mound, described respectively as shelter and canoe trees, based on the pattern of bark removal. This site was recorded in October 2011 by ACHM archaeologists and Kurna representatives. The site, which is outside the Overall Application Areas, is located approximately 100 m west of Original Application Area (North) and approximately 180 m south of the Gawler River (Kadlitparri).

Tippets Bridge Road Scarred Tree (6628-4577) - this site is described as a 20 m tall, living river red gum with a possible canoe scar cut out of the main trunk (measuring 1.9 m long by 0.4 m wide). The scar is “quite overgrown” indicating significant regrowth since the bark’s removal. The tree was recorded as likely being around 200 years old given this species rate of growth. The tree is situated on the floodplain of the Gawler River (Kadlitparri). This site was recorded in December 1997 by archaeologist, Vivienne Wood. The site, which is outside the Overall Application Areas, is located approximately 70 m west of Original Application Area (North) and approximately 300 m south of the Gawler River (Kadlitparri).

WAL01-010 (6628-7795) – this site is described as a localised artefact scatter. It was recorded in September 2008 and October of 2011 by ACHM archaeologists and Kurna representatives. Approximately 20 artefacts were observed to be eroding from a minor exposure on the eastern bank of the main alignment of Thompson Creek, 10-20 cm below the surface. The material includes small flakes and flaked pieces of coarse quartz, quartzite and silcrete. Despite erosion by wind and water, the site’s condition was described as fair and was considered highly likely to contain intact subsurface archaeological deposits. The site, which is outside the Overall Application Areas, is located approximately 360 m south of Original Application Area (North) and 380 m southeast of the corner of Legoe and Tippets Bridge Roads.

Based on recent satellite imagery, it appears that a portion of this site may have been impacted by previous development associated with agricultural activities. AAR notes that while the site is not located within the Overall Application Areas, it is located within the Applicant’s broader ‘Riverlea Project Masterplan’ area. However, the land is not currently owned by the Applicant.

WAL01-009 (6628-7794) - this site is described as an artefact scatter. It was recorded in September 2008 and October of 2011 by ACHM archaeologists and Kurna representatives. Approximately 30 artefacts were observed lining a sharp bend on Thompson Creek, scattered over approximately 80 m. Artefacts were also found to be eroding from the creekbank from a depth of 15-25 cm below the surface. The assemblage comprised quartz, quartzite and silcrete flakes and flaked pieces. Despite erosion by wind and water, the site’s condition was described as fair and highly likely to include intact subsurface archaeological deposits.

The site, which is outside the Overall Application Areas, is located approximately 300 m north of Original Application Area (South) and 530 m southeast of the corner of Legoe and Tippets Bridge Roads.

Thompson Creek Artefact Scatter (6628-4576) – this site is described as an artefact scatter, numbering less than 20 objects, exposed along the southern side of a fence line and the northern side of Thompson Creek. The recorded assemblage comprised quartz flakes and two quartzite hammerstones. The site measures approximately 70 m x 10 m.

This site was recorded in December 1997 by archaeologist, Vivienne Wood. The site, which is outside the Overall Application Areas, is located approximately 280 m northeast of Original Application Area (South), along the northern edge of Carmelo Road. The site record states that the area had been subject to various types of disturbance including construction of a road and fence; however, it was possible that some of the artefacts remained in-situ.

Beagle Hole Road Artefact Scatter (6628-4578) - this site was recorded by archaeologist Vivienne Wood in December 1997 as a sparse artefact site, numbering less than 15 small (less than 2 cm) unmodified quartz flakes and flaked pieces, exposed over a low dune. The site area measures approximately 45 m x 40 m. The site, which is outside the Overall Application Areas, is located approximately 25 m west of Beagle Hole Road. The site record reports that the site is highly disturbed and in poor condition due to erosion and vehicle access.

### **Cultural Heritage Surveys and Inspections**

#### Previous ACHM survey – 2008

In 2008, ACHM was commissioned by Walker Corporation Pty Ltd to undertake cultural heritage surveys within the 'Riverlea Project Masterplan' area. This field survey was carried out by ACHM archaeologists and anthropologists, with Kurna representatives, between 16 and 25 June 2008. As a result of this survey, four archaeological sites and two CMTs were identified. In addition, seven PADs were identified.

The four archaeological sites recorded are now listed on AAR's central archives as: 6628-7788, 6628-7792, 6628-7794 and 6628-7795. The two CMTs that were recorded are also now listed on AAR's central archives as: 6628-7791 and 6628-7793.

Of the seven PADs recorded by ACHM in 2008, PADs #3 and #6 intersect the Overall Application Areas. AAR understands that, in 2013, ACHM expanded its recorded boundary for PAD #5 and so it now also intersects the Overall Application Areas.

#### Previous ACHM survey – 2013

In 2011, ACHM was commissioned by Walker Corporation Pty Ltd to undertake a cultural heritage survey of the 'Riverlea Project Masterplan' area, excluding Precinct 1 and site 6628-7788. This field survey sought to inspect the six Aboriginal sites and seven PADs previously recorded by ACHM in the area. The survey was carried out by ACHM archaeologists and anthropologists, with Kurna representatives, between 24 and 26 October 2011. AAR notes that subsequent ACHM report is dated May 2013 despite the fieldwork occurring in 2011.

As a result of this survey, boundaries of previously recorded sites and PADs were re-assessed and adjusted where necessary. Relevant to the Applicant's current Overall Application Areas, the boundaries of PADs #5 and #6 were modified. Pad #5 was expanded to the north and south - bringing it into the Original Application Area (North), while PAD #6 was modified to follow more closely the alignment of Thompson Creek.

PADs identified by ACHM in 2008 were also re-assessed, with some being re-classified by ACHM as Aboriginal mound sites. Two of these PADs, located outside the Overall Application Areas, subsequently became central archives sites 6628-7789 and 6628-7790.

Additional Application Areas 2 and 3 - 2008 to 2013 and 2021

The Applicant advises that parts of Precinct 1, including parts of the Additional Application Areas, were subject to two Aboriginal heritage surveys between 2008 and 2013. These were carried out by Kurna representatives and ACHM heritage consultants. The Applicant advises that throughout these surveys, no Aboriginal heritage was identified **within the three Additional Application Areas**. However, ground surface visibility at the time of these surveys was limited due to the use of the land for agriculture.

The Applicant advises that a heritage site inspection was conducted in early 2021 over Precinct 1, at the same time as surface stripping of vegetation and topsoil carried out by the Applicant. As a result of this inspection, the Applicant advises that six isolated Aboriginal objects were identified and recorded. The Applicant advises that the six Aboriginal objects identified are outside the three Additional Application Areas (see page 12).

Original Application Areas and Additional Application Area 1 - August and November 2022

ND&A has been engaged by the Applicant to provide a cultural heritage assessment (survey) report and associated CHMP for the Project. To better understand the location and nature of the Aboriginal heritage, Kurna Traditional Owners, employed through RAWsa, participated in cultural heritage surveys of the Original Application Areas and Additional Application Area 1 in consultation with ND&A in August and November 2022.

The surveys included a condition inspection of the previously recorded Aboriginal sites and PADs, as well as the Gawler River (Kadlitparri) zone and tributaries and channels along Thompson Creek. The 2023 ND&A cultural heritage assessment report found that there was a high concentration of exposed artefacts, hearth materials – evidence of long-term traditional camping – concentrated along Thompson Creek.

While no burials were observed during the surveys, the report advised that burials are frequently associated with Aboriginal camping and mound sites. It also noted that burials were known to have been discovered on nearby projects.

In total, ND&A recorded around 48 archaeological objects and features (i.e. stone artefacts, oven material) within Original Application Area (North).

However, the report notes that due to thick ground cover across the survey area, the results of the surveys should be considered as a ‘minimum record’ of exposed archaeology within the area inspected.

In addition, the 2023 ND&A report references potential Aboriginal objects identified by Kurna cultural heritage officers during earthworks associated with drainage channel and haul road construction works, in the southern portion of Original Application Area (North). See page 11 for further information.

The 2023 ND&A report concludes that the range of heritage features and their high density is consistent with other Aboriginal camping areas on the Adelaide Plains. The 2023 ND&A report also details the recent discoveries of Burial Locations 1 and 2, and notes that further burials could be present in the area.

Proposed heritage management measures

To manage Aboriginal heritage prior to, and during Project works, the 2023 ND&A report recommends the following heritage management measures:

- archaeological recording and excavation; test trenching using a backhoe; collection, analysis and storage of archaeological materials to be carried out in relation to sites 6628-7788, 6628-7792, and HIMAs #1 through #3
- recording and collection of isolated artefacts and the salvage of any additional archaeological features that may be encountered during Project works within the Original Application Area
- archaeological excavation, salvage, recording, analysis and reburial of known Aboriginal burials
- archaeological excavation, salvage, recording, analysis and reburial of any other Aboriginal ancestral remains discovered within the Original Application Area, where they cannot be retained in-place
- collection and destructive testing of samples, including archaeological samples for radiocarbon and OSL dating, and samples of human bone for isotopic, radiocarbon and DNA analysis. Removal of these samples from the state may also occur to facilitate such testing.

See [Attachment 7](#) for further details on the above measures.

Heritage Impact Mitigation Areas

A key outcome of the 2022 ND&A surveys was the identification of HIMAs. These HIMAs are known high-risk heritage areas designated for targeted archaeological recording, excavation, salvage and for the relocation of Aboriginal heritage, prior to any Project works commencing in these areas.

ND&A has identified two HIMAs within Original Application Area (North), and one within Original Application Area (South). These areas would be subject to a range of archaeological recording and salvage methodologies, given their known or potential heritage significance. The three HIMAs are indicated on the maps at [Attachments 4, 5 and 6](#).

Located in Original Application Area (North), HIMA#1 [encompasses](#) site 6628-7792 and includes a 50 m radius zone to encompass any subsurface heritage beyond the known site boundary. South of this is HIMA#2, a second, much larger, mitigation area, which incorporates site 6628-7788, PAD 3, PAD 5, [some 48 archaeological objects and features identified by ND&A in 2022, and other potential Aboriginal objects identified in the southern section of Original Application Area \(North\) during earthworks associated with drainage channel and haul road construction.](#)

Located in Original Application Area (South), HIMA#3 is a single elongated area that generally follows the boundary of PAD 6. As noted above, PAD 6 follows the Thompson Creek stormwater outflow in a south to south-easterly direction south of Carmelo Road.

If authorised by the Minister, each of the three HIMAs would be subject to up to nine heritage excavation and recording measures, depending on the nature of the feature and the potential for further discoveries. See [Attachment 7](#) for details on the heritage management measures that would be carried out within each HIMA.

## Cultural Heritage Management Plan

On 5 July 2023, the KYAC Board provided its written endorsement for the Project CHMP, which has been developed by ND&A in consultation with Kurna Traditional Owners, KYAC and the Applicant. The Applicant advises that while the CHMP was initially developed only to cover the Original Application Areas (North) and (South), it has now been broadly adopted for use across the entirety of the Project, including the three Additional Application Areas.

The CHMP states that its purpose is to:

- ensure the Applicant meets its legal obligations in relation to the management of Aboriginal heritage, through compliance with the Act and the *Coroners Act 2003* (SA)
- implement heritage management recommendations made by KYAC
- minimise impacts to the 'cultural heritage environment through responsible heritage management'
- achieve the Applicant's 'vision of best practice heritage management'

In aiming to achieve the above, the CHMP imposes protocols for the discovery of Aboriginal heritage, as well as all heritage protection and salvage work associated with the Project.

The CHMP outlines the role of KYAC and Kurna Traditional Owners, which would include:

- approving the content of the CHMP
- monitoring of ground disturbing works in areas designated to have high heritage sensitivity or risk
- providing cultural heritage awareness and discovery management inductions for Project staff
- participating in 'heritage mitigation activities', including archaeological salvage, analysis and reporting.

### Aboriginal heritage monitoring

The CHMP emphasises the importance of Aboriginal heritage monitors observing the 'stripping' or removal of topsoil and vegetation, prior to large scale Project works commencing.

The CHMP outlines heritage monitoring processes to be undertaken during ground disturbing works associated with the Project, which would comprise the following:

- continuous monitoring of ground disturbing work for initial surface stripping of vegetation and topsoil
- where loose sandy soil is present (which may indicate a remnant dune), initial surface stripping of vegetation and approximately 10 cm of topsoil would be continuously monitored, followed by the periodic monitoring of excavations to a depth of 60 cm. After completion of the monitoring and inspection process, the excavated surface would then be compacted, and further Project works would be carried out by the Applicant
- where sub-surface soil is assessed as having a high risk of containing archaeological material or burials, excavations at those locations would be as dot point 2 above. In addition, trench excavations to a maximum depth of 3 m or to the level of basal clay,



whichever is less, may also be monitored. This process may also be applied within a radius of 50 m of any other significant heritage discoveries during Project works.

These monitoring processes would increase the likelihood that any unrecorded Aboriginal heritage that exists on or below the ground surface is identified. The Applicant advises that this approach would enable the Project heritage consultant to conduct early archaeological inspection of the stripped area and advise on the level of management required for further excavations.

In addition to the above, where the soil type warrants, geotechnical borehole and sub-surface investigations may be monitored by Kurna heritage monitors. The results of these investigations may be mapped by the Project heritage consultant to better understand the scope of archaeological potential across the Project.

#### Heritage Protection Zones (HPZs)

The CHMP also identifies a series of Heritage Protection Zones (HPZs) that correspond with known Aboriginal heritage sites and archaeological features recorded within the Original Application Areas. In effect, these HPZs will remain off limits to all Project activities until such time as authorisations under the Act are granted by the Minister, and then only after the excavation and archaeological salvage methodologies specific to each have been completed.

The CHMP states that any unauthorised access into a HPZ will constitute a breach of the CHMP, and any such activity will be deemed a reportable incident that will be reported to the Applicant's Project Supervisor.

#### Other relevant elements of the CHMP

- where there are more than two work fronts operating at one time (i.e. two separate machines in operation), or where any two work fronts are more than 25 m distant from one another, more than two Kurna heritage monitors will be required for monitoring
- a minimum of one Kurna heritage monitor will be engaged to observe any works undertaken by specified machinery, such as 'land planes' and 'scrapers'
- recommendations on the use of machinery buckets that are less impactful to potential sub-surface heritage
- monthly planning meetings between the Applicant, RAWsa and the Project heritage consultant to identify 'high-risk work activities' and areas that require Kurna heritage monitoring. These meetings will also allow for forward-planning of Kurna inspections across the Project for the upcoming month
- a weekly progress and planning meeting will be held between the Applicant, its principal construction contractor, RAWsa and two KYAC representatives.
- monthly meetings between the Applicant and the KYAC Chairperson, and two nominated Kurna representatives
- project excavation staff and contractors will be required to complete an 'Aboriginal Cultural Awareness and Heritage Discovery Management Induction' prior to commencing Project work. These sessions will be delivered by KYAC, and the Project heritage consultant.

## Riverlea Heritage Protection Agreement

The Applicant advises that it has committed to good faith negotiations for a Riverlea Heritage Protection Agreement, to apply for the life of the broader 'Riverlea Project' (25 years) between itself and KYAC.

This would see heritage management practices outlined in its CHMP revised to *"clarify, in the event of the discovery of ancestral remains, procedures relating to excavation, damage, disturbance or interference with the remains"*.

The Applicant advises that the *"revised CHMP will prioritise conservation of further discovered ancestral remains and outline the process for adopting alternatives to removal where possible (including redesign)"*. The Applicant also advises that the revised CHMP will also include *"reasonable agreed measures for ensuring cultural safety and spiritual wellbeing of Kurna heritage workers at Riverlea"*.

The Applicant has committed to a range of benefits for the Kurna People, including social and community benefits; a memorial, Kurna 'Keeping Place' for objects and cultural precinct at Riverlea Park; and a Resting Place for ancestors disturbed by Project works.

The Applicant advises that where the relocation and reburial of ancestors does occur, it would be to a location within Riverlea Park that *"respects cultural values of the Kurna people"*. Any proposed reburial location would be in open space, in proximity to the Gawler River (Kadlitparri), as close as possible to the existing burial location and away from any future potential disturbance. The location would be *"determined following consultation with Kurna people (including site visits) and agreed to between KYAC and the Applicant"*.

## PROJECT DETAILS

### Summary of Precinct 2 Project works

The development of Precinct 2 would provide approximately 2,740 residential allotments that would range in size and location. Retail and commercial precincts are also planned, as well as schools and sports facilities; open spaces and saltwater lakes, and storm water channels; supporting road networks and other infrastructure; services and other associated infrastructure. Original Application Area (North) would be designed around a series of saltwater lakes as indicated in the maps at Attachments 2 and 3. In addition, stormwater outflow works along Thompson Creek would be undertaken within Original Application Area (South).

### Proposed ground disturbing works

Key ground disturbing works associated with the Project include:

- Surface stripping of vegetation and topsoil over the Overall Application Areas, to an average depth of 150 mm
- excavation of saltwater lakes to approximately 3.5 to 4.0 m in depth, described as 'bulk earthworks'
- excavation within open drainage channels for the construction of a stormwater management system, which may vary in depth from 1.0 m down to 2.5 m in depth
- placement of fill material excavated from lakes and drainage channels over residential, retail, sports, and school precincts to an approximate average height of 1.5 m

- following this, service trenches would be excavated through the fill material to allow all services including sewer pipes, stormwater pipes, water supply pipes, electrical cables, communication cables and recycled water [systems](#) to be installed. These trenches would then be backfilled with imported quarry materials.

#### Management of floodwater pathways

Given the nature of the Gawler River (Kadlitparri) to flood in times of heavy rain, the Project has been designed to ensure that floodwater pathways are managed through a system of open drainage channels within the Overall Application Areas in combination with appropriate land contouring.

In addition, the Applicant advises that following the stripping back of topsoil from the Overall Application Areas, raised earthen platforms would be constructed in locations designated for residential allotments and other buildings. These platforms would ensure that these structures avoid inundation in the event that heavy rain causes the Gawler River (Kadlitparri) to flood. These platforms would be constructed to a height of between 0.5 to 3.0 m, depending on the land profile requirements across the Overall Application Areas, and other relevant factors.

#### Open spaces

Measures to minimise clearing of native vegetation within the Overall Application Areas would include retaining a 50 m wide buffer along the Gawler River (Kadlitparri) as woodland open space. In addition, three areas containing clusters of remnant trees would be retained for future nature reserves. The Applicant says that this will contribute towards open space, increasing the area's biodiversity.

#### Project implications for Aboriginal heritage

Where the stripping back of topsoil, or any other soil removal or ground disturbing works, exposes Aboriginal heritage, where it is not practical to retain in situ, the heritage would be removed and relocated in consultation with KYAC ([discussed](#) above). Where Aboriginal heritage is discovered in areas designated for open space reserves, it is possible that it may be protected and left undisturbed.

[The Applicant advises that while no impacts to CMTs are intended, there may be unavoidable impacts due to earthworks, underground services installation and pavement construction. Pruning of these trees may also be required. For this reason, the authorisations sought by the Applicant are sought to extend to all CMTs within the Overall Application Areas.](#)

#### Additional Project works (future precincts)

The Applicant has sought authorisations under the Act that extend to portions of future precincts that intersect the Original Application Areas ([North](#)) and ([South](#)) (see [Attachments 3, 4, 5 and 6](#)). If authorised, these future precincts would see additional residential allotments and other Project infrastructure developed across the [Overall Application Areas](#), in line with necessary development approvals. The Applicant advises that Project works associated with future precincts would be of a similar nature to those described above for Precinct 2.

Project works within the three Additional Application Areas

The Applicant advises that works proposed within the three Additional Application Areas would be of a similar nature to those described above for Precinct 2. However, in addition, the Applicant advises that the following may also be undertaken within the three Additional Application Areas:

**Additional Application Area 1** – Carrying out ground disturbing works to facilitate the construction, development, installation, and creation (where relevant) of: retail and commercial buildings and infrastructure; schools and associated infrastructure; sports fields; lakes; reserves; stormwater management systems, including ‘gross pollutant traps’ and ‘bio-filtration swales’; and services.

**Additional Application Area 2:** Carrying out ground disturbing works to facilitate the construction, development, installation, and creation (where relevant) of: landscaping; stormwater management systems, including ‘gross pollutant traps’ and ‘bio-filtration swales’; and services.

**Additional Application Area 3:** Carrying out ground disturbing works to facilitate the construction, development, installation and creation (where relevant) of: retail and commercial buildings and infrastructure; schools and associated infrastructure; under-croft carparking; stormwater harvesting tank installations; utilities and infrastructure required by service authorities, including pressure reducing valve enclosures and ‘electrical switching equipment’ buildings; reserves; stormwater management systems; and services.

Of the above activities proposed within the Additional Application Areas, the Applicant advises that ground disturbing works would be undertaken down to a maximum depth of 5m.

**Other approvals and consents**

An Environmental Impact Statement (EIS) has been prepared for the Project, updated in April 2023. A copy of the EIS document is available via a website link on AAR’s webpage.

As part of the EIS, the Applicant commissioned a range of specialist reports, including a flora and fauna management plan, traffic assessment and a stormwater management plan. The EIS also deals with the Applicant’s obligations under the Act, and other legislation including the *Native Vegetation Act 1991 (SA)*, the *Landscape South Australia Act 2019 (SA)* and relevant requirements under the *Environment Protection Act 1993 (SA)*.

**SCOPE OF AUTHORISATIONS SOUGHT**

The Applicant seeks that the authorisations extend to:

- itself
- its subsidiaries and related corporate entities
- ND&A
- RAWsa
- permitted assigns, employees, agents, consultants, contractors and sub-contractors of the above entities

- staff and students of any radiocarbon dating facility nominated or approved by the Applicant or KYAC to undertake further research and analysis in respect of Aboriginal heritage in the [Overall Authorisation Areas](#),

in each case where reasonably undertaking works in connection with the Project. If the authorisations sought are granted, the authorised activities would be permitted only to the extent reasonably necessary while constructing and maintaining the Project [and removing samples from the state and testing, as required](#).

## **SECTION 13 CONSULTATION**

Prior to considering whether to grant any authorisation under the Act, section 13 requires the Minister to take all reasonable steps to consult with the Committee, Traditional Owners and any other Aboriginal parties with an interest. The consultation period for this matter has been further extended.

### **Previous meetings**

On Monday 14 August 2023, as part of the Minister's section 13 consultation process, a consultation meeting was held at the Riverlea Sales and Discovery Centre, Riverlea Park, to discuss the Project. Fifty-three interested Aboriginal parties attended the consultation meeting.

In response to discussions held at the 14 August 2023 consultation meeting, KYAC arranged a community meeting to further discuss the Project. This KYAC-led community meeting was held on 7 October 2023, [and was attended by AAR](#). Further information about this community meeting can be obtained from KYAC, care of South Australian Native Title Services (SANTS). SANTS can be contacted on 8110 2800, or at Level 4, 345 King William Street, Adelaide.

### **Final consultation meeting for Traditional Owners and interested Aboriginal parties**

A final community consultation meeting will be held for Traditional Owners and any other Aboriginal people and organisations with an interest from **5.30 pm on Thursday 11 January 2024 at the Mawson Lakes Hotel, 10 Main Street, Mawson Lakes**. A light supper will be provided; **RSVPs are required for catering**. For more information, to RSVP to attend the community meeting or to lodge a verbal submission, please call (08) 8429 9401.

### **Invitation for submissions from interested Aboriginal parties**

Verbal and written submissions, [or amendments to existing submissions](#), are now invited from all interested Aboriginal parties. Consultees may make a submission to AAR in person, by phone, letter or email. Anyone in receipt of this consultation information pack is encouraged to share it with other Aboriginal parties who may have an interest in the [Project](#).

Electronic copies are available online at [www.agd.sa.gov.au/heritage-applications](http://www.agd.sa.gov.au/heritage-applications).

### **CONSULTATION HAS BEEN EXTENDED, AND NOW CLOSES ON THURSDAY 25 JANUARY 2024**

The Committee will consider all submissions [received](#) by the due date at its meeting in [February 2024](#).

Aboriginal people with an interest in this matter are encouraged to contact AAR to learn more about the application and to lodge a submission.



All consultation feedback and/or requests for further information should be provided to:

Mr Alex van Wessem  
Principal Project Officer (Heritage), AAR  
Mail: GPO Box 464, ADELAIDE SA 5001  
Email: [AAR.CIR@sa.gov.au](mailto:AAR.CIR@sa.gov.au)  
Telephone: (08) 8429 9401

When making a submission, consultees should consider and respond to at least the following key questions:

- 1. Should the authorisations sought by the Applicant be granted? Why or why not?**
- 2. If granted, what conditions, if any, should be put on them?**
- 3. Are there any other matters that the Minister should consider in this application?**

Unless otherwise requested, submissions will be forwarded to the Applicant for comment. Once the public consultation period has closed, consultee submissions and the Applicant's comments about them will be forwarded to the Committee, and the Committee's own views will then be sought.

AAR will collate all submissions, the Applicant's responses to them, the Committee's advice, and its own recommendations to the Minister to assist him to make a final decision about the application.

AAR is available to answer questions or provide further information about the application at any time prior to consultation closing on [Thursday 25 January 2024](#).

Thank you for taking the time to consider this document. AAR acknowledges that this is a difficult and sensitive matter. If you are an interested Aboriginal party, AAR strongly encourages you to make a submission about this application. If you have already provided a submission, you are welcome to update it.

AAR is available to assist people to record submissions if they have any difficulty in doing so.

**Attachments:**

Attachment 1: [Overall Application Areas and the Applicant's 'Riverlea Project Masterplan' area](#)

Attachment 2: Indicative depiction of Project works in the Overall Application Areas

Attachment 3: Updated Riverlea 'Concept Plan', provided by the Applicant

[Attachment 4: Overall Application Areas, Aboriginal heritage and HIMAs](#)

[Attachment 5: Original Application Area \(North\), Additional Application Areas, Aboriginal heritage and HIMAs](#)

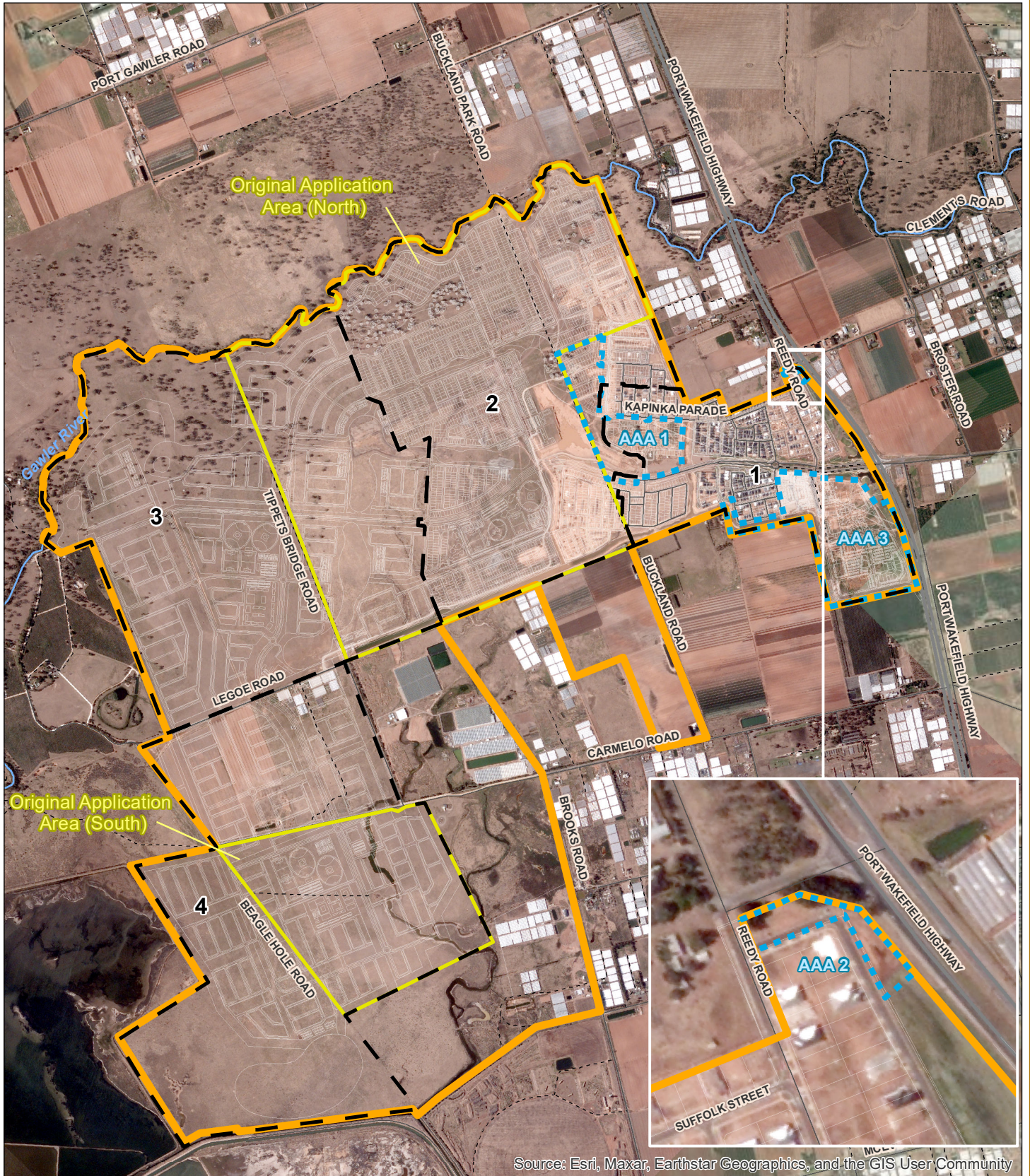
[Attachment 6: Original Application Area \(South\) and HIMA#3](#)

[Attachment 7: Proposed Aboriginal Heritage Management Measures](#)

[Attachment 8: List of acronyms and abbreviations](#)

[Attachment 9: Consultation Addendum \(22 December 2023\)](#)





Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



**Overall Application Areas**

- Original Application Areas
- Additional Application Areas (AAAs)

**Masterplan**

- Riverlea Project Masterplan
- Masterplan Riverlea Park
- Indicative Precinct Boundaries

**Roads**

- Highway
- Principal Road
- Secondary Road
- Minor Road

**Watercourse**

- River

**RIVERLEA PARK**



1:30,000



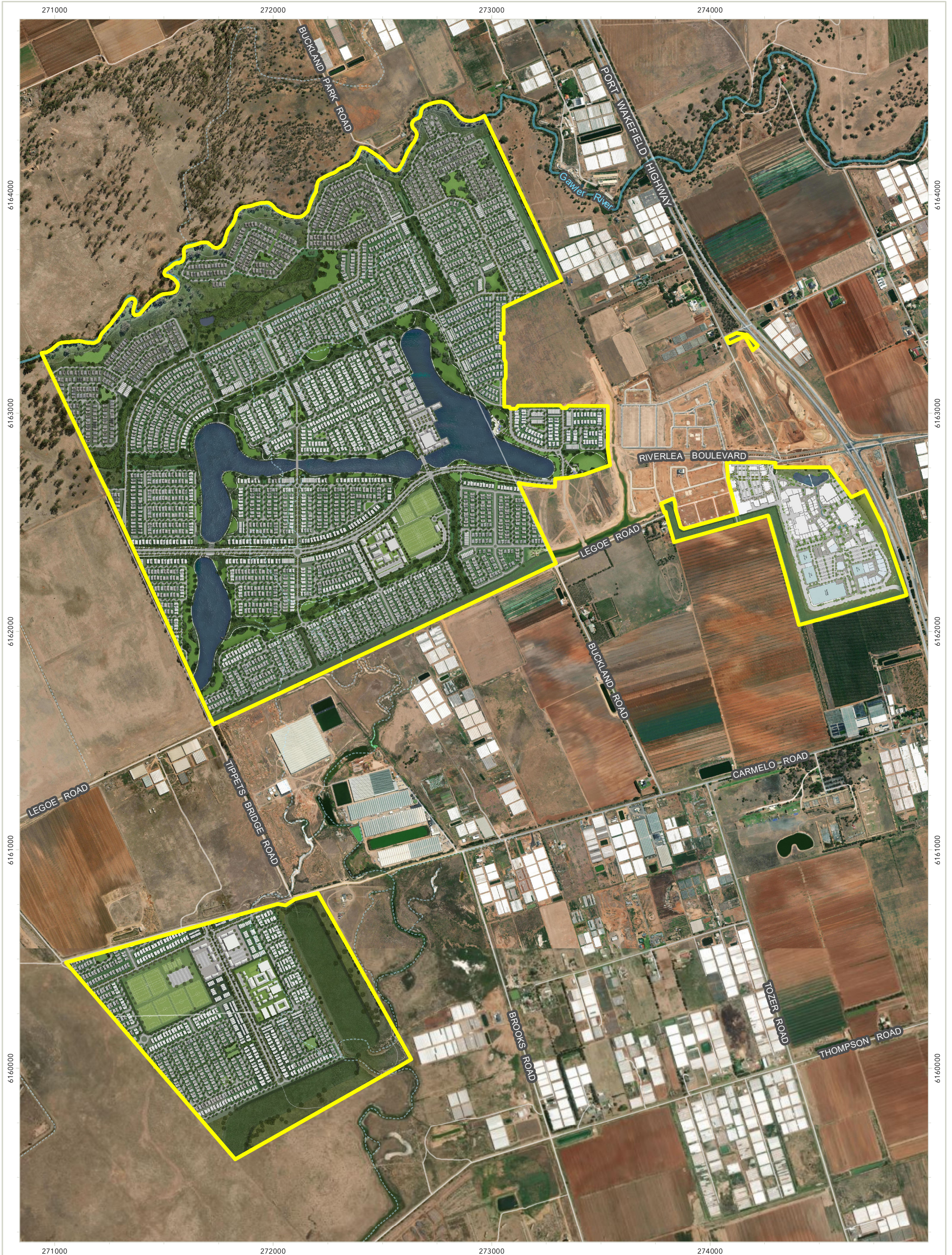
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Projection | Datum: Lambert Conformal Conic | GDA2020  
Job No: 2023144-001b\_V2  
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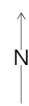




Legend  
 AHA Application Area

Horizontal Datum : GDA94  
 Map Projection : MGA94  
 Distance Units : Metres  
 Map Scale : 1 = 16,000

0 250 500  
Metres

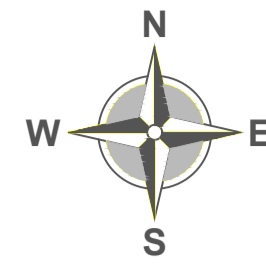


Walker Riverlea AHA Application

Application Area and Development Plan (April 2022)

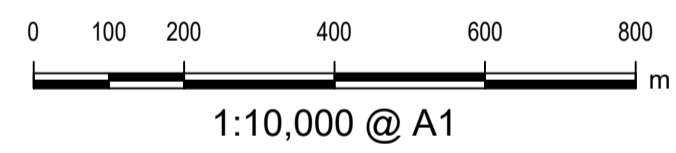
Source Document : WALK03 - AHA - Application Area and Development Plan  
 Published : Andrew Maland on 30/10/2023





**Legend**

- █ AHA Application Area
- █ Open Space
- █ Residential
- █ Employment
- █ Activity Centre
  
- 1** Precinct number
- █ Precinct boundary
- █ Distributor Road
- █ Collector A Road
- █ Collector B Road
- █ Collector C Road
- █ Neighbourhood Centre Collector Road
- █ Saltwater Lakes
- █ Channel / creek system
- █ Wetland
  
- EAC Emerging Activity Centre
- S&R Sports & Recreation
- E Education



Client



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Title

**Overall Concept Plan**

Project

**RIVERLEA**

Project Code	Drawing No.	Rev
21A3182	AHA - Concept Plan	Q

Revision Date

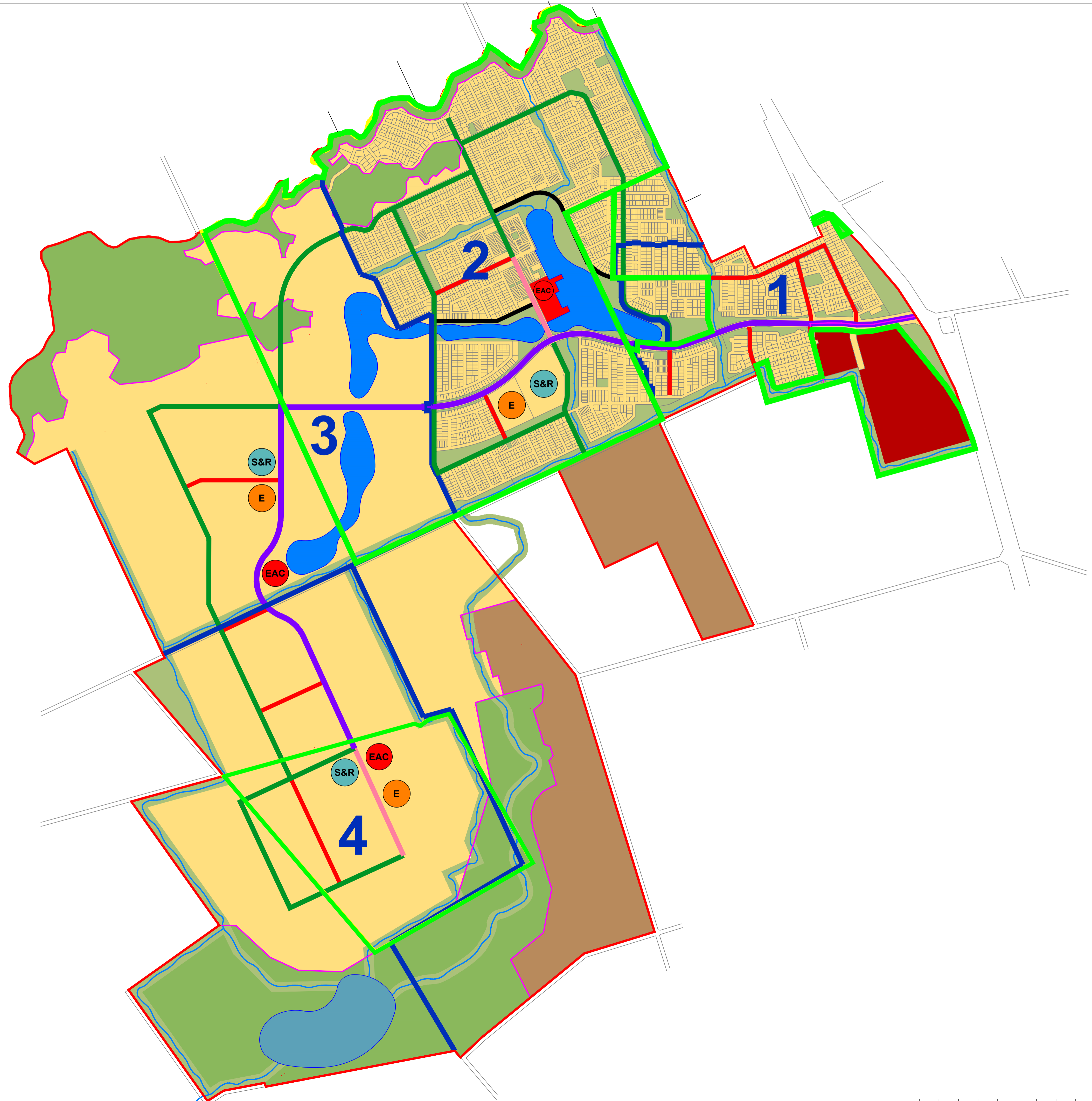
03 April 2023

Surveyor

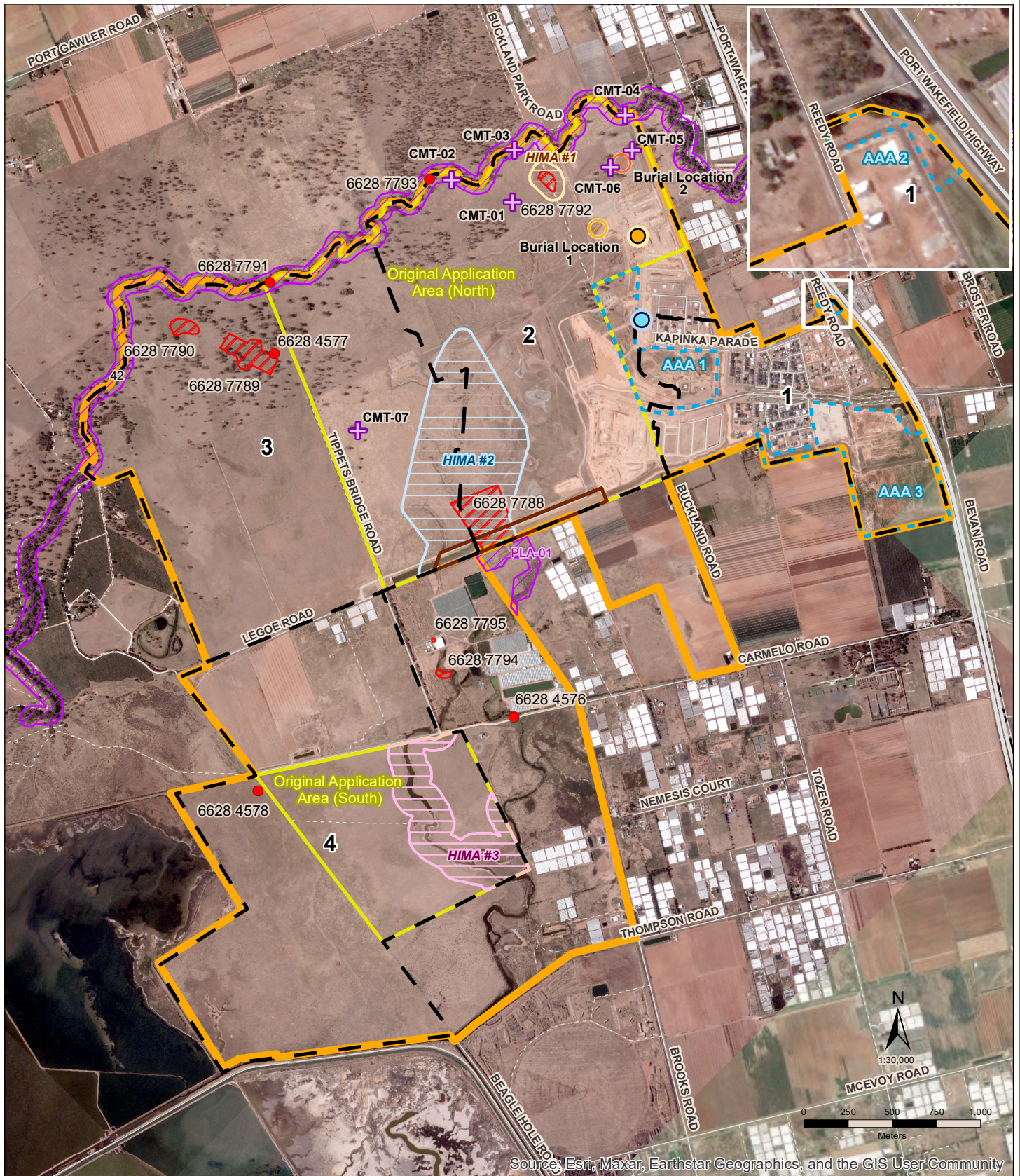
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 E adelaide@alexander.com.au







Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community



<p><b>AAR Heritage Sites</b></p> <ul style="list-style-type: none"> <li><span style="color: red;">●</span> Listed</li> <li><span style="border: 1px solid red; padding: 2px;"> </span> Listed</li> <li><span style="border: 1px dashed purple; padding: 2px;"> </span> Reported</li> <li><span style="color: purple;">+</span> Reported (Culturally Modified Tree)</li> </ul> <p><b>Burial Locations</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid orange; padding: 2px;"> </span> Burial Location 1</li> <li><span style="border: 1px solid red; padding: 2px;"> </span> Burial Location 2</li> </ul>	<p><b>Isolated Discovery:</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid blue; border-radius: 50%; padding: 2px;"> </span> 10 July 2023</li> <li><span style="border: 1px solid orange; border-radius: 50%; padding: 2px;"> </span> 21 September 2023</li> </ul> <p><b>Heritage Impact Mitigation Areas</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid yellow; padding: 2px;"> </span> HIMA #1</li> <li><span style="border: 1px solid blue; padding: 2px;"> </span> HIMA #2</li> <li><span style="border: 1px solid pink; padding: 2px;"> </span> HIMA #3</li> </ul>	<p><b>Overall Application Areas</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid yellow; padding: 2px;"> </span> Original Application Areas</li> <li><span style="border: 1px dashed blue; padding: 2px;"> </span> Additional Application Areas (AAAs)</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px solid orange; padding: 2px;"> </span> Riverlea Project Masterplan</li> <li><span style="border: 1px dashed black; padding: 2px;"> </span> Indicative Precinct Boundaries</li> <li><span style="border: 1px solid brown; padding: 2px;"> </span> Drainage Channel/Haul Road Corridor</li> </ul> <p><b>Roads</b></p> <ul style="list-style-type: none"> <li><span style="border-bottom: 1px solid grey; width: 20px; display: inline-block;"></span> Highway</li> <li><span style="border-bottom: 1px dashed grey; width: 20px; display: inline-block;"></span> Secondary Road</li> <li><span style="border-bottom: 1px dotted grey; width: 20px; display: inline-block;"></span> Minor Road</li> </ul>
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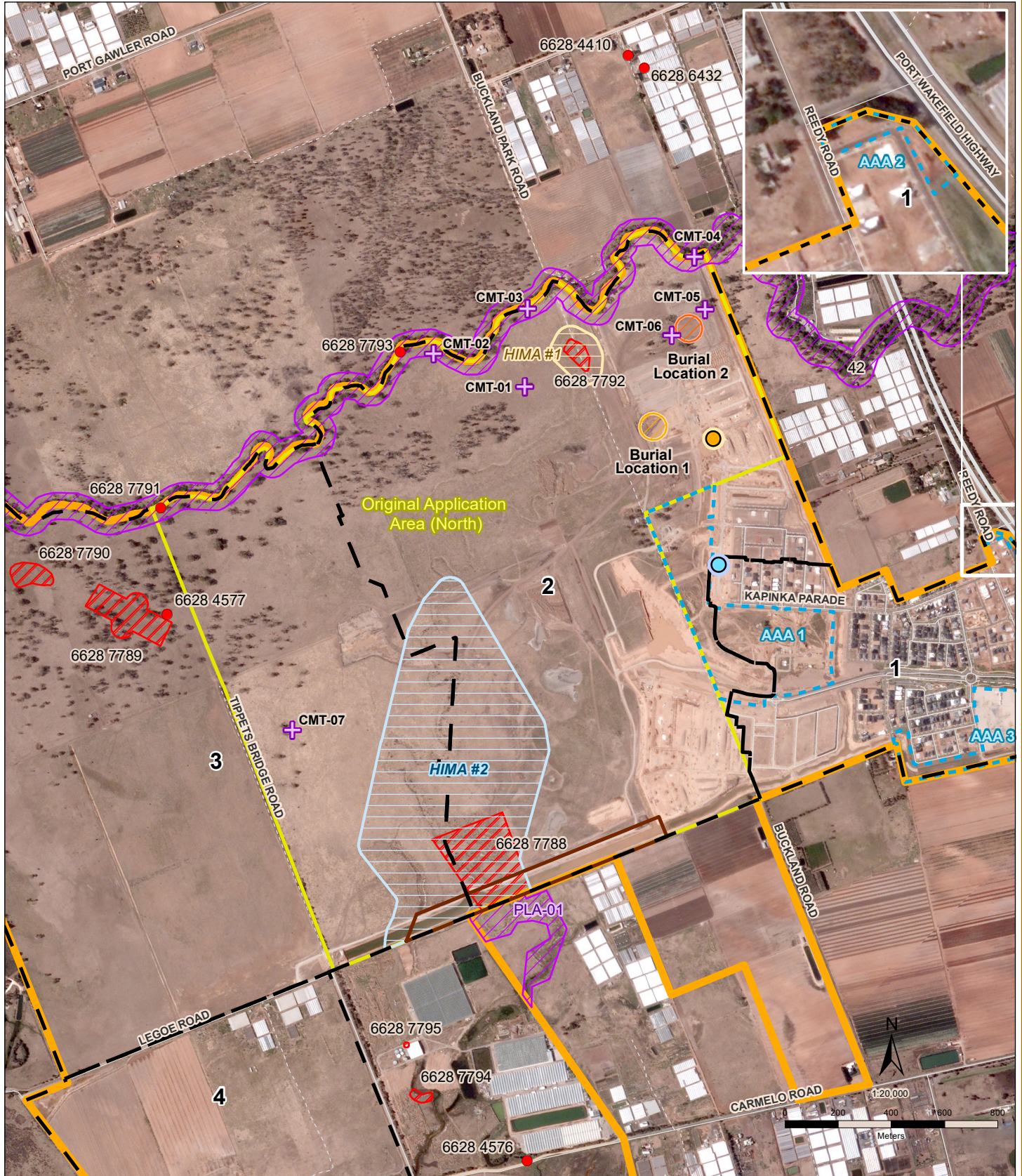
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Job No: 2023144-012\_V2  
Compiled: 4/12/2023

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<p><b>AAR Heritage Sites</b></p> <ul style="list-style-type: none"> <li>● Listed</li> <li>▨ Listed</li> <li>▭ Reported</li> <li>⊕ Reported (Culturally Modified Tree)</li> </ul> <p><b>Burial Locations</b></p> <ul style="list-style-type: none"> <li>○ Burial Location 1</li> <li>○ Burial Location 2</li> </ul>	<p><b>Isolated Discovery:</b></p> <ul style="list-style-type: none"> <li>○ 10 July 2023</li> <li>○ 21 September 2023</li> </ul> <p><b>Heritage Impact Mitigation Areas</b></p> <ul style="list-style-type: none"> <li>▭ HIMA #1</li> <li>▭ HIMA #2</li> </ul> <p><b>Overall Application Areas</b></p> <ul style="list-style-type: none"> <li>▭ Original Application Areas</li> <li>▭ Additional Application Areas (AAAs)</li> </ul>	<p><b>Other</b></p> <ul style="list-style-type: none"> <li>▭ Riverlea Project Masterplan</li> <li>▭ Indicative Precinct Boundaries</li> <li>▭ Drainage Channel/Haul Road Corridor</li> </ul> <p><b>Roads</b></p> <ul style="list-style-type: none"> <li>▬ Highway</li> <li>▬ Secondary Road</li> <li>▬ Minor Road</li> </ul>
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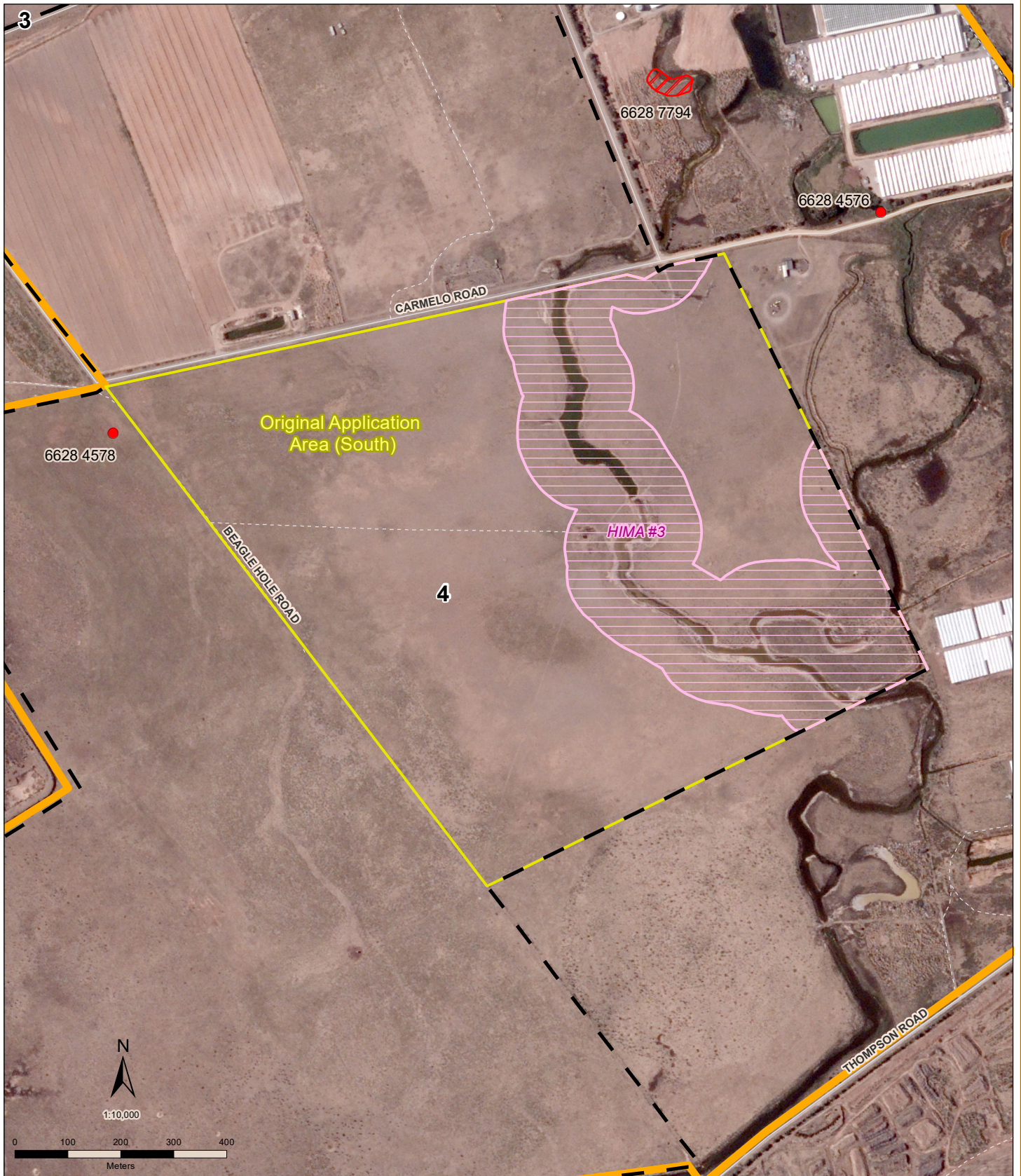
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Compiled: 4/12/2023

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**AAR Heritage Sites**

- Listed
- ▨ Listed

**Heritage Impact Mitigation Areas**

- ▭ HIMA #3

**Overall Application Areas**

- ▭ Original Application Areas

**Other**

- ▭ Riverlea Project Masterplan
- ▭ Indicative Precinct Boundaries

**Roads**

- Secondary Road
- - - Minor Road

Produced by: Aboriginal Affairs and Reconciliation (AAR)  
 Data sources: Aboriginal heritage - AAR  
 Topographic / cadastral - Location SA  
 Aerial imagery - BlackSky (Dec2023)  
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 Compiled: 4/12/2023

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**Attachment 7**

**Heritage Impact Mitigation Areas (HIMA)**

**HIMA#1**

HIMA#1 comprises site 6628-7792 and a 50 m radius around the recorded site boundary. The following heritage management measures are intended to be undertaken within HIMA#1:

- 1) locate, record and collect and surface archaeological evidence (including stone artefacts)
- 2) carry out a test trench program using a backhoe to expose the site's stratigraphy (layers) and contents to a maximum depth of 3 m or the to the level of basal clay, whichever is less, to be followed by hand or additional machine excavation for detailed recording of archaeological features. Then to be backfilled as necessary
- 3) if during this work, high density and high integrity archaeological features are identified, horizontal excavation using hand and/or machinery may be used to reveal and record the feature(s)
- 4) heritage monitoring of vegetation and topsoil stripping, sieving samples or entire areas where warranted, to identify any archaeological features
- 5) area is flagged in CHMP for further monitoring during Project construction works, as appropriate
- 6) where suitable opportunities exist, radiocarbon and OSL dating samples to be collected to better understand the 'Kurna archaeological record'.

**HIMA#2**

HIMA#2 comprises site 6628-7788, PAD 3, PAD 5, [48 archaeological features and other potential Aboriginal objects](#). The proposed methodologies to be carried out within HIMA#2 are identical to the steps outlined above for HIMA#1, apart from one additional measure that will be undertaken after step 1, but before step 2, which is to:

- 1) conduct archaeological excavations to salvage and record any exposed features identified within the HIMA, as appropriate.

**HIMA#3**

HIMA#3 comprises PAD 6. This area consists of a stormwater outflow along the western channel of Thompson Creek, that has been subject to historic erosion and cattle trampling. The following methodologies are recommended for this area:

- 1) Kurna heritage monitoring of any Project excavation activities
- 2) identification, recording and collection any artefacts on the surface HIMA#3, and any that are discovered during Project excavation works. Identification of any archaeological features encountered during Project excavations, and archaeological salvage where they cannot be avoided. Reporting of all discoveries to AAR
- 3) where suitable opportunities exist, radiocarbon and OSL dating samples to be collected to better understand the 'Kurna archaeological record'.

### Methodology for dealing with any archaeological discoveries

The 2023 ND&A report and Project CHMP together detail how discoveries of Aboriginal archaeological sites or objects will be managed. [The Project CHMP states that where a discovery is confirmed to be an Aboriginal heritage site or object, it will be reported to AAR.](#)

For discoveries of isolated artefacts that cannot be retained in situ, the following methodology will be followed:

- 1) locate, record and collect and surface archaeological evidence (including stone artefacts).

For discovered archaeological sites and features that cannot be retained in situ, the following methodology will be followed:

- 1) carry out a test trench program to a maximum depth of 3 metres or to the level of basal clay, whichever is less, using a backhoe to expose the site's stratigraphy (layers) and contents, to be followed by hand or additional machine excavation for detailed recording of archaeological features. Excavation to be backfilled as necessary
- 2) if during this work, high density and high integrity archaeological features are identified, horizontal excavation using hand and/or machinery may be used to reveal and record the feature(s)
- 3) heritage monitoring of vegetation and topsoil stripping, sieving samples or entire areas where warranted, to identify any archaeological features
- 4) area is flagged in CHMP for further monitoring during Project construction works, as appropriate
- 5) where suitable opportunities exist, radiocarbon and OSL dating samples to be collected to better understand the 'Kurna archaeological record'.

Where a 'major heritage discovery' is made, which includes archaeological sites and Aboriginal ancestral remains, a specific mitigation solution appropriate to the discovery will be developed. This will involve an on-site inspection, followed by a subsequent meeting attended by the Applicant, KYAC, and the Project heritage consultant to develop a strategy for dealing with the discovery. While the above 5 steps will be followed for archaeological sites, specific methodologies may also be implemented where considered appropriate (to be determined during the on-site inspection and subsequent meeting).

### Proposal to deal with discovered Aboriginal ancestral remains

Protocols dealing with the discovery of Aboriginal ancestral remains are also covered in the Project's CHMP. Specifically, where bones are discovered that are confirmed by the Project heritage consultant to be human remains, a 50m radius around the discovery location will be cordoned off and all Project activities cease within it until the following process is complete.

SAPOL will be notified, and a forensic examination of the discovery will be undertaken by SAPOL to confirm whether or not the remains are Aboriginal ancestral remains. AAR will also be notified of the discovery, and of the outcomes of SAPOL's assessment. Where the discovery is confirmed by SAPOL to be Aboriginal ancestral remains, the following steps will be undertaken:

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- 1) KYAC/RAWsa, the Applicant and the Project heritage consultant will meet on-site to consider whether the remains can be left in-situ and avoided, or whether the remains should be excavated and moved to a new location. AAR will be invited to attend any on-site meeting
- 2) where excavation is considered the most appropriate option, the remains will be recorded and recovered using archaeological excavation techniques. The remains will be stored safely, pending future reburial in a location to be identified in consultation with Kurna Traditional Owners
- 3) area is flagged in the CHMP for further monitoring during Project construction works, as appropriate
- 4) where suitable opportunities exist, radiocarbon and OSL dating samples may be collected to better understand the 'Kurna archaeological record'. Where suitable samples are available, and where permission is granted by Kurna Traditional Owners, samples (such as teeth) may also be collected for radiocarbon carbon dating, isotopic dietary analysis and DNA analysis to provide knowledge on the 'life histories' of the individuals
- 5) for any excavated remains, a suitable permanent reburial location will be identified in consultation with Kurna Traditional Owners and used for this purpose. Both the original and new burial location will be reported to AAR
- 6) following completion of the reburial of any remains, a report will be prepared by the Project heritage consultant in conjunction with KYAC/RAWsa documenting the excavation process, outcomes of any analysis, and the reburial process. This report will also be lodged with AAR.

### Post-salvage analysis, storage and reburial

The Applicant advises that all excavated Aboriginal sites, objects and remains will be subject to:

- 1) analysis, interpretation and recording in a report. This data will also contribute to the publication of the archaeological excavation results, including through co-authored publications with KYAC. This step would also include radiocarbon and OSL dating to provide a chronology for the archaeological materials recovered, as well as the results of any isotopic, radiocarbon and DNA sample analyses undertaken
- 2) recovered artefacts and other archaeological material will be housed in an appropriate location, pending cataloguing and analysis, and then relocated to a permanent keeping place, preferably within Adelaide's northern suburbs. The Applicant says it is committed to working with Kurna to facilitate the establishment of a keeping place, in consultation with AAR and relevant local councils.

### Management of culturally modified trees (CMTs)

The Applicant advises that while no impacts to CMTs are intended, there may be unavoidable impacts due to earthworks, underground services installation and pavement construction. Pruning of these trees may also be required. For this reason, the authorisations sought by the Applicant are sought to extend to all culturally modified trees within the Overall Application Areas.

## Attachment 8

## List of acronyms and abbreviations

AAR	Aboriginal Affairs and Reconciliation
ACHM	Australian Cultural Heritage Management Pty Ltd
Act	<i>Aboriginal Heritage Act 1988 (SA)</i>
Additional Application Areas	The additional areas that have been included as part of the application for authorisations under section 21, 23 and 29(1)(b) of the Act as shown on the maps at Attachments 1, 4 and 5 namely: <ul style="list-style-type: none"> <li>• Additional Application Area 1</li> <li>• Additional Application Area 2</li> <li>• Additional Application Area 3</li> </ul>
Applicant	Walker Buckland Park Developments Pty Ltd
Burial Location 1	The area shown on the maps at Attachments 4 and 5
Burial Location 2	The area shown on the maps at Attachments 4 and 5
CHMP	Cultural Heritage Management Plan
CMT	Culturally modified tree, also known as a 'scarred tree'
Committee	State Aboriginal Heritage Committee
EIS	Environmental Impact Statement
Heritage	Aboriginal sites, objects and remains as defined in the Act
HIMA	Heritage Impact Mitigation Area
HPZ	Heritage Protection Zone
KYAC	Kaurna Yerta Aboriginal Corporation RNTBC
ND&A	Neale Draper and Associates Pty Ltd
Original Application Areas	The areas that were the subject of the original application for authorisations under section 21, 23 and 29(1)(b) of the Act as shown on the maps at Attachments 1, 4, 5 and 6, namely: <ul style="list-style-type: none"> <li>• Original Application Area (North)</li> <li>• Original Application Area (South)</li> </ul>
Overall Application Areas	The entire areas that are currently the subject of the application for authorisations under section 21, 23 and 29(1)(b) of the Act as shown on the maps at Attachments 1, 4, 5 and 6, namely: <ul style="list-style-type: none"> <li>• Original Application Area (North)</li> <li>• Original Application Area (South)</li> <li>• Additional Application Area 1</li> <li>• Additional Application Area 2</li> <li>• Additional Application Area 3</li> </ul>
PAD	Potential archaeological deposit
Precincts 1 through 4	See maps at Attachments 1,3, 4, 5 and 6
Project	The development of residential housing, retail and commercial areas, schools, sports fields, lakes, reserves, stormwater management, and for the installation of services at Riverlea Park within the Overall Application Areas
'Riverlea Project Masterplan'	The Applicant's broader, long-term master planned 'Riverlea Project' development area as shown on the maps at Attachments 1, 3, 4, 5 and 6
RNTBC	Registered Native Title Body Corporate
SANTS	South Australian Native Title Services



If calling, please ask for: **Alex van Wessem**  
Telephone: **(08) 8429 9401**  
Document: **A1919973**

22 December 2023

**Aboriginal Affairs &  
Reconciliation**

Level 16  
30 Wakefield Street  
Adelaide SA 5000

GPO Box 464  
Adelaide SA 5001  
DX 336

Tel 08 7322 7057

Dear consultee

### **Consultation Addendum (22 December 2023) - Riverlea Park Development – Aboriginal Heritage Act**

The Minister for Aboriginal Affairs is currently consulting on an application for authorisations under sections 21, 23 and 29(1)(b) of the *Aboriginal Heritage Act 1988* (SA) (**Act**) from Walker Buckland Park Developments Pty Ltd (**Walker**).

Consultation materials relating to the application were last updated by Aboriginal Affairs and Reconciliation (AAR) on Friday 8 December 2023. Since then, further information has come to light that may be relevant to your consideration of this matter. This information, as well as further background information about the Aboriginal history of the region, is also provided in this letter. All terms used in this letter hold the same meaning as in AAR's consultation information pack (CIP), available at [www.agd.sa.gov.au/heritage-applications](http://www.agd.sa.gov.au/heritage-applications).

### **Aboriginal objects discovered in the 'Riverlea Project Masterplan' area**

AAR's 8 December 2023 CIP included information about some 421 potential Aboriginal objects discovered within the Walker's 'Riverlea Project Masterplan' area.

On 13 December 2023, AAR archaeologists conducted a preliminary assessment of the objects to confirm whether they are archaeological objects. This assessment was undertaken 'on-site', within the 'Riverlea Project Masterplan' area, in the presence of Kaurna cultural heritage officers. No objects were removed from the area.

AAR's preliminary assessment identified more objects than had been reported to AAR. A preliminary estimate indicated possibly 2000 or more objects in total. However, this estimate, and all estimates provided below, are preliminary only, and may not reflect the total number of objects present. AAR notes that no wooden objects or ancestral remains were observed during AAR's assessment.

Further information is provided below:



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### Drainage channel/haul road corridor

AAR's minimum count of objects retrieved from this area is 356. However, the total number may be higher. Of the 260 objects that have been physically assessed by AAR, only 14 were definitively assessed not to be Aboriginal archaeological objects. The remainder of the 260 objects that were assessed by AAR comprise ten quartz flakes, and flaked pieces including 'debitage' (a term used to describe small stone pieces that are produced as a by-product during stone tool manufacture). In addition to stone artefacts, AAR archaeologists observed charcoal, clay heat retainers and associated soil material.

### Burial Locations 1 and 2

In AAR's preliminary estimation, between 1000 to 2000 objects have been collected from these two areas. AAR notes that a detailed physical inspection of the objects was not possible during its 13 December 2023 assessment, and so this estimate was based only on the number of bags observed by AAR archaeologists. In addition to the bags of stone objects, AAR also observed associated faunal material (animal remains) and shell.

While no physical assessment of the objects from Burial Locations 1 and 2 has yet been conducted by AAR, AAR understands that the 24 objects from Burial Location 1 that have been assessed by ND&A to be Aboriginal objects mainly comprise quartz and quartzite artefacts, with a lesser portion of silcrete artefacts.

### Other areas within the 'Riverlea Project Masterplan' area

AAR also observed other bags containing potential Aboriginal objects collected from other parts of the 'Riverlea Project Masterplan' area. As the objects within these bags were not physically inspected, AAR is not yet able to provide an estimate on the nature or number of these objects. However, AAR notes that quartz and quartzite flakes are the most common artefact types found within the "Riverlea Project Masterplan" area. Given this, AAR considers it likely that objects collected from other parts of the 'Riverlea Project Masterplan' area would be of a similar type.

## **Additional Aboriginal Community consultation meeting**

AAR's 8 December 2023 CIP provides details for an Aboriginal Community consultation meeting to be held from 5:30 pm on Thursday 11 January 2024 at the Mawson Lakes Hotel, Mawson Lakes.

In response to requests from Aboriginal Community members, an additional meeting will be held from 10:30 am on Saturday 13 January 2024 at Tauondi Aboriginal Community College – Port Adelaide, 1 Lipson Street, Port Adelaide SA 5015.

A light supper will be provided at the 11 January 2024 meeting, and a light lunch will be provided at the 13 January 2024 meeting. If you would like to attend either or both meetings, please advise AAR via email or telephone, for catering purposes.

## Background heritage information relevant to the area

In response to queries from consultees for information about previous heritage studies in the area, AAR provides below a summary of relevant background information relating to the Riverlea Park area and surrounds. For further context, see AAR's CIP.

The 2008 ACHM report notes that "*the coastal strip west of Port Wakefield Road, between the alluvial and estuarine [environments], has been found to contain numerous mounds and other sites*". The report goes on to provide details about the large burial mound known as the 'Greenfields Mound Site', located some 21 km south of the 'Riverlea Project Masterplan' area. The term mound site is described below.

The 2013 ACHM report provides further background information on the historic land use of the region by Aboriginal people, both prior to and following contact. References to historic and literary sources in ACHM's 2013 report indicates the northern Adelaide plains, particularly around Buckland Park (now Riverlea Park), supported extensive Aboriginal occupation. AAR notes that this is evidenced by the high concentration of known Aboriginal sites in the area today.

ACHM's 2013 report references early literature and media sources, including an expedition conducted by Captain Charles Sturt in 1839 and articles in *The Advertiser* from the early 20<sup>th</sup> century. These describe the northern Adelaide plains as an area containing a high concentration of camping sites and mound sites, often found in proximity to water courses. Mounds and 'Aboriginal ovens' feature heavily in this literature, demonstrating ongoing and extensive occupation by Aboriginal people over hundreds or thousands of years. In this context, ACHM describes these sites as being distinctive artificial 'mounds' formed through the accumulation of occupation (i.e. camping and living) debris (i.e. objects/archaeology) and sometimes including ancestral burials, having accumulated over an extended period of time.

In its 2013 report, ACHM says of literature relating to the northern Adelaide plains:

*Such an overview identifies the region as having the potential to contain significant Aboriginal sites, of which several have been previously recorded adjacent to the current project area. This should not be surprising as the northern plains provided a variety of ecosystems and thus ample resources to sustain local communities.*

In addition to mound sites, the 2013 ACHM report also flags the potential for the general area to contain Aboriginal ancestral burials. The report goes on to provide information about burial sites found in Adelaide's northern suburbs between 1942 and 2011. In summary, the 2013 ACHM report says:

*The results of the background research presented in this section of the report suggest intense levels of Aboriginal occupation and cultural*

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*activity in and around the project area. Archaeological investigation in the area has the potential to provide further evidence of continual occupation and cultural activity within the area over thousands of years. There is also a distinct possibility of human remains being unearthed should ground disturbance works be undertaken within the Buckland Park mound sites.*

AAR notes at least one mound site is recorded west of the Overall Application Areas, but within the 'Riverlea Project Masterplan' area.

The 2013 ACHM report also provides information about previous heritage discoveries for which records are held by the South Australian Museum (SAM). A search using the term 'Buckland Park' yielded some 16 results, including the discovery of both archaeological objects and burials discovered between the 1930s and the late 1960s. It is not clear to AAR how many, if any, of these discoveries intersect the 'Riverlea Project Masterplan' area.

Lastly, AAR is aware of ancestral remains and mound sites recorded across the northern Adelaide suburbs, including the Buckland Park area, in the 1960s and 1990s. However, to AAR's knowledge none of these locations intersect with the 'Riverlea Project Masterplan' area.

Nonetheless, AAR notes that the information provided herein demonstrates that the 'Riverlea Project Masterplan' area intersects a highly sensitive heritage-rich landscape.

### **Consultation information**

As previously stated, AAR has extended its consultation period for this application until **Thursday 25 January 2024**. A copy of this letter, and an updated version of the CIP, is available at [www.agd.sa.gov.au/heritage-applications](http://www.agd.sa.gov.au/heritage-applications).

AAR is available to assist anyone who has any difficulty in recording a submission. If you would like to receive a hardcopy of this letter, or an updated version of AAR's CIP, please let AAR know.

Thank you for considering, and sharing your views about, this sensitive matter.

Yours sincerely  
**Aboriginal Heritage Team**  
**Aboriginal Affairs and Reconciliation**  
**Attorney-General's Department**