

CONSULTATION INFORMATION PACK

Deeper Maintenance and Modification Facility (DMMF) Project

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

- Applicant:** Urban Renewal Authority trading as Renewal SA
- Application Type:** Sections 21, 23 and 29(1)(b) of the *Aboriginal Heritage Act 1988 (SA)*
- Application Area:** An area of land 17.08 hectares in size immediately south of Womma Road, east of Heaslip Road, and north of the Royal Australian Air Force (RAAF) Base Edinburgh in Penfield (Figure 1 and Attachment 1).
- Proposed Activities:** Within the Application Area, the Project would involve excavations and other earthworks associated with the construction of four aircraft hangars, as well as warehouses, workshops, offices, storage facilities and pump stations; installation of infrastructure, roads, curbing, and services; and landscaping, including vegetation clearing. Works associated with the establishment of a temporary compound are also proposed by the Project.

Figure 1 – View looking southwest across the Application Area (image courtesy of the Applicant)



INTRODUCTION

The Minister for Aboriginal Affairs (Minister), 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 the Urban Renewal Authority trading as Renewal SA (Applicant). The Applicant seeks to construct a facility known as the Deeper Maintenance and Modification Facility (Facility) at Penfield, in Adelaide's northern suburbs, for the long-term maintenance and modification requirements of the Commonwealth Department of Defence's (Defence Force's) Boeing 737 aircraft fleet (Project). The Application Area is shown on the map at Attachment 1 bounded in red (Application Area).

The Project location was chosen because there is vacant land to the southwest of the Application Area, owned by the Commonwealth Government, which adjoins RAAF Base Edinburgh. A new direct tow way – a strip of tarmac used for towing aircraft – is proposed to be built on this vacant land, ultimately connecting the Application Area to RAAF Base Edinburgh. On completion, the Application Area would be leased to the Defence Force, which would operate the Facility.

Within the Application Area, the Project would involve ground-disturbing works associated with the construction of four aircraft hangars, as well as warehouses, workshops, offices, and associated infrastructure and services. Landscaping and vegetation clearing is also proposed as part of the Project, as well as various works required to establish a temporary compound.

The Application Area falls 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).

A cultural heritage survey of the Application Area was conducted by Neale Draper & Associates Pty Ltd (ND&A) and four Kurna representatives in April 2022. Six Aboriginal stone objects were identified (Table 1). These were reported to the Attorney-General's Department – Aboriginal Affairs and Reconciliation (AAR) by the Applicant.

Section 21 of the Act makes it an offence to excavate land to uncover Aboriginal sites, objects and remains (together, 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 relocating at least six known Aboriginal stone objects, and extensive ground-disturbing works that may damage, disturb, or interfere with Aboriginal heritage, the Applicant has sought authorisations under sections 21 and 23 of the Act. Authorisation under section 29(1)(b) has been sought to enable the Applicant to send archaeological samples interstate for radiocarbon analysis, if supported by Kurna Traditional Owners.

During the Project, Aboriginal heritage would be managed under a Kurna Cultural Heritage Management Plan (KCHMP) developed by ND&A in consultation with Kurna representatives,

KYAC, and the Applicant. Under the KCHMP, parts of the Application Area that are more likely to contain Aboriginal heritage would be subject to heritage monitoring.

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. 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.

A guide to acronyms and abbreviations used in this document is at Attachment 4.

The information in this consultation information pack is primarily based on information provided to AAR by the Applicant.

OVERVIEW

The Applicant

The Applicant is the state government's lead urban development agency, tasked to deliver state projects with a focus on the environment, community and the economy.

Project Background

On 19 February 2022, the Commonwealth Government announced that the Facility would be built directly north of RAAF Base Edinburgh by the state government and then leased to the Defence Force.

The Applicant has advised that the Commonwealth Government's vacant land, which would be used to connect the Facility to RAAF Base Edinburgh via an aircraft tow way, is not part of the Application Area. The works proposed on that land parcel are part of a separate project that will be subject to Commonwealth laws and requirements, primarily under the *Environment Protection and Biodiversity Conservation Act 1999* (Cwth).

Application Area

The Application Area is owned by the state government, except for a section of Commonwealth Government land (part of the land in Certificate of title Volume 5133 Folio 7), which is in the process of being transferred to the state government. The Application Area, which measures around 17.08 hectares in area, is bounded on its northern end by Womma Road, by Heaslip Road to the west, and RAAF Base Edinburgh to the south. The Application Area is located in Penfield, in Adelaide's northern suburbs (Attachment 1).

The Applicant advises that the Application Area *"has been used for cropping and rural horticulture, with a range of associated infrastructure, including dwellings, sheds, greenhouses, septic tanks, roads, a swimming pool, fencing, irrigation, and power lines over many years, causing a substantial ground disturbance."* The Applicant advises that former dwellings, sheds, greenhouses and structures within the Application Area have recently been removed.

The Applicant has chosen the Application Area for the Project because of the convenience in establishing a direct connection to RAAF Base Edinburgh.

PROJECT DETAILS

The Applicant advises the Project would involve the construction of four aircraft hangars, as well as associated warehouses, workshops, offices, and associated infrastructure and services. Landscaping and vegetation clearing is also proposed as part of the Project, as well as various works required to establish a temporary compound.

Given the scale of the Project, the Applicant anticipates the Facility to be completed in the second half of 2026.

An indicative Project layout is shown at Figure 2.

Project elements

Preparation works

The Applicant has advised that initial preparation of the Application Area would generally involve vegetation clearance, including trees and shrubs, followed by clearance of ground-level grasses. Topsoil would also be removed and stockpiled nearby for reuse in rehabilitating disturbed areas and for future landscaping.

For most of the Application Area, initial earthworks would involve 'conditioning' and compacting the existing ground surface, prior to filling with the removed topsoil and/or imported soil fill. This work is anticipated to impact the top 150mm of soil and would involve grading, wetting, and compacting with a roller. The current Project design has a stormwater swale drain excavated along the northern boundary of the Application Area, adjacent to Womma Road. Additional stormwater swales are proposed to continue along the west and eastern boundaries of the Application Area, varying from approximately 1m to 2.5m in depth. Soils excavated from these stormwater swales would be used for bulk filling of the location where the four hangars would be built, and for other associated construction works.

The Applicant advises that the maximum stormwater pipe depth is approximately 2.5m below ground surface.

Soil would be placed across the Application Area to level the ground as required. The location of the new hangars, hardstand area (aircraft apron) next to the new hangars, and the tow way would be filled up to approximately 1.5m above the current surface level. The height of filling is expected to decrease to less than 1m as work progresses towards the Application Area's southern boundary.

Temporary Project works

The Applicant advises that the establishment of a temporary compound would include a hardstand area containing sheds, toilets, crib huts, parking for employees (with vehicle access from local roads), and material delivery/unloading bays (for construction materials). Several options for the temporary compound are under consideration.

The temporary compound would be situated above the existing surface level, with fill material being brought in to elevate those areas that would be used by vehicles and machinery. Temporary fencing would be erected to secure the Application Area. It is anticipated that

fencing posts would be installed into excavated post holes of 0.6m diameter and approximately 1m depth. Any temporary signage would be installed into excavated post holes of 0.3m diameter and approximately 1m depth.

Narrow trenching (less than 0.6m width) would be required to establish temporary service connections, involving a maximum excavation depth of up to 0.8m below the existing surface level.

An office/workshop measuring approximately 198m x 28m (8.3m high) would also be constructed. Other ancillary infrastructure would be constructed as part of the temporary compound, including:

- A fire pump facility – measuring approximately 13m x 18m
- A 'Landside' storage facility – measuring approximately 8m x 37m
- an 'Airside' storage facility – measuring approximately 8m x 37m

The Applicant advises that, in the context of the Facility, 'Airside' refers to areas where aircraft may be present, and 'Landside' refers to all other parts of the Application Area where aircraft are not permitted.

It is anticipated that this work would be undertaken within two months of the commencement of Project preparation works. The Applicant advises that, once engaged, the principal contractor would be responsible for removal of all temporary works constructed and to rehabilitate any ground disturbance within any parts of the Application Area that are not intended to form part of any permanent Project works.

Permanent Project works

Following completion of preparation works and the establishment of temporary infrastructure, the construction of permanent Project works would commence.

This would first involve piling and concrete foundation works for the hangers and ancillary buildings, to be conducted alongside in-ground service installation and other civil and foundation works. Piling works for the buildings would be approximately 900mm in diameter, to depths ranging from 6.0m to 11.0m and would take approximately one month to complete.

Following the above work, initial Project excavation and filling works to enable construction of the hangar's footings, foundations and in-ground services would occur. The Applicant advises that this would take around six to nine months to complete. This would include excavations to create stormwater runoff swales and drains on the northern, eastern and western sides of the Application Area and placement of in-ground electrical, sewer, fire and water services.

Permanent fencing would also replace the temporary fencing constructed during the previous Project phase. Parking areas would be landscaped with trees and shrubs. Any piping used within landscaping of landside areas would be trenched to an approximate depth of 300mm.

Excavations for kerbing would be up to 450mm deep.

Key Project components

Hangars and office/workshop

The Applicant advises that the current design for the four hangars measures approximately 240m long x 60m wide x 25m high; however, as at the time of writing this document, final hangar dimensions are still to be finalised pending further detailed design work.

Noting that there would be 1.5m of fill above the existing ground surface level, ground disturbance for the hangar's construction would involve excavations as follows:

- hangar piles - maximum depth of 900mm diameter. Pile is 11m in length.
- hangar pile cap - maximum depth of pile cap is 1800mm - relative to below hangar structural supports only.
- hangar concrete pad - maximum depth of pad footing is 500mm.
- hangar concrete footing beam - maximum depth of footing beam is 700mm.
- hangar concrete slab: Maximum depth of slab is 400mm.

The Applicant advises that a 'pile cap' is a concrete structure built on top of a pile that transfers the load of the building on to the piles. A 'footing beam' is part of an in-ground structure that supports the weight of the building structure and/or the floor.

For the office/workshop that would be constructed – again noting 1.5m of fill above the existing ground surface level - ground disturbance would involve a maximum concrete footing beam depth of 700mm and slab depth of 200mm.

Ancillary structures and infrastructure

For other structures and infrastructure, ground disturbance for their construction would involve:

- storage facilities - 200mm thick slab with 400mm deep edge beams.
- fire pump facility- 200mm deep slab with 650mm deep components. Fire water service installed at a typical depth of 750mm with mains connection off Womma Road. Fire tanks would be above ground on a slab adjacent to the fire pump facility.
- two sewer pump stations – depth of excavation approximately 4.5 m below final surface level (each approximately measuring 2m in diameter). Associated gravity sewers would be excavated to a depth of up to 2.5m from final surface level.
- one stormwater pump station (within an excavated swale) – depth of excavation approximately 5.5m below final level of swale drain (approximately 3m diameter hole).
- footings for light pole(s) / security camera mounting pole(s) – depth of excavation approximately 6m below final surface level (0.6m diameter hole).

Aircraft pavements for the tow way and the concrete apron areas adjacent to the hangars would be constructed concurrent with the hangars and the internal building fit out works (i.e., walls, ceiling, lights, air-conditioning etc) in the Application Area, with the ground surface filled up to approximately 1.5m above the existing level.

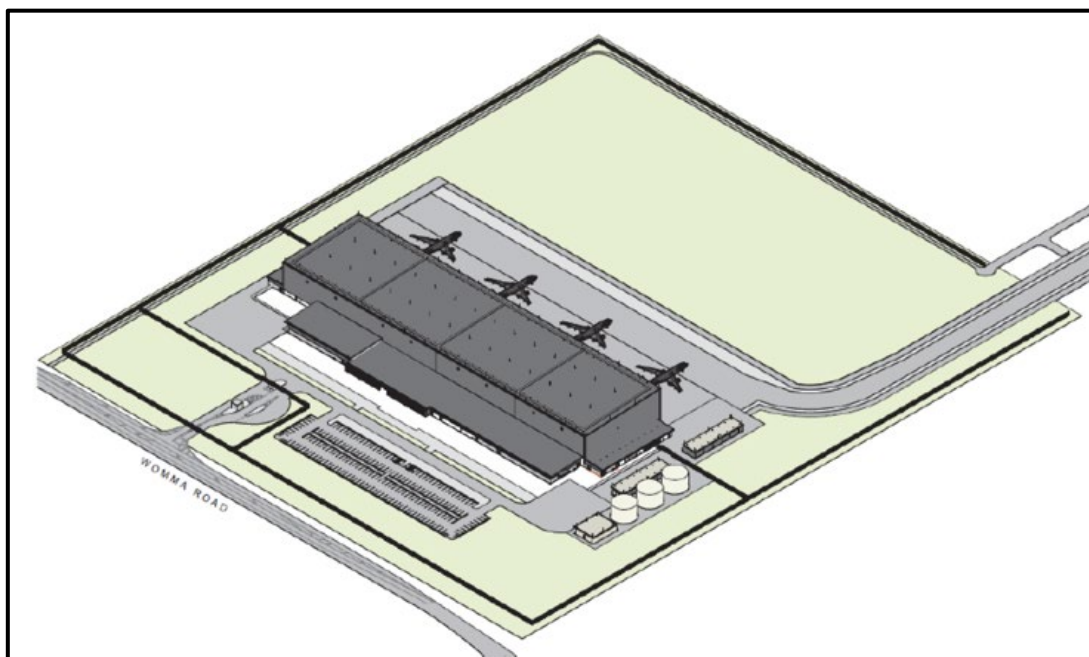
Utility excavation depths for other in-ground services would be as follows:

- high voltage electrical typically - installed in trenches around 1m deep.
- low voltage electrical and communications - typically installed in trenches around 600mm deep.
- potable water supply and reticulation – typically 450 – 600mm in depth.
- telecommunications – installed at a depth of 0.6m from the final surface level.

Anticipated Project benefits

The Applicant advises that the Project would be a “major defence industry facility that will provide an important sovereign capability” in that the maintenance and modification of Boeing 737 variants can occur within Australia. It also advises that the Project would be a “key piece of infrastructure that further expands the state’s defence focus, increases employment opportunities within the state, and aligns with the Commonwealth’s Defence strategic objectives”.

Figure 2 – Artist’s impression of the Facility – Application Area shaded in mint green facing southeast (image courtesy of the Applicant)



The Applicant advises that the Project “is expected to deliver 450 full-time jobs per year during construction and up to 185 new long-term, highly skilled defence industry jobs, including roles in advanced aircraft maintenance, engineering, avionics, and logistics”. In addition, the Applicant expects the Project to support the development, and increase the viability of, existing service industries, and potentially be a catalyst for other aerospace projects in the future.

Project flexibility

The Applicant advises that while final layout design of the Project will be subject to further refinement as construction details are finalised, the Project would generally be consistent with how it is described in this document. AAR understands that the exact scope of Project works,

including the extent, location and depth of excavations, footings and services that may be required to construct the Project, will be refined as the Project design progresses.

Given the current stage of planning for the Project, the Applicant advises that the location of specific activities should be considered preliminary. These may be subject to change, as the final design of the Project is finalised.

Figure 2 (above) has been prepared to provide a graphical representation of what is currently proposed for the Project.

ABORIGINAL ENGAGEMENT

The Applicant advises that it is working and consulting with Kurna representatives on the Project. The Applicant has sought endorsement for the Project from KYAC and advises that it is in regular discussion with RAWsa (KYAC's nominated heritage management service provider) about the Project. The Applicant has sent the draft KCHMP to the KYAC Board for review.

In addition to the recent engagement outlined above, KYAC, RAWsa and four Kurna representatives participated in a heritage survey conducted in 2022 (discussed below).

KNOWN HERITAGE AND ASSESSMENTS COMMISSIONED BY THE APPLICANT

The Applicant has commissioned an Aboriginal heritage assessment over the Application Area for the Project.

Renewal SA DMMF Edinburgh Project – Kurna Cultural Heritage Assessment Report – December 2023

In 2022, KBR (engineering consultants for the Applicant) engaged ND&A on behalf of the Applicant to conduct a cultural heritage assessment of the Application Area. The assessment was conducted on 11 and 12 April 2022, and involved four Kurna representatives. The heritage consultants also conducted background research concerning land-use history and previous cultural heritage found in the broader local region.

This on-ground assessment also included part of a tow way located on the northern edge of the Defence Force's vacant land that is part of RAAF Base Edinburgh, outside of the Application Area.

As a result of this assessment, six stone artefacts were recorded in the Application Area (Table 1 and Attachment 2). The finds included quartz and silcrete flaked stone artefacts (cutting tools), grindstones, and hammer-stones and anvils made from quartzite beach cobbles (all broken or scarred by plough blades). Four of the finds occurred close to each other in a recently ploughed area, possibly indicating the presence of a potential archaeological deposit (PAD) below the surface. This PAD is depicted on Attachment 2 (note: it is not depicted on Attachment 1).

ND&A's on-ground survey observed that the Application Area is in a disturbed state. Ground surface visibility during the assessment was mostly poor, due to vegetation cover, existing buildings and greenhouses, large numbers of motor vehicles and machinery, with the exception of scattered areas that had been recently excavated or ploughed.

Table 1 – Aboriginal heritage identified within Application Area – descriptions provided verbatim from ND&A’s report

Number	Description	Status
KBR IF-01	Broken piece, quartzite cobble grindstone, burnt	Reported
KBR IF-02	Small (2 x 3cm) quartz bipolar core/segment	Reported
KBR IF-03	Quartzite cobble grindstone/pitted anvil	Reported
KBR IF-04	Battered quartz ‘spheroid’	Reported
KBR IF-05	Quartz bipolar core	Reported
KBR IF-06	Broken Quartz bipolar flake	Reported
KBR IF-08*	Quartz bipolar multi-directional core	Reported

*Note the ND&A report states that, “there is no IF-07 in this series of artefacts.”

Aboriginal heritage within 5 km of the Application Area

Beyond the six Aboriginal objects that have been reported to AAR, AAR holds no other records for Aboriginal heritage within the Application Area. However, it is possible that unrecorded Aboriginal heritage exists within the Application Area.

Within five kilometres of the Application Area, AAR is aware of seven Aboriginal sites. These comprise two Aboriginal burials, one grinding stone, two quartzite flakes, one quartzite flake, one mudstone flake and one silcrete core. None of these Aboriginal sites intersect the Application Area, but are mentioned here to provide consultees with contextual information about the kinds of heritage that may exist in the general vicinity of the Application Area.

OTHER RELEVANT ASSESSMENTS COMMISSIONED BY THE APPLICANT

Edinburgh Defence Precinct, Heritage Management Plan (draft v.5) 2020

It is important to note that a separate heritage management plan, the ‘Edinburgh Defence Precinct – Heritage Management Plan (EDP HMP)’, applies to the vacant Commonwealth Government land immediately south of the Application Area. The EDP HMP covers work to be undertaken on that land which would ultimately link the Facility with RAAF Base Edinburgh. The EDP HMP uses a project-specific archaeological zoning plan (PSAZP) that has been adapted by ND&A in the KCHMP. This is discussed further below.

AAR notes that the KCHMP, and not the EDP HMP, applies to the Application Area.

Edinburgh Deep Level Maintenance & Modification Facility, Edinburgh Parks, SA, Geotechnical Investigation Report 2022

The Applicant engaged CMWGeosciences (CMW) to conduct a geotechnical investigation of the Application Area in April and June 2022. This involved sampling of the soil profiles across the Application Area to determine their composition and level of strength (compression). Although this was primarily undertaken to assist in the Project’s construction planning, the resultant information was also used by ND&A in consultation with Kurna to help develop the PSAZP component of the KCHMP.

KAURNA CULTURAL HERITAGE MANAGEMENT PLAN (KCHMP)

The Applicant considers there may be a potential risk of encountering subsurface Aboriginal heritage during Project works. This is based on the cultural heritage survey, the known cultural heritage of the broader local area (based on Kurna knowledge and central archives information), and ND&A's review of CMW's 2022 geotechnical investigation report. Given this, the Applicant proposes to implement measures aimed at avoiding impacts to Aboriginal heritage throughout the Project works. These key measures are outlined in the Project KCHMP.

Kurna Cultural Heritage Management Plan (KCHMP) details

In conjunction with ND&A, the Applicant has developed a KCHMP, that provides a framework for managing any discovery of Aboriginal heritage throughout the life of the Project. The KCHMP is described as a 'live' document and will be updated in consultation with KYAC, RAWsa and the future principal contractor (as the types of works required and in which areas of the Application Area are progressively clarified). The KCHMP will also take into account any conditions imposed by the Minister if he chooses to grant the authorisations sought by the Applicant.

Broadly, the KCHMP seeks to:

- implement procedures to manage Aboriginal heritage discoveries
- provide best-practice measures for mitigating impacts to any heritage discovered during the Project, including through the salvage (that is, relocation) of heritage as necessary – see 'Proposed Heritage Management Methodology' section below
- in regard to Aboriginal remains specifically, ensure compliance with legal requirements and, where required, implement culturally appropriate measures for the relocation of ancestral remains where they cannot be avoided by Project works
- designate activities and areas where Kurna heritage monitors would be engaged to observe Project works. For example, continuous monitoring would occur in areas that have a high 'Risk Level' (see below), as well as within 10m of any discovered Aboriginal object or 'small archaeological site', and within 50m of any discovered Aboriginal remains.
- sieving of excavated sediments associated with heritage discoveries.

Project-specific archaeological zoning plan (PSAZP)

Using soil analysis from the geotechnical investigations, knowledge of proximity to known heritage sites, and consideration of landscape features that are more likely to contain heritage, the KCHMP categorises areas within the Application Area as having 'high,' 'medium,' or 'low' archaeological sensitivity across the Application Area. In turn, the KCHMP compares this sensitivity matrix to the anticipated impact of various proposed construction activities (such as, bulk earthworks, trenching etc), to calculate an overall Works Program Heritage Risk, or 'Risk Level,' for each area. This is done to ensure heritage monitoring and other measures are allocated to areas with the highest predicted heritage sensitivity. ND&A advises that, *"this approach has been used successfully for a number of Kurna cultural heritage management projects in the past."*

Table 2 below summarises the mitigation actions that are proposed for each Risk Level.

Table 2 – Proposed mitigation actions per Risk Level, based on the KCHMP and advice from the Applicant

Risk Level	Mitigation Actions
High	Surface inspection prior to activity Periodic inspections of activity/continuous monitoring of activity as required Sample sieving as required (due to heritage discovery) Heritage discovery training for excavation equipment operators and work crew
Moderate	Surface inspection prior to activity Periodic inspections of activity Sample sieving as required (due to heritage discovery) Heritage discovery training for excavation equipment operators and work crew
Low	Surface inspection prior to activity Sample sieving as required (due to heritage discovery) Heritage discovery training for excavation equipment operators and work crew

The map at Attachment 3 depicts the assessed Risk Levels across the Application Area.

Other relevant KCHMP provisions

Other heritage management measures include ensuring that:

- the principal contractor is responsible for implementing the KCHMP in liaison with KYAC
- all contractors and workers have inductions addressing culturally and legally appropriate Aboriginal heritage management processes
- an archaeologist is kept on-call to assist Kurna monitors with cultural heritage management on-site, and for day-to-day planning as required.

PROPOSED HERITAGE DISCOVERY MANAGEMENT METHODOLOGY

The Applicant’s KCHMP includes a copy of AAR’s Aboriginal Heritage Discovery Protocols and AAR’s Heritage Impact Procedure.

Where compliance is required by Ministerial authorisation, AAR’s Aboriginal Heritage Discovery Protocols outline the steps that must be followed in the event Aboriginal heritage is discovered during Project works. AAR’s Heritage Impact Procedure is a document aimed to assist proponents’ holding ministerial authorisations under the Act to prepare their own approach to avoiding or, where avoidance is not possible, excavating and removing discovered heritage. AAR’s Aboriginal Heritage Discovery Protocols make it a requirement that proponents’ holding an authorisation under the Act consider AAR’s Heritage Impact Procedures before deciding how to manage discovered heritage. The Applicant has committed to following both in the event of a heritage discovery during Project works.

Visit agd.sa.gov.au/heritage-applications for a digital copy of the AAR’s Aboriginal Heritage Discovery Protocols and Heritage Impact Procedure. If you would like a hardcopy version of these documents posted to you, please contact AAR (contact details below).

In addition to compliance with AAR’s Aboriginal Heritage Discovery Protocols, the KCHMP also outlines additional measures that would be enacted following the discovery of “*potential archaeological artefacts, features, or human skeletal remains*”. In the first instance the KCHMP

notes that, “*the most effective method for mitigating heritage discoveries is to discontinue disturbance activities at that location*”. However, where this is not possible, “*archaeological salvage and detailed recording of the site or burial...may be required,*” and so the below measures would be employed:

- immediate reporting of the discovery to the site manager, principal contractor, KYAC/RAWsa and the Project archaeologist
- implementing an immediate ‘stop works’ zone within 10m of an artefact and within 50m of skeletal remains
- secure the discovery from further disturbance
- record location and discovery circumstances (including photos with scale)
- assessment by Project archaeologist/KYAC/RAWsa
- if the discovery is confirmed not to be Aboriginal heritage, work can resume (Project archaeologist to record this outcome)
- if the discovery is confirmed to be Aboriginal heritage, AAR will be informed. If remains are discovered, SAPOL will also be contacted. In this case, the location will be secured for forensic examination.
- in the case of discovered archaeological objects and features, the Project archaeologist and KYAC/RAWsa will record, report and salvage (that is, relocate) archaeological objects and features according to any Ministerial authorisation and any other guidelines of the KCHMP
- in the case of an archaeological site or burial (as opposed to archaeological objects or features) a site inspection by the Project archaeologist, KYAC/RAWsa and principal contractor will occur to determine the “appropriate mitigation response.”
- for Aboriginal remains in particular, consideration will be given to whether the remains can be reburied in-situ and protected. If not, the remains will be recorded and recovered (that is, relocated) by the Project archaeologist/KYAC/RAWsa and stored pending future reburial. A report containing the burial site records and reburial details will be provided to AAR
- in each case scenario, work may only resume once the Aboriginal heritage has been managed in accordance with these processes and associated reporting requirements.

Where there are discrepancies between the measures proposed in the KCHMP and AAR’s Aboriginal Heritage Discovery Protocols, the latter would prevail.

SCOPE OF AUTHORISATIONS SOUGHT

The Applicant seeks that the authorisations extend to:

- itself and any related body corporate
- Defence Force
- ND&A
- RAWsa
- permitted assigns, employees, agents, consultants, contractors, and sub-contractors of the above,

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 Facility.

The authorisations are also sought to cover:

- those persons or entities to whom the Applicant sells, transfers, or assigns the whole or part of the Application Area, and
- any employees and students of any radiocarbon dating facility engaged to undertake research and analysis in respect of Aboriginal heritage from the Application Area.

Duration of authorisations sought

The Applicant has sought the authorisations, if granted, to be valid for the life of the Project, including future repairs and maintenance of the Facility.

SECTION 13 CONSULTATION

Prior to considering whether to grant any authorisations 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 that he considers may have an interest in the matter.

Invitation for submissions from interested Aboriginal parties

Verbal and written 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 also have an interest in the Application Area or the Project.

Electronic copies are available online at agd.sa.gov.au/heritage-applications.

An Aboriginal Community consultation meeting about the application will be held for Traditional Owners and other interested Aboriginal parties starting at **10:00 am on Friday 12 April 2024 at Tauondi Aboriginal College located on 1 Lipson Street, Port Adelaide SA 5015.**

A light lunch will be provided for meeting attendees; RSVPs are required for catering purposes.

For more information, to RSVP to attend the Community meeting, or to lodge a verbal submission, please call (08) 7424 6674 or email at AAR.CIR@sa.gov.au.

CONSULTATION CLOSES ON FRIDAY 26 APRIL 2024

The Committee will consider all submissions received by the due date.

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

All consultation feedback, submissions and/or requests for further information should be addressed to:

Dr Stephen Muller
Senior Project Officer (Heritage), AAR
Mail: GPO Box 464, ADELAIDE SA 5001
Telephone: (08) 7424 6674
Email: AAR.CIR@sa.gov.au

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

- 1. Should the authorisations sought be granted to the Applicant? Why or why not?**
- 2. If the authorisations are granted, what conditions, if any, should be imposed on them?**
- 3. Will the Project provide you with any direct or indirect benefits (e.g., cultural, financial or personal)?**
- 4. Are there any other matters the Minister should consider when deciding this application?**

Consultees may request that AAR keep any cultural information in their submission confidential. These requests will be facilitated, where possible, in line with procedural fairness principles. Otherwise, submissions in full will be forwarded to the Applicant for comment. Once the public consultation 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.

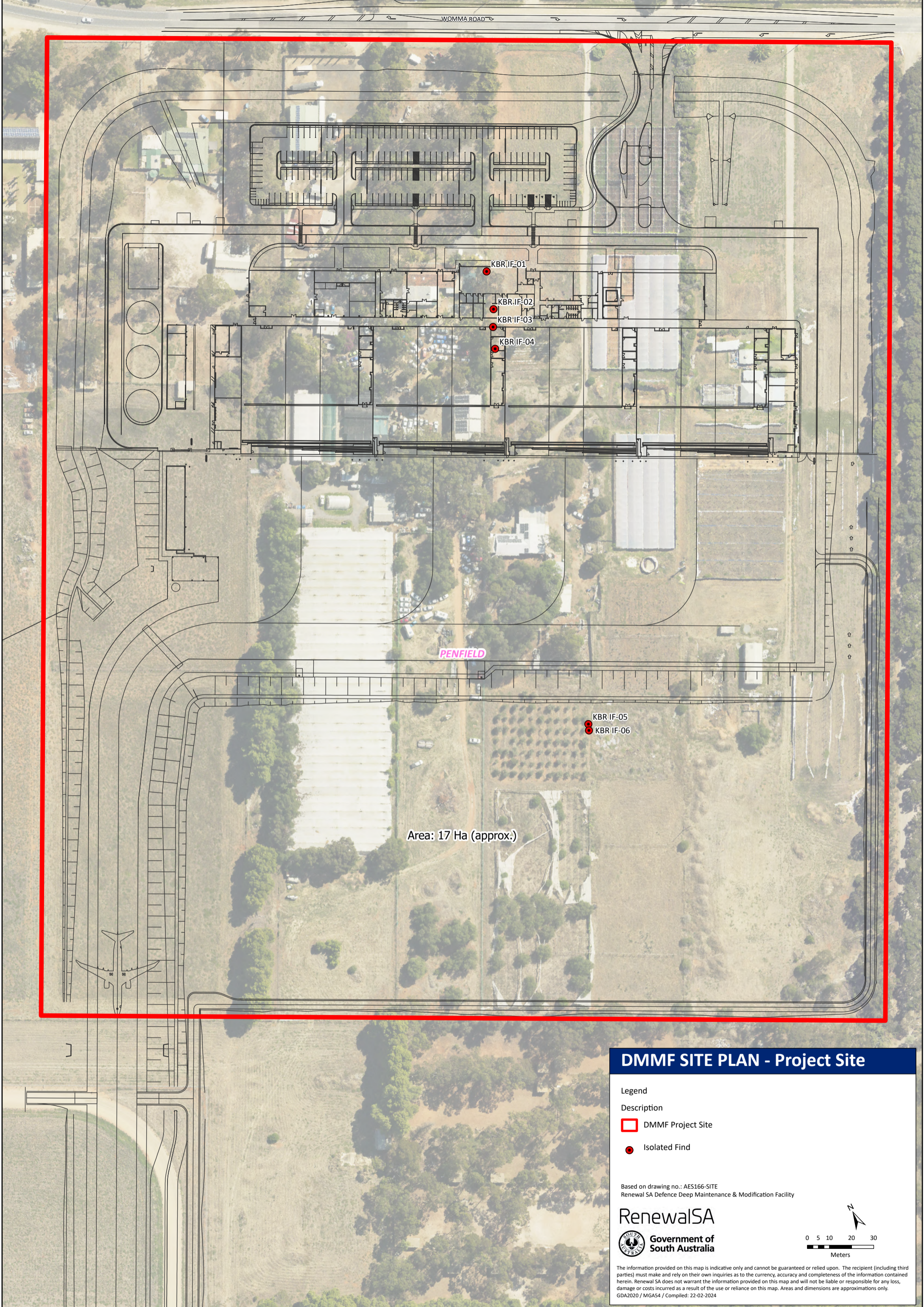
AAR is available to answer questions or provide information about the Project at any time prior to consultation closing on Friday 26 April 2024.

Thank you for taking the time to consider this application. If you are an interested Aboriginal party, AAR encourages you to make a submission about the Project.

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

Attachments:

- Attachment 1: Application Area for the Applicant's DMMF Project
- Attachment 2: Application Area in relation to known Aboriginal heritage
- Attachment 3: Archaeological sensitivity within Application Area
- Attachment 4: Acronyms and abbreviations



PENFIELD

Area: 17 Ha (approx.)

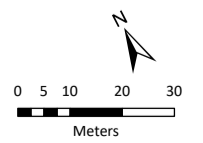
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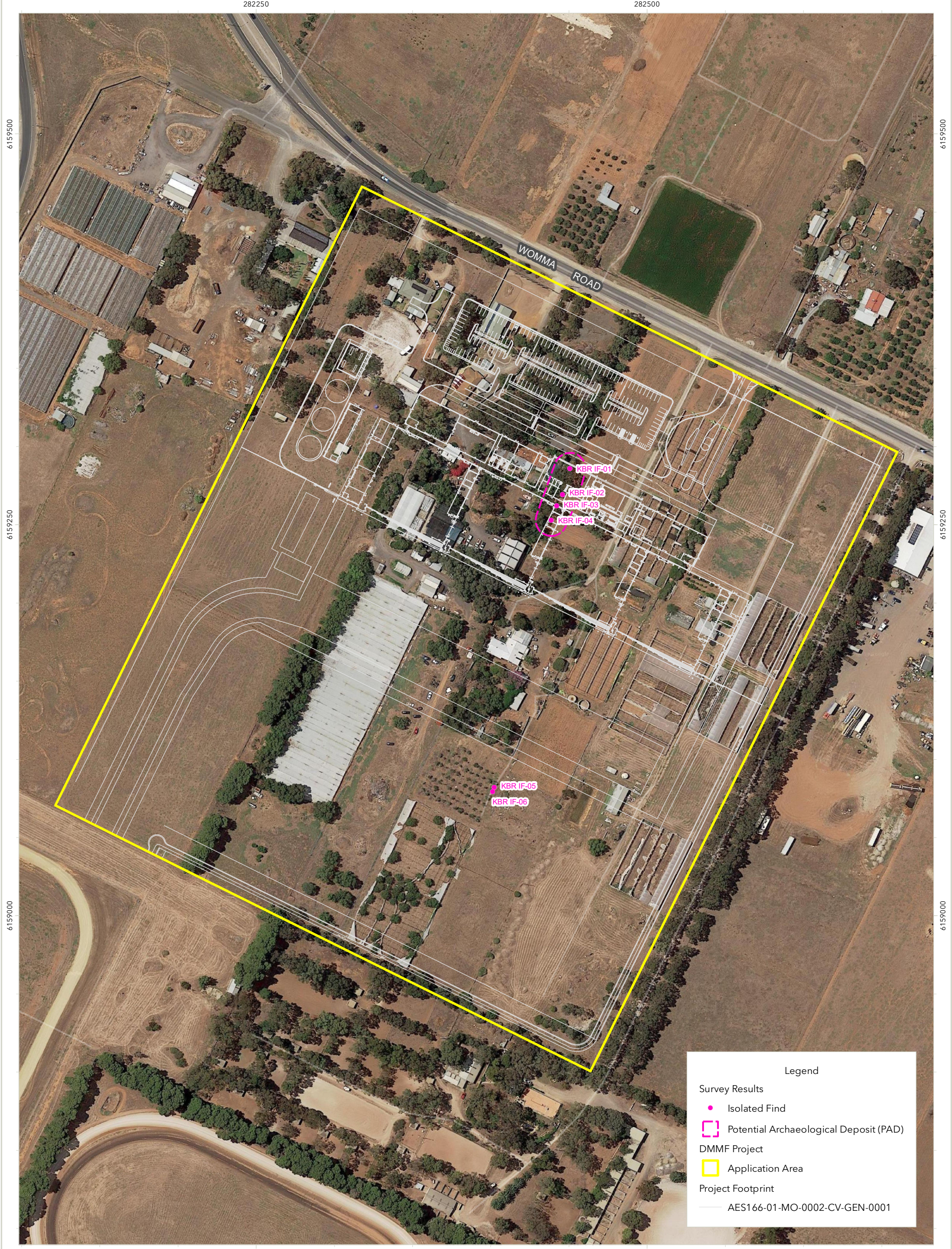
DMMF SITE PLAN - Project Site

- Legend
- | Description | Symbol |
|-------------------|--------|
| DMMF Project Site | |
| Isolated Find | |

Based on drawing no.: AES166-SITE
 Renewal SA Defence Deep Maintenance & Modification Facility



The information provided on this map is indicative only and cannot be guaranteed or relied upon. The recipient (including third parties) must make and rely on their own inquiries as to the currency, accuracy and completeness of the information contained herein. Renewal SA does not warrant the information provided on this map and will not be liable or responsible for any loss, damage or costs incurred as a result of the use or reliance on this map. Areas and dimensions are approximations only.
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Horizontal Datum : GDA94
 Map Projection : MGA94
 Distance Units : Metres
 Map Scale : 1 = 2,250

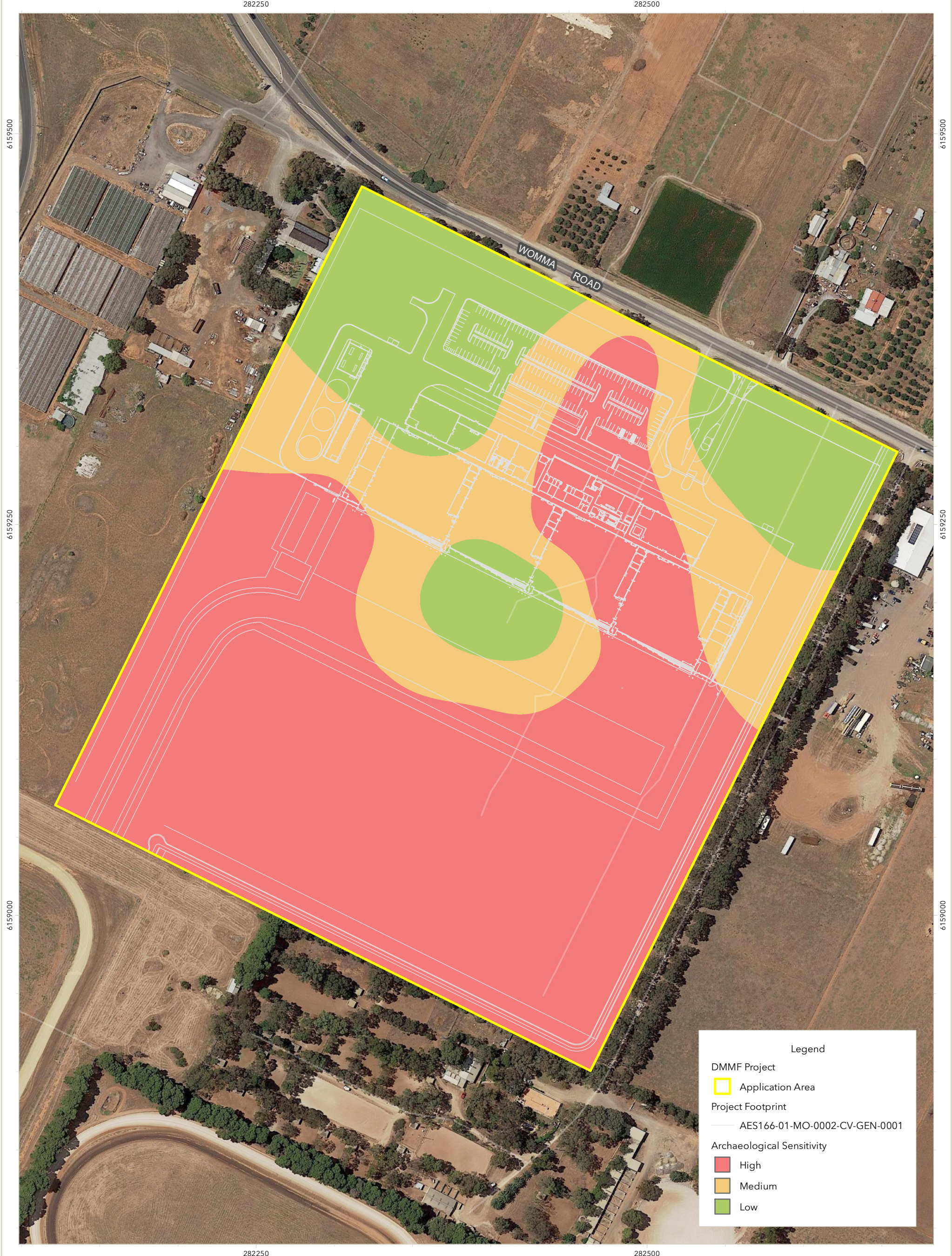
0 25 50
 Metres



Renewal SA DMMF Project
 AHA Application

Project Plan and Previously Recorded Sites

Source Document : KBR01 - AHA - Project Plan and Previously Recorded Sites
 Published : Andrew Maland on 18/03/2024



Legend

DMMF Project

- Application Area

Project Footprint

- AES166-01-MO-0002-CV-GEN-0001

Archaeological Sensitivity

- High
- Medium
- Low



Horizontal Datum : GDA94
 Map Projection : MGA94
 Distance Units : Metres
 Map Scale : 1 = 2,250



Renewal SA DMMF Project
 AHA Application

Archaeological Zoning Plan (AZP)

Source Document : KBR01 - AHA - Archaeological Zoning Plan
 Published : Andrew Maland on 18/03/2024

Attachment 4 – List of acronyms and abbreviations

AAR	Attorney General's Department - Aboriginal Affairs and Reconciliation
Act	<i>Aboriginal Heritage Act 1988 (SA)</i>
Applicant	Urban Renewal Authority trading as Renewal SA
Application Area	The area that is 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, 2 and 3
CMW	CMWGeosciences
Committee	State Aboriginal Heritage Committee
Defence Force	Commonwealth Department of Defence
DMMF	Deeper Maintenance and Modification Facility Project
EDP-HMP	Edinburgh Defence Precinct – Heritage Management Plan
Facility	DMMF
heritage	Aboriginal sites, objects and remains as defined in the Act
KCHMP	Kaurna Cultural Heritage Management Plan
KYAC	Kaurna Yerta Aboriginal Corporation RNTBC
Minister	Minister for Aboriginal Affairs
m	metre
mm	millimetre
ND&A	Neale Draper & Associates Pty Ltd
PAD	Potential Archaeological Deposit
Project	Excavations and other earthworks associated with the construction of four aircraft hangars, warehouses, workshops, offices, storage facilities and pump stations; installation of infrastructure, roads, curbing, and services; landscaping, including vegetation clearing; and works associated with the establishment of a temporary compound.
PSAZP	Project-specific archaeological zoning plan
RAAF	Royal Australian Air Force
RNTBC	Registered Native Title Body Corporate