

# Consultation Information Pack

## Riverlea Development Stormwater Channels

Updated to include new Attachments 5 and 6 on 6 March 2026

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

<b>Applicant</b>	Walker Pastoral Pty Ltd
<b>Application type</b>	Sections 21, 23 and 29(1)(b) of the <i>Aboriginal Heritage Act 1988 (SA)</i>
<b>Application Areas</b>	<p>The Application Areas are shown on the maps at Attachments 1- 3.</p> <p>Application Area 1 includes a portion of CT 5868/778, the road reserve of Legoe Road between CT 5868/778 and CT 5399/96, a portion of CT 5399/96 and a portion of the road reserve of Carmelo Road.</p> <p>Application Area 2 includes a portion CT 6286/790 running along an unmade road reserve of Beagle Hole Road, an unmade and unnamed road reserve as well as a small section of the Thompsons Creek Channel.</p>
<b>Proposed activities</b>	The Applicant seeks to undertake ground-disturbing works to construct stormwater management channels, and to carry out archaeological salvage works for any Aboriginal heritage that cannot be avoided by these works, as needed to facilitate this construction (Project).

Figure 1 - View south over Application Area 1, adjacent to Tippets Bridge Road – image provided by the Applicant



## INTRODUCTION

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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)(a) of the Act from Walker Pastoral Pty Ltd (Applicant). The Applicant seeks to undertake ground-disturbing works to construct stormwater management channels, and to carry out archaeological salvage works for any Aboriginal heritage that cannot be avoided by these works, as needed to facilitate this construction (Project).

The Application Areas are located entirely within the native title boundary of the Kaurna People, whose native title rights and interests are represented by the Kaurna Yerta Aboriginal Corporation RNTBC (KYAC).

Section 21 of the Act makes it an offence to excavate land for the purposes of uncovering Aboriginal sites, objects and remains (together, heritage) without the Minister's authorisation, while 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.

A joint archaeological field survey covering the Application Areas was conducted by the Applicant's consulting archaeologist with Kaurna representatives in May 2025. The survey identified Aboriginal objects on the surface within the Application Areas and immediate surrounds and identified the potential for Aboriginal heritage to be discovered under the ground surface.

As the Project will involve ground-disturbing works that will impact, and may require the excavation of, heritage, the Applicant sought authorisations under section 21 and 23 of the Act. Authorisation is also sought under section 29(1)(b) to remove Aboriginal heritage from the state for scientific testing and analysis, if this is requested by KYAC.

If authorised, the Project would involve the salvaging (that is, the recording, excavation, collection, removing, and relocation) of any Aboriginal heritage that cannot be avoided by the Project.

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) conduct 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.

**Information about the Project and the Applicant's proposed heritage management measures in this document are based on information provided by the Applicant.**

## PROJECT OVERVIEW

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### The Applicant

The Applicant, Walker Pastoral Pty Ltd, 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 (formerly Buckland Park).

### Application Areas

There are two discrete Application Areas relevant to the Project, as shown in the map at Attachment 1. Application Area 1 (shown in yellow) includes a portion (approximately 65m x 68m) of CT 5868/778, the road reserve of Legoe Road between CT 5868/778 and CT 5399/96, a portion of CT 5399/96 (approximately 65m x 828m) and a portion (approximately 65m x 1.5m) of the road reserve of Carmelo Road. Application Area 2 (shown in orange) includes a portion CT 6286/790 (approximately 48m x 720m) running along an unmade road reserve of Beagle Hole Road, an unmade and unnamed road reserve as well as a small section of the Thompsons Creek Channel (approximately 65m x 29m).

The Application Areas are close to, and partly abut, existing areas that were granted authorisations under the Act on 9 October 2024 (**Authorised Areas**) as well as other areas that are subject to a further application for authorisations that has been submitted to AAR by the Applicant (see Figure 2).

Figure 2 – provided by the Applicant – Shows 2024 Authorisation Areas in green, the Application Areas relevant to the Project in red (which are the subject of this consultation) and areas subject to a future application for authorisations under the Act, in blue.



## Project Background

The Buckland Park Township development - now known as 'Riverlea' - was declared a major development in 2003, with four precincts planned over 25 years. The full Riverlea development would see 12,000 residential properties built to accommodate around 33,000 residents. Construction commenced in 2021, with Precinct 1.

On 9 October 2024, the Minister granted authorisations under the Act to facilitate the construction of Precinct 2, as well as parts of Precincts 1, 3 and 4. An extract of the instrument of authorisation, including the conditions that were imposed, and a map of the Authorised Areas is included at Attachment 4. Construction of housing and infrastructure within the Authorised Areas, as well as the construction of a Kurna Memorial Resting Place, is ongoing, following the conditions of the 2024 authorisation.

The Riverlea development is currently supported by a series of water channels, whose function is to divert stormwater from the Riverlea development and direct it into the sea, via the Thompson Creek Channel. The Applicant advises that, eventually, a series of saltwater lakes and a detention basin will be key to stormwater management for the Riverlea development.

Currently, existing water channel infrastructure consists of channels immediately east of Tippets Bridge Road draining south to Legoe Road; and another channel immediately north of Legoe Road draining west to where Tippets Bridge Road and Legoe Road intersect (known as the 'Legoe Road Channel'. This is the most northerly point of Application Area 1.

There is another pre-existing channel running west of the intersection of Thompson and Beagle Hole Roads. This is known as the 'Thompson Creek Channel'. This intersection generally marks the most southerly point of Application Area 2 (see Attachment 1).

Currently, water from the western end of the Legoe Road Channel is being pumped out and discharged to an open drain at the northern end of Tippets Bridge Road, which eventually feeds into Thompson Creek to the south of Carmelo Road. The Project will replace this temporary pumping solution.

The Project aims to connect existing channels by way of continuing the channels, through the Application Areas as well as the 2024 Authorised Areas, to ensure that stormwater from the Riverlea development is diverted and appropriately managed.

This current application, relating to the Project, is to facilitate the Applicant's stormwater mitigation strategy for the Riverlea development only (that is, the construction of stormwater channels). A separate application for authorisations under the Act for the construction of the remainder of the Riverlea development (Precincts 3 and 4) has also been lodged with AAR. There will be a separate consultation with Aboriginal parties on this application in the future.

Figure 3 - View south over Application Area 2 (Beagle Hole Road) toward the Thompson Creek Channel – image provided by the Applicant



### Project details

The Project will manage flooding and stormwater across the Riverlea development in accordance with the Applicant’s flooding and stormwater mitigation strategy. To achieve this, the Project would involve the construction of a series of flooding and stormwater mitigation channels extending to the Thompson Creek Channel.

As the current channel network terminates near the intersection of Tippets Bridge and Legoe Roads, further channel construction is required to fully implement the flood and stormwater mitigation strategy to connect the channel system to the Thompson Creek Channel.

A system of regional gravity-fed drainage channels will protect the Riverlea development from localised and regional flood events. The completed channel network will manage and convey floodwater breaking out of Kadlitparri (the Gawler River), to protect urban development against flooding events and manage stormwater outflows from the development.

The land reserved for the Riverlea development generally drains away from Kadlitparri in a south-westerly direction towards the Thompson Creek Channel. As a result of the Project, overland flooding from Kadlitparri would be diverted into the channel system that directly flows to the Thompson Creek Channel, which will then discharge into the ocean.

Notwithstanding the diversion of floodwaters, the Applicant states the Riverlea development will not take water from Kadlitparri either directly or indirectly. The Applicant says that it does not propose to alter natural water flows to or from Kadlitparri.

The channel design will have a base width of between 10 and 28m and a maximum depth of 2.5m from surface level. The channels will incorporate native species landscaping where possible. The Applicant says the channels are expected to provide an inland habitat for fauna. Figure 4 provides an example and photograph of the species that are planned to be used by the Applicant in the regeneration of the channels, once completed.

Figure 4 – image provided by the Applicant - Samphire and Austral Seablite regenerating in existing channels within the Riverlea development



## Scope of authorisations sought

The Applicant is seeking that the authorisations, if granted, extend to:

- itself
- employees, agents, advisors, contractors and subcontractors of the above.
- current or future owners, lessees or occupiers of land, reserves and other facilities in the Authorisation Area
- any entities and their employees, agents, students and volunteers engaged to undertake research activities where those people or bodies are reasonably undertaking works in connection with the Project and/or the land more generally.

Specifically, the Applicant advises that it is seeking authorisation under section 29(1)(b) to allow Aboriginal heritage (that is, samples) to be sent interstate or overseas for scientific analysis, if requested to do so by KYAC.

The Applicant is seeking that any authorisations extend to all future works required for the development, maintenance or use of services connected with the Project, through to 2040.

The Applicant anticipates the works would begin as soon as possible, if the authorisations are granted.

## ABORIGINAL HERITAGE WITHIN THE APPLICATION AREAS

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The Applicant engaged heritage consultancy firm Neale Draper and Associates (ND&A) to conduct anthropological consultation, an archaeological field survey, as well as prepare a risk assessment. The survey was conducted in May 2025 with Kurna representatives nominated by KYAC and representatives from the RAW Group, which at that time provided cultural heritage management services for KYAC. A report was prepared and submitted to AAR in support of this application. The risk assessment analysed landforms, hydrology and archival aerial and satellite imagery to identify areas containing 'potential archaeological deposits' (PADs). The analysis builds on the aerial imagery study conducted under conditions 19 and 20 of the 2024 authorisations for the Riverlea development (Attachment 4). The survey, risk assessment and report included the Application Areas relevant to this consultation (as shown in Attachments 1 -3), in addition to those areas relating to a separate application for authorisations relating to further stages of the Riverlea development (shown in blue at Figure 2).

Within, and nearby to, the Application Areas, the survey identified isolated Aboriginal objects (IOs) as well as PADs. The heritage that was identified within the Application Areas all intersect in Application Area 1 (as shown on the map at Attachment 2). No heritage or PADs were identified in Application Area 2.

The heritage discovered during the survey near Tippetts Bridge Road, inside Application Area 1, is listed below:

- IO-13 - 12 burnt clay heat retainers
- IO-14 - 10 quartz bipolar flakes

Two PADs - PAD 8 and PAD 6 - also intersect with Application Area 1. PAD 8 is described by ND&A as 'Western Creek Paleochannel'. A Paleochannel is a river or creek that no longer carries water, some artefacts were documented at the southwestern section of the paleochannel although it is the northeastern end of the paleochannel known as PAD 8 that intersects with the Application Area. IO-13 was discovered nearby to PAD 8.

PAD 6 is described as 'Thompson Creek Channel Segment'. Thompson Creek is made up of multiple branches that carry storm and flood water which flow southwest toward the Thompson Creek Channel. The areas where the creek crosses Tippetts Bridge Road and Carmelo Road via pipes is frequently inundated due to the flow capacity of the pipe. PAD 6 is covered in silty sand and clay typical of a creek bed. IO-14, comprising 10 quartz bipolar flakes, as identified during in the survey. The flakes are described as being small and may have been carried by water, or may be still located at the site of their original manufacture.

## PROPOSED MANAGEMENT OF ABORIGINAL HERITAGE

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The Applicant initially engaged ND&A to develop measures for managing discovered Aboriginal heritage, where it cannot be avoided during Project works.

ND&A's heritage management recommendations are based on the surface discoveries made during the field survey and on the assessed risk of finding archaeological discoveries below the surface.

### Recommended Heritage Management

The report recommends that prior to carrying out any Project activities within PAD 6 and PAD 8 - shown in green on the map at Attachment 2 - the Applicant should treat the PADs as an extension of AAR ID #176 (see Attachment 4) with the objects on the surface collected and recorded, and the area subject to archaeological test excavations to determine if sub-surface archaeology and/or burials are present. Upon completion of the archaeological investigations, standard heritage monitoring of Project earthworks should be conducted, consistent with condition 10 of the October 2024 authorisations under the Act (see Attachment 4), summarised below:

Heritage monitoring of earthworks (including topsoil stripping)

- a) make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one for each piece of earth moving equipment engaged in excavation works, for the purpose of observing all ground excavations
- b) where the offer is accepted, Aboriginal heritage monitors must be retained until excavations are complete, or until they reach a level that is, in the view of an archaeologist, culturally sterile or bedrock Archaeological sampling and excavations
- c) where after consulting with KYAC, an archaeologist reasonably considers it necessary, engage an archaeologist to undertake excavations (including trenching) to capture further information about the nature or extent of the heritage. An Authorised Party must have regard to the *Riverlea Park Development - Heritage Impact Procedure* in carrying out any excavations
- d) notwithstanding the above, AAR may instruct an Authorised Party regarding the extent of archaeological excavations that must occur
- e) create a register of all Aboriginal objects identified within PAD 6 and PAD 8 including at minimum for each Aboriginal object, where practical:
  - attribute a unique identifier number
  - record its location using a global positioning unit (GPS) unit (or equivalent technology) with an accuracy of no less than 20 cm
  - record raw material, object type, manufacture technique (where relevant, and where these attributes can be readily identified)
  - record any relevant information about the context in which the object is located, and any other archaeological observations relevant to the object
  - and where considered necessary by an archaeologist to demonstrate the range of objects within a given area, take a scale photograph

Note: For the purposes of the Authorisations, to make an offer in good faith means an offer in writing to KYAC's nominated contact person(s) (or the person(s) acting in that position/s from time to time) at least two business days prior to any work commencing or resuming (as applicable).

In addition to the above, the Applicant has further committed to following AAR's Aboriginal Heritage Discovery Protocols if heritage is discovered during Project works. Visit [agd.sa.gov.au/heritage-applications](http://agd.sa.gov.au/heritage-applications) for a copy of AAR's current Aboriginal Heritage Discovery Protocols.

If you would like a hardcopy of any of these documents posted to you, please contact AAR.

## Aboriginal engagement

Up until 2026, the Applicant engaged ND&A to consult and work with KYAC, as well as Traditional Owners and custodians who have an interest in the Application Areas, including in the development of the Cultural Heritage Assessment Report (2025) which includes the Application Areas. The Applicant advises that it has since engaged heritage consultancy firm, Austral Archaeology, to supervise and carry out all heritage management activities, with Kaurna representatives, in consultation with KYAC for the Riverlea Project, under the existing authorisations, and any proposed and future authorisations.

## SECTION 13 CONSULTATION

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Before considering whether to grant any authorisation under the Act, section 13 of the Act 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.

### Aboriginal Community Consultation Meeting

An Aboriginal Community consultation meeting will be held for Traditional Owners and any other interested Aboriginal parties from 10:30 am on **Saturday 14 March 2026** at Tauondi Aboriginal College, 1 Lipson Street, Port Adelaide, SA 5015.

### Please RSVP for catering purposes

To RSVP to attend the Aboriginal Community consultation meeting, please call (08) 7322 7821 or email [aar.heritagesubmissions@sa.gov.au](mailto:aar.heritagesubmissions@sa.gov.au)

### Invitation for submissions from interested Aboriginal parties

Verbal and written submissions are now invited from all interested Aboriginal parties about the Project. Consultees may make a submission to AAR in person, or 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.

This document is also available online at [agd.sa.gov.au/heritage-applications](http://agd.sa.gov.au/heritage-applications)

### CONSULTATION CLOSURES ON THURSDAY 9 APRIL 2026.

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, RSVPs, submissions and/or requests for further information should be addressed to:

**Jeremy Sibbald**

Project Officer (Heritage), AAR

Mail: GPO Box 464, ADELAIDE SA 5001

Email: [aar.heritagesubmissions@sa.gov.au](mailto:aar.heritagesubmissions@sa.gov.au)

Telephone: (08) 7322 7821

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

- 1. Should the authorisations sought by the Applicant be granted? 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?**

AAR will collate all submissions, the Applicant's responses to them, the Committee's advice, and its own recommendations to the Minister to assist them 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 9 April 2026**.

**How your submission will be used**

All submissions will be forwarded to the Applicant in full for an optional response, unless you request that any cultural information be kept confidential.

AAR will accommodate such requests where it can. However, procedural fairness may require that the Applicant be provided with as much information as possible to respond. AAR will discuss with you any request you may make for your submission to be considered on a confidential basis.

Once the consultation period has closed, submissions and the Applicant's responses to them will be provided to the Committee, and the Committee's advice will then be sought.

All submissions, the Applicant's responses to them, the Committee's advice and AAR's recommendations will be forwarded to the Minister to assist them to decide the application.

Thank you for taking the time to consider this document. If you are an interested Aboriginal party, AAR encourages you to make a submission about this application. AAR is available to assist you if you have difficulty recording a submission.

## Attachments:

**Attachment 1:** Map of Application Areas – Riverlea Stormwater Channel Areas.

**Attachment 2:** Map of Application Area 1 – Adjacent Tippets Bridge Road between Legoe and Carmelo Roads and Aboriginal heritage.

**Attachment 3:** Map of Application Area 2 – Adjacent portion of Beagle Hole Road to Thompson Road

**Attachment 4:** Excerpts from the 2024 authorisations including map of 2024 Authorised Areas and the Riverlea Park Development Discovery Protocols and Heritage Impact Procedures – included as conditions of the 2024 authorisations.

**Attachment 5:** Additional information - significance of the Riverlea area and Aboriginal heritage discovered near Application Area 2 during the May 2025 heritage survey

**Attachment 6:** Map of Application Area 2 – showing nearby heritage within the 2024 Authorisation Area

## REFERENCES

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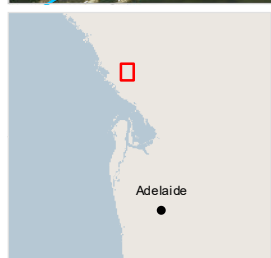
Neale Draper and Associates, 2025 - *Kaurna Cultural Heritage Assessment Report Riverlea Development Supplementary Application Areas, SA Aboriginal Heritage Act (1988)* Unpublished report for Walker Buckland Park Developments Pty Ltd.

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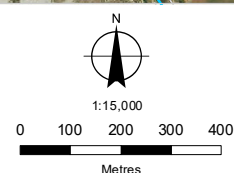
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Sections 21, 23 and 29(1)(b) Application Areas - Riverlea Development Stormwater Channels



- Application Areas**
- Application Area 1
  - Application Area 2
- Roads**
- Main
- Watercourses**
- Watercourses



Produced by: Aboriginal Affairs and Reconciliation (AAR)  
 Data sources: Aboriginal heritage - AAR  
 Topographic / cadastral - Location SA  
 Aerial imagery - DEW  
 Lambert Conformal Conic | GDA2020  
 Projection | Datum: 2025580\_001  
 Job No: 23/02/2026  
 Compiled:

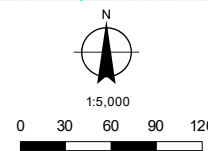
Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA). AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map. This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises as a result of the use of this information by any person or organisation. This map is not to be reproduced or distributed without prior approval from AAR.

Sections 21, 23 and 29(1)(b) Application Area 1 - Riverlea Development Stormwater Channels



- Application Areas**
- Application Area 1
- Aboriginal Heritage**
- Isolated Stone Object
  - Potential Archaeological Deposit
- Roads**
- Main

Produced by: Aboriginal Affairs and Reconciliation (AAR)  
 Data sources: Aboriginal heritage - AAR  
 Topographic / cadastral - Location SA  
 Aerial imagery - DEW  
 Projection | Datum: Lambert Conformal Conic | GDA2020  
 Job No: 2025580\_002  
 Compiled: 23/02/2026

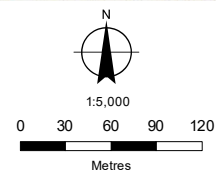


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Sections 21, 23 and 29(1)(b) Application Area 2 - Riverlea Development Stormwater Channels



- Application Areas**
- Application Area 2
- Roads**
- Main
- Watercourses**
- Watercourses



Produced by: Aboriginal Affairs and Reconciliation (AAR)  
 Data sources: Aboriginal heritage - AAR  
 Topographic / cadastral - Location SA  
 Aerial imagery - DEW  
 Projection | Datum: Lambert Conformal Conic | GDA2020  
 Job No: 2025580\_003  
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### Conditions of Authorisation

In accordance with my powers under section 14 of the Act, I impose the following conditions upon the Authorisations granted in this instrument:

#### **General**

1. Authorised Parties remain subject to any obligations that they may have under the Act (as amended from time to time) and any other applicable legislation not otherwise addressed in the Authorisations.
2. Where any Aboriginal heritage is discovered anywhere within the Authorisation Area, an Authorised Party must comply with the *Riverlea Park Development – Aboriginal Heritage Discovery Protocols* (Attachment 3).
3. An Authorised Party must engage an archaeologist to oversee the excavation and recording of any Aboriginal sites or remains discovered within the Authorisation Area.

#### **Kaurna Cultural Heritage Management Plan (KCHMP)**

4. An Authorised Party must ensure that the KCHMP for the Project is updated if required to make it consistent with the Authorisations, and thereafter provide copies of the amended KCHMP to the Kaurna Yerta Aboriginal Corporation RNTBC (KYAC) and Aboriginal Affairs and Reconciliation (AAR).
5. Where the KCHMP is inconsistent with the Authorisations, the terms of the Authorisations prevail to the extent of any inconsistency.

#### **Management of Burial Location 1**

6. An Authorised Party must:
  - a) ensure that all known or discovered in-situ Aboriginal remains within Burial Location 1 (that area shown in blue at Attachment 4) are retained in their current locations, and are not subject to further excavation or any destructive scientific analyses
  - b) as far as reasonably possible, in cooperation with, and in a manner that is culturally acceptable to, KYAC, return to and rebury within Burial Location 1 all Aboriginal remains previously removed from it, in locations as close to their discovery locations as possible
  - c) after using best endeavours to seek to co-design it with KYAC, create a memorial Resting Place for Aboriginal remains (and if agreed by KYAC, other heritage) at Burial Location 1
  - d) not conduct any Project Activities or Research Activities within Burial Location 1, other than in compliance with the Authorisations.

*Note: Subject to Condition 6(a), prior to burial or reburial occurring, and subject to KYAC's agreement, no condition in the Authorisations requiring burial or reburial within Burial Location 1 prevents:*

- *the collection of samples from remains for the purpose of **Research Activities**, including for their removal from the state for destructive analyses*
- *non-destructive Research Activities on remains undertaken either inside or outside of the Riverlea Park Development Master Plan Area.*

## OFFICIAL

*Note: Any references to **contacting KYAC** in the Authorisations mean contacting KYAC's nominated contact person(s) (or the person(s) acting in that position/s) from time to time. Any references to **KYAC's agreement** in the Authorisations mean the written agreement of the KYAC Board given in accordance with the corporation's rules and procedures for decision making.*

### **Ongoing management and maintenance of Burial Location 1 (Resting Place)**

7. The Applicant must, after consulting with KYAC as reasonably required from time to time, ensure the Resting Place is maintained in good order and kept free from damage, defacement, rubbish, or vermin for the duration of the Authorisations.

### **Management of Burial Location 2**

8. An Authorised Party must:
  - a) determine the extent of the Aboriginal remains at Burial Location 2 in accordance with the process set out in the *Method for Delineation Works* (Attachment 5)
  - b) follow the *Method for Managing Aboriginal Remains* (Attachment 6) for all Aboriginal remains identified at Burial Location 2.

*Note: The area depicted in teal at Attachment 7 is the initial 'Discovery Zone' for the purposes of Step 2 of the Method for Delineation Works. Additional Discovery Zones may be created in accordance with Step 5 of the Method for Delineation of Works.*

### **Management of specified known heritage areas**

9. Prior to carrying out any Project Activities in any parts of the areas identified as AAR ID# 174 (formerly HIMA #1), AAR ID# 175 (formerly HIMA #2) and sites 6628-7788 and 6628-7792 (shown on the map at Attachment 1), an Authorised Party must:

#### Surface heritage inspection and collection

- a) engage an archaeologist, and make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one, to:
  - conduct a pedestrian survey to seek to identify all visible surface Aboriginal objects (including stone artefacts, organic material and heat retaining stones)
  - for each Aboriginal object, where practical:
    - attribute a unique identifier number
    - record its location using a global positioning unit (GPS) unit (or equivalent technology) with an accuracy of no less than 20 cm
    - record raw material, object type, manufacture technique (where relevant, and where these attributes can be readily identified)
    - record any relevant information about the context in which the object is located, and any other archaeological observations relevant to the object
    - and where considered necessary by an archaeologist to demonstrate the range of objects within a given area, take a scale photograph
  - remove each Aboriginal object from its location, and place each in an appropriately labelled bag/container for secure storage within the Riverlea Park Development Master Plan Area (as shown in Attachment 1), unless storage or return elsewhere is agreed by KYAC.

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*Note: For the purposes of the Authorisations, to **make an offer in good faith** means an offer in writing to KYAC's nominated contact person(s) (or the person(s) acting in that position/s from time to time) at least two business days prior to any work commencing or resuming (as applicable).*

Heritage monitoring of earthworks (including topsoil stripping)

- b) make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one for each piece of earth moving equipment engaged in excavation works, for the purpose of observing all ground excavations
- c) where the offer is accepted, heritage monitors must be retained until excavations are complete, or until they reach a level that is, in the view of an archaeologist, culturally sterile or bedrock

*Note: For the purposes of the Authorisations, where there is any disagreement between KYAC and an Authorised Party about what the **adequate number of heritage monitors** may be, AAR may definitively decide the matter.*

Archaeological sampling and excavations

- d) where after consulting with KYAC, an archaeologist reasonably considers it necessary, engage an archaeologist to undertake archaeological excavations (including trenching) to capture further information about the nature or extent of the heritage. An Authorised Party must comply with the *Riverlea Park Development - Heritage Impact Procedure* (Attachment 8) in carrying out any such excavations
- e) notwithstanding the above, AAR may instruct an Authorised Party about the extent of archaeological excavations that must occur in AAR ID# 174 (formerly HIMA #1), AAR ID# 175 (formerly HIMA #2) and sites 6628-7788 and 6628-7792

*Note: In the Authorisations and attachments, a reference to an **archaeologist** means a professional archaeologist with an honours or postgraduate degree in archaeology recognised in Australia who is engaged by an Authorised Party to undertake Project or Research Activities.*

Register of discovered Aboriginal objects

- f) create a register of all Aboriginal objects identified within these areas, including at minimum the information collected at Condition 9(a).
10. Prior to carrying out any Project Activities within AAR ID# 176 (formerly HIMA #3), shown in pink on the map at Attachment 1, an Authorised Party must:

Heritage monitoring of earthworks (including topsoil stripping)

- a) make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one for each piece of earth moving equipment engaged in excavation works, for the purpose of observing all ground excavations
- b) where the offer is accepted, Aboriginal heritage monitors must be retained until excavations are complete, or until they reach a level that is, in the view of an archaeologist, culturally sterile or bedrock

Archaeological sampling and excavations

- c) where after consulting with KYAC, an archaeologist reasonably considers it necessary, engage an archaeologist to undertake excavations (including trenching) to capture further information about the nature or extent of the heritage. An Authorised Party must have regard to the *Riverlea Park Development - Heritage Impact Procedure* (Attachment 8) in carrying out any excavations
- d) notwithstanding the above, AAR may instruct an Authorised Party regarding the extent of archaeological excavations that must occur

Register of discovered Aboriginal objects

- e) create a register of all Aboriginal objects identified within AAR ID# 176 (formerly HIMA #3), including at minimum the information required to be recorded under Condition 9(a).

**Culturally Modified Trees**

An Authorised Party must not:

- 11. deliberately damage, fell, or remove any culturally modified trees within the Authorisation Area, except with the agreement of KYAC
- 12. prune or otherwise maintain any culturally modified trees in the Authorisation Area unless it is necessary for public safety, in which case this work must only be performed by a qualified arborist following an Authorised Party giving KYAC five business days' written notice of the proposed maintenance, and offering in good faith to engage at least one Aboriginal heritage monitor to observe, and provide cultural input into, the works.

**Aboriginal remains from outside Burial Location 1**

An Authorised Party must:

- 13. ensure any Aboriginal remains discovered in the Authorisation Area outside Burial Location 1 prior to the date of the Authorisations are reburied within it in a manner that is, as far as reasonably possible, culturally acceptable to KYAC, and in a way that seeks not to disturb other known burials within Burial Location 1
- 14. ensure that any Aboriginal remains discovered in the Authorisation Area outside Burial Location 1 after the date of the Authorisations, which in the view of an Authorised Party, having followed the *Riverlea Park Development – Aboriginal Remains Discovery Protocol* (Attachment 3), cannot reasonably be retained in their original locations, are reburied within Burial Location 1 in a manner that is, as far as reasonably possible, culturally acceptable to KYAC, and in a way that seeks not to disturb other known burials within Burial Location 1
- 15. where, after consulting with and considering the views of KYAC and AAR, an archaeologist reasonably considers it necessary, engage an archaeologist to sieve excavated soils associated with discovered Aboriginal remains outside Burial Location 1. AAR must be notified if an Authorised Party or an archaeologist decides that sieving will not occur where Aboriginal remains are discovered

16. notwithstanding the above, despite the archaeologist's or an Authorised Party's decision to the contrary, AAR may still require an Authorised Party to sieve or rebury excavated soils that are reasonably likely to be associated with heritage discoveries.

### Testing and management of Aboriginal objects

17. Subject to the Authorisations and the requirements of the *Riverlea Park Development – Aboriginal Heritage Discovery Protocols*, an Authorised Party must arrange for the secure storage, management, return and/or reburial of any Aboriginal objects collected from within the Authorisation Area, as reasonably required by KYAC.
18. An Authorised Party may only undertake destructive and non-destructive analyses of Aboriginal object/s from the Authorisation Area, and/or remove them from the state, with the agreement of KYAC.

### Aerial / satellite imagery analysis and investigation

19. An Authorised Party must:
- a) prior to conducting Project Activities in any part of the Authorisation Area, first prepare an historic and contemporary aerial / satellite imagery analysis report (**Aerial Imagery Report**) for that part, which seeks to identify potential earthen mounds and/or burial sites within the Authorisation Area. The Aerial Imagery Report must:
    - provide an analysis of aerial and satellite imagery available for that part of the Authorisation Area (including both historic and contemporary imagery) and highlight any landscape features that may, in the opinion of an archaeologist, indicate the presence of Aboriginal earthen mounds and/or Aboriginal burial sites
    - include all aerial imagery used to make any conclusions in the report
    - be prepared in such a way that it can be distributed by AAR to Traditional Owners and interested Aboriginal people and organisations upon request
    - use best endeavours to ensure that this data includes imagery from each decade, beginning in the 1940s
    - be provided to KYAC and AAR for review, prior to finalisation.
20. Where potential burials and/or earth mounds are identified in the Aerial Imagery Report (or AAR's review of it), and where Project Activities are proposed within such areas, ensure that the following works occur there:
- a) the extent of the potential burials and/or earth mounds is physically demarcated using non-invasive bunting (**Investigation Area**)
  - b) an Authorised Party must make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one for each piece of earth moving equipment engaged in excavation works, for the purpose of observing all ground excavations until excavations are complete, or until they reach a level that is, in the view of an archaeologist, culturally sterile or bedrock
  - c) where Aboriginal heritage is discovered, the *Riverlea Park Development – Aboriginal Heritage Discovery Protocols* are followed

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- d) at the conclusion of steps (a) through (c), provide a report to KYAC and AAR outlining the results of the excavation works.

*Note: For the avoidance of doubt, Project Activities must not occur within Investigation Areas until steps (a) through (d) are completed.*

### Heritage monitoring of soil stripping across the Authorisation Area

21. The Applicant must make an offer in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors, being at least one for each piece of earth moving equipment engaged in excavation works, to observe all stripping of vegetation and topsoil, to a depth reasonably determined by an archaeologist, across the entire Authorisation Area.

### Legislative Awareness Training

22. An Authorised Party involved in or directly managing ground-disturbing Project Activities must undergo a legislative awareness and a heritage identification session, approved by AAR, that covers the relevant provisions of the Act, the *Coroners Act 2003* (SA) and the Authorisations, prior to taking part in those Project Activities.

### Aboriginal heritage reporting and site card requirements

23. An Authorised Party must comply with the Aboriginal heritage reporting and site card lodgement requirements as set out in Attachment 9.

### General reporting requirements

24. An Authorised Party must, for the first five (5) years after the date of the Authorisations, provide six-monthly reports to KYAC and AAR documenting progress of the Project and all its intersections with Aboriginal heritage. With respect to both the period being reported upon, and in total, the report must, at minimum, include a summary of:
- a) the timing, nature and location of current and near-future Project Activities
  - b) a plain English summary of the Aboriginal heritage information recorded in compliance with Condition 23, including photographs where appropriate
  - c) the status and condition of the Burial Location 1 Resting Place, including the date and number of any Aboriginal remains reinterred there
  - d) the nature, extent and location of all Aboriginal heritage being held in storage by an Authorised Party
  - e) the nature and extent of any Aboriginal heritage reburied, relocated, or returned to KYAC
  - f) the nature and outcomes of any Research Activities
  - g) the management and maintenance of culturally modified trees within the Authorisation Area, including photographs
  - h) the number of Aboriginal heritage monitors engaged
  - i) a summary of approvals sought and/or received from KYAC
  - j) a summary of any disputes with KYAC or any other Traditional Owners about Aboriginal heritage, Project Activities or Research Activities

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- k) a statement of compliance with each of the conditions of the Authorisations.
25. For the five (5) years after the first five (5) years of the Authorisations, an Authorised Party must provide reports containing the information required by Condition 24 to KYAC and AAR annually.

*Note: The reporting requirements in Conditions 24 and 25 are addition to the requirements imposed by the Riverlea Park Development – Aboriginal Heritage Discovery Protocols and Condition 23 of the Authorisations.*

**Under section 14 of the Act, an Authorised Party, who without reasonable excuse, contravenes or fails to comply with a condition of the Authorisations, is guilty of a criminal offence.**



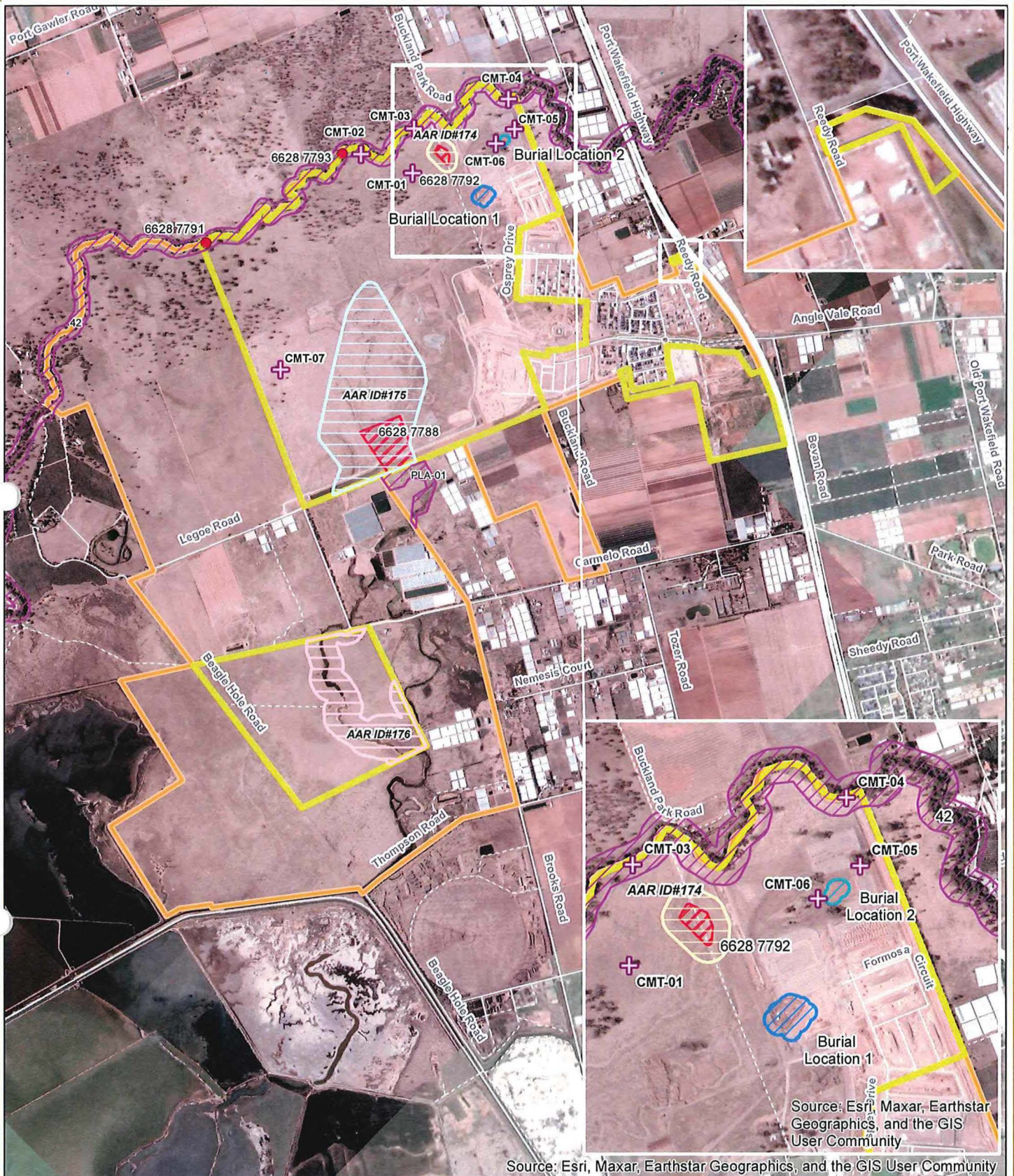
**HON KYAM MAHER MLC  
MINISTER FOR ABORIGINAL AFFAIRS**

9 / 10 / 2024

**Attachments:**

1. Map of the Authorisation Area showing known Aboriginal heritage
2. List of coordinates for the Authorisation Area
3. Riverlea Park Development – Aboriginal Heritage Discovery Protocols
4. Map of Burial Location 1 boundary and list of coordinates
5. Method for Delineation Works
6. Method for Managing Aboriginal Remains
7. Map of Burial Location 2 'Discovery Zone' for the purposes of the Method of Delineation Works, and list of coordinates
8. Riverlea Park Development - Heritage Impact Procedure
9. Reporting and site card lodgement requirements

Attachment 1 - Authorisation Area and known Aboriginal heritage



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



**AAR Heritage Sites**

- Listed
- Listed
- Reported
- + Reported (Culturally Modified Tree)

**Burial Locations**

- Burial Location 1 boundary
- Burial Location 2 'Discovery Zone'

**Heritage Impact Mitigation Areas**

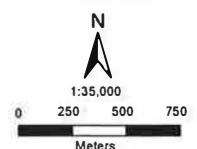
- AAR ID #174 (HIMA #1)
- AAR ID #175 (HIMA #2)
- AAR ID #176 (HIMA #3)

**Authorisation Area**

- Authorisation Area
- Riverlea Park Development
- Master Plan Area

**Roads**

- Highway
- Secondary Road
- Minor Road



Produced by: Aboriginal Affairs and Reconciliation (AAR)  
Data sources: Aboriginal heritage - AAR; Topographic / cadastral - Location SA; Aerial imagery - BlackSky; Lambert Conformal Conic I GDA2020 2024236-001  
Projection | Datum: Lambert Conformal Conic I GDA2020  
Job file: 20/09/2024  
Completed:

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA). AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy and completeness of the information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises as a result of the use of this information by any person or organisation.

This map is not to be reproduced or distributed without prior approval from AAR.

# Riverlea Park Development – Aboriginal Remains Discovery Protocol

Consider avoiding impacts to heritage wherever possible.

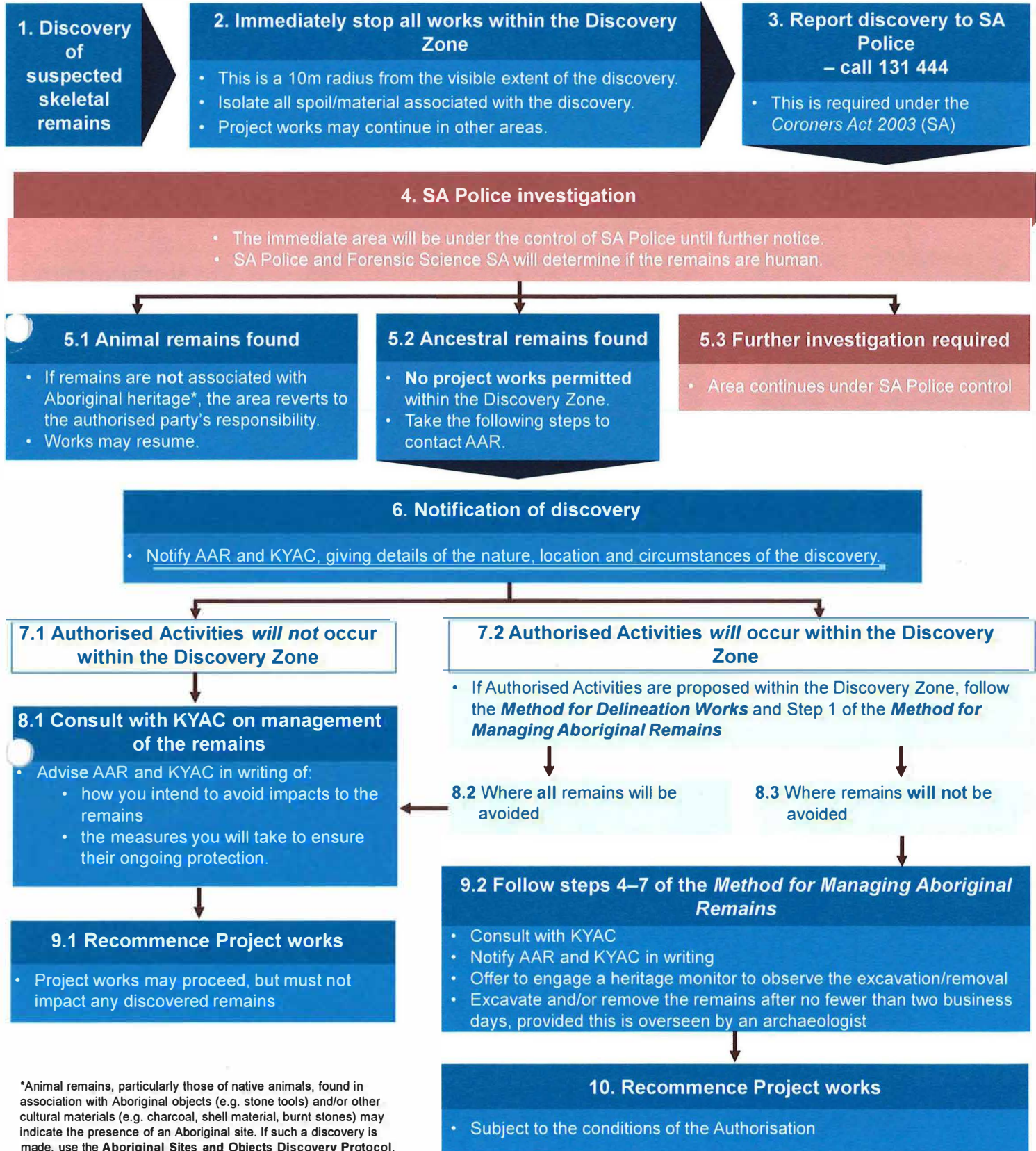
Where impacts are unavoidable, they should be mitigated to the extent possible.

Any reference to Aboriginal Affairs and Reconciliation (AAR) is also a reference to the relevant Minister or their delegate.

## Responsible parties

You - Authorised party

SA Police



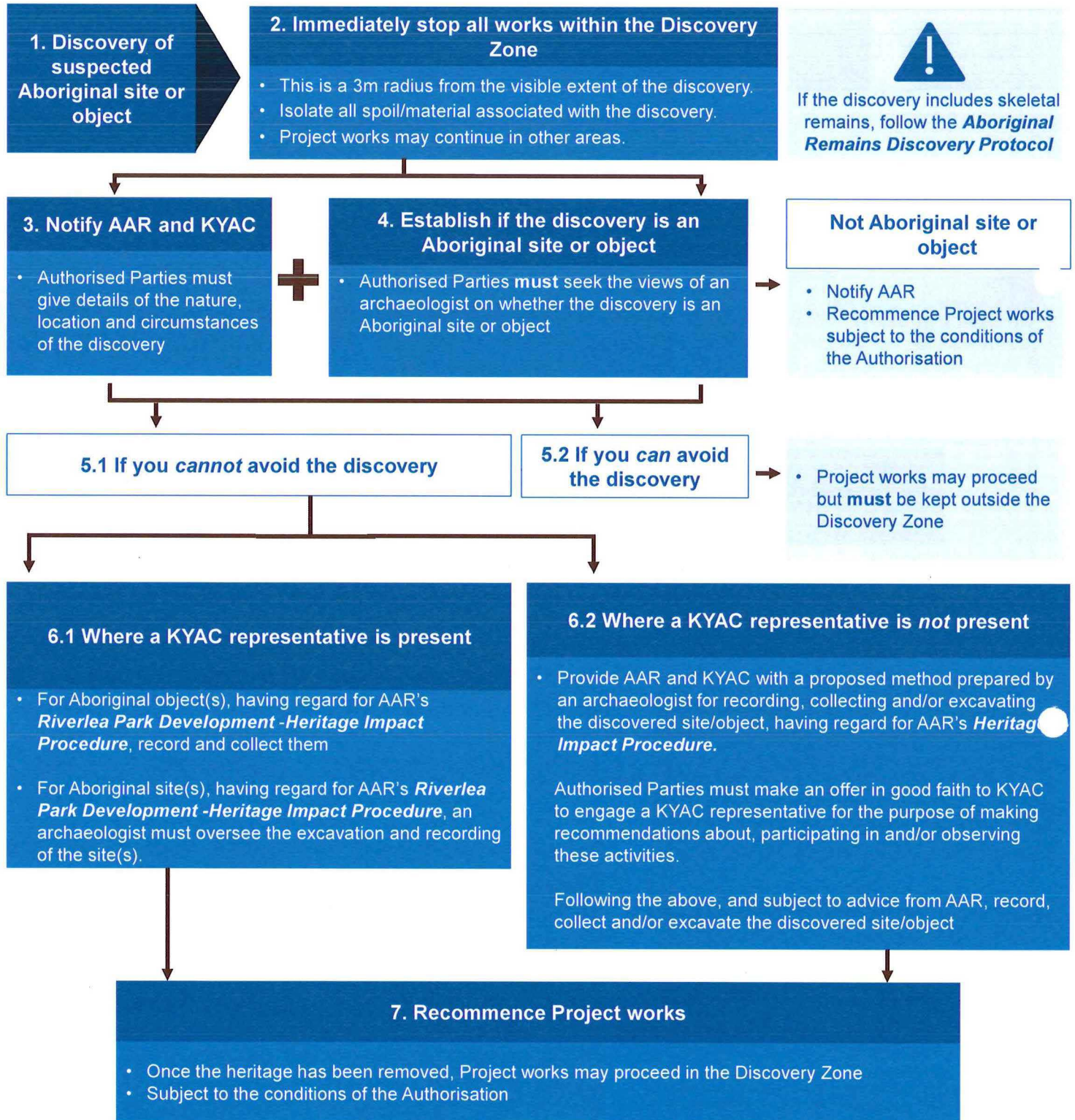
\*Animal remains, particularly those of native animals, found in association with Aboriginal objects (e.g. stone tools) and/or other cultural materials (e.g. charcoal, shell material, burnt stones) may indicate the presence of an Aboriginal site. If such a discovery is made, use the *Aboriginal Sites and Objects Discovery Protocol*.

# Riverlea Park Development – Aboriginal Sites and Objects Discovery Protocol

Consider avoiding impacts to heritage wherever possible.

Where impacts are unavoidable, they should be mitigated to the extent possible.

Any reference to Aboriginal Affairs and Reconciliation (AAR) is also a reference to the relevant Minister or their delegate.



## Attachment 5 - Method for Delineation Works

Where Authorised Activities are proposed within 10 m of any Aboriginal remains located outside Burial Location 1, including those that may be discovered during the course of Project Activities, an Authorised Party must first ascertain whether the burial forms part of a larger Aboriginal burial site (**Delineation Works**). In carrying out the Delineation Works, an Authorised Party must ensure that:

1. AAR and KYAC are notified in writing of the discovery of the Aboriginal remains, and the Authorised Parties' intention to carry out Delineation Works
2. an area measuring 10 m in radius from the visible extent of the Aboriginal remains is measured and physically demarcated using non-invasive bunting (**Discovery Zone**)
3. the Discovery Zone is subject to careful excavation and removal of soil in layers of no more than approximately 10 cm deep using a hand trowel, shovel or small excavator, This excavation must occur until - in the view of an archaeologist - culturally sterile layers or bedrock is reached
4. all excavations are visually observed by an archaeologist, and that an offer is made in good faith to KYAC to engage an adequate number of Aboriginal heritage monitors to observe the works
5. where additional Aboriginal remains not associated with the original Aboriginal remains (i.e. any new set of remains or part thereof) are encountered within any Discovery Zone, Steps 1 through 4 must be followed. This includes the notification requirements at Step 1, and the creation of an additional Discovery Zone at Step 2
6. the above steps must be followed until no further remains are identified
7. write to AAR and KYAC detailing the outcomes of the Delineation Works, giving particulars of the total number, nature, location, and distribution of Aboriginal remains encountered, including through the provision of spatial data and a detailed map
8. following completion of the Delineation Works, an Authorised Party will be required to follow the *Method for Managing Aboriginal Remains* (Attachment 6) where the remains will not be avoided.

*Notes: For the avoidance of doubt:*

- where **Aboriginal remains are discovered** in the process of carrying out Delineation Works, Authorised Parties are required to comply with any directions issued by the Minister under the Act in relation to the protection and preservation of the discovered Aboriginal remains.
- no excavation of remains is permitted until after the *Method for Managing Aboriginal Remains* has also been followed (Attachment 6)
- despite the foregoing, where Delineation Works would extend beyond the footprint required for Project Activities, or beyond the Authorisation Area, the Delineation Works should cease to avoid unnecessary disturbance of Aboriginal remains.

**Attachment 6 - Method for Managing Aboriginal Remains**

Following completion of Delineation Works (see Attachment 5 – Method for Delineation Works), an Authorised Party must:

1. consult with KYAC in line with its obligations under the Kurna Cultural Heritage Management Plan (KCHMP), to establish whether in the Authorised Party's view the Project can reasonably be modified to avoid disturbance of the discovered remains within the Discovery Zone.

**Where an Authorised Party agrees that all remains within the Discovery Zone can be avoided**, an Authorised Party must ensure that:

2. KYAC is consulted regarding the proposed management of the discovered remains
3. AAR and KYAC are notified in writing the outcomes of its consultation with KYAC in arriving at its decision in managing of the discovered Aboriginal remains, as required under steps 1 and 2.

**Where an Authorised Party decides that remains within the Discovery Zone cannot reasonably be avoided, or where some impacts to remains will likely occur**, an Authorised Party must ensure that:

4. KYAC is consulted regarding the proposed management of the discovered Aboriginal remains that may be impacted
5. AAR and KYAC are notified in writing to be advised:
  - that it has decided that avoidance of remains within the Discovery Area is not reasonably possible
  - of the justification for this decision
  - the outcomes of its consultation with KYAC in arriving at the decision in managing the discovered Aboriginal remains, as required under Steps 1 and 4
  - of the proposed method for excavating/collecting/removing the remains from their location, having regard to the *Riverlea Park Development - Heritage Impact Procedure*
6. an offer is made to KYAC in good faith, seeking to engage at least one Aboriginal heritage monitor for the purpose of making recommendations about, participating in, and/or observing activities that will impact the remains
7. having completed the steps above, and after no fewer than two full business days from Step 6, the excavation and/or removal of the discovered remains may occur provided it is overseen by an archaeologist, having regard to the *Riverlea Park Development - Heritage Impact Procedure*.

*Note: references to **contacting KYAC** in this Attachment mean contacting its nominated contact person(s) (or the person(s) acting in that position) from time to time. Any **agreement of KYAC** referred to in this Attachment means the written agreement of the KYAC Board given in accordance with the corporation's rules and procedures for decision making.*

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Attachment 8 – Riverlea Park Development – Heritage Impact Procedure



Government of South Australia  
Attorney-General's Department

## Riverlea Park Development - Heritage Impact Procedure

### *for use by Authorised Parties holding authorisations under the Aboriginal Heritage Act 1988 (SA) in relation to the Riverlea Park Development*

This Riverlea Park Development - Heritage Impact Procedure (**Procedure**) is only for use by parties holding a ministerial authorisation (**Authorised Parties**) under sections 21, 23 and 29(1)(b) of the *Aboriginal Heritage Act 1988* (SA) in relation to the Riverlea Park Development (**Ministerial Authorisation**).

Authorised Parties should refer to the Procedure, following notification to Aboriginal Affairs and Reconciliation (**AAR**) of a discovery of suspected Aboriginal heritage, and where damage, disturbance or interference with the Aboriginal heritage will not be avoided by the authorised activities/works.

This Procedure covers potential methods to be considered in the recording and excavation of discovered Aboriginal heritage, where it will not be avoided by the Authorised Parties (**Heritage Impact Works**). AAR has developed the Procedure to assist Authorised Parties to prepare their own approach for undertaking Heritage Impact Works. The Authorised Parties' methods for Heritage Impact Works should be developed in accordance with this Procedure (where relevant) and any other applicable conditions of the Ministerial Authorisation.

The Procedure is a guide for the management of Aboriginal heritage discoveries. In circumstances where the Authorised Parties and the Kaurna Yerta Aboriginal Corporation RNTBC (**KYAC**) (in consultation with an archaeologist, where one has been engaged) consider that particular circumstances do not warrant the implementation of a process or processes set out below, the Authorised Parties may seek to develop an alternative strategy for managing the discovery.

However, Authorised Parties are advised that any Heritage Impact Works are subject to any direction that the Minister may consider necessary for the protection or preservation of Aboriginal heritage.

Authorised Parties are advised that elements of this Procedure form specific conditions of the Ministerial Authorisation.

**For the avoidance of doubt, where an element of the Procedure is included as a specific condition of the Ministerial Authorisation, it will be mandatory and must be complied with. Authorised Parties are reminded that they are subject to the requirements of applicable State legislation whether or not referred to in the Ministerial Authorisation or its attachments.**

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**Attachment 8 – Riverlea Park Development – Heritage Impact Procedure**

When preparing a methodology for undertaking any Heritage Impact Works, the Authorised Parties should:

- where possible, incorporate recommendations for the management of heritage from KYAC and an archaeologist agreed to by KYAC
- aim to make the methodology fit for purpose. This means that the scope and scale of the Authorised Parties' methodology should be based on the nature and extent of the heritage discovery. It should be sufficiently flexible to allow for any changes that may be recommended (e.g. from KYAC, an archaeologist and/or AAR)
- have regard for the Kurna Cultural Heritage Management Plan (KCHMP).

**In the case of all Heritage Impact Works:**

All Heritage Impact Works should be overseen by an archaeologist, ideally one who is approved by KYAC. Representatives of KYAC should always be notified of, and offered the opportunity to oversee, Heritage Impact Works.

It is recommended that, where appropriate, the following be undertaken:

- any heritage that would otherwise be damaged or destroyed by project works should instead be subject to archaeological excavation, prior to project works occurring
- any archaeological excavation should be conducted based on stratigraphic layers or arbitrary levels (spits) of no more than approximately 10 cm in depth, unless specified otherwise in this document, until base sterile soil or bedrock is reached, and that these excavations:
  - a) should be conducted by hand, where practicable
  - b) where hand excavation is not practicable, should be conducted using a shovel
  - c) where hand or shovel excavation is not practicable, should be conducted using a small mechanical excavator
  - d) should be documented using scale photographs showing, at minimum, each layer that is removed either by hand, shovel or via a small excavator.
- where the nature of the heritage discovered warrants it, all soil material excavated during any Heritage Impact Works (either manually by hand, shovel or machinery) should be sieved using a mesh of no greater than 10 mm so that smaller remains and cultural material can be identified
- all heritage removed during any Heritage Impact Works should be stored in a secure temporary storage location recommended by KYAC and/or an archaeologist, until such time as it is relocated and/or reburied
- the nature, condition and extent of the Aboriginal heritage should be recorded throughout the Heritage Impact Works (where relevant), including scale photographs that show or demonstrate:
  - a) the heritage prior to any Heritage Impact Works, in order to illustrate its location, context and condition at the time of discovery

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**Attachment 8 – Riverlea Park Development – Heritage Impact Procedure**

- b) the progress of any Heritage Impact Works, including cross-section photography of the side walls of any excavation trenches and, where possible, drawings of stratigraphic profiles
  - c) the physical removal of the heritage from its original location (where applicable)
  - d) following completion of the excavation, that the heritage has been completely removed.
- adequate fieldnotes should be made for future reporting purposes
  - the precise location of all heritage subject to Heritage Impact Works should be recorded, using a GPS unit (or equivalent) with sub-20 cm accuracy prior to any Heritage Impact Works.

**In the case of isolated Aboriginal objects:**

- For each object, record:
  - a) the nature of the object, its precise location, depth from ground surface or real level (where recorded and relevant), raw material type, manufacture technique and possible function (where possible)
  - b) any other information or archaeological observations relating to the object
  - c) scale photographs showing the object in its original location prior to removal and at minimum two aspects (sides) of each object.
- Remove the isolated Aboriginal object, and place it in an appropriately labelled bag/container
- Create an inventory (register) of all removed Aboriginal objects.

**In the case of Aboriginal surface sites comprising Aboriginal objects (and other archaeological material):**

- An archaeologist should be engaged to:
  - a) first conduct a comprehensive pedestrian survey of the entirety of the area that will be subject to Heritage Impact Works, in collaboration with the representatives of KYAC, where possible. This pedestrian survey should be undertaken at a narrow scale, ideally no wider than one person per 4 m-wide transect
  - b) use pin flags (or equivalent) to flag the location of all objects and other archaeological material, where considered appropriate
  - c) photographically record the distribution of the objects, using the pin flags for reference
  - d) record the location of each object using a GPS unit (or equivalent) with an accuracy of no less than 20 cm
  - e) record the highest, lowest and mean density of visible surface objects that will be subject to Heritage Impact Works.

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**Attachment 8 – Riverlea Park Development – Heritage Impact Procedure**

- For each Aboriginal object subject to Heritage Impact Works, record:
  - a) raw material, object type, manufacture technique (where known)
  - b) scale photographs showing at minimum two aspects (sides) of the object
  - c) any relevant information about the object, the context in which it is located, and its relationship to the site more broadly
- Remove each Aboriginal object, and place each in appropriately labelled bags/containers
- Create an inventory (register) of all removed Aboriginal objects.

**In the case of archaeological features (including hearths and hearth material):**

- An archaeologist should be engaged to record:
  - a) the nature, extent, depth from ground surface or real level (where recorded and relevant), location and composition of the discovered heritage
  - b) any other information or archaeological observations relating to the discovered heritage, including observations on the nature and distribution of the discovered heritage
  - c) photographically, the distribution/extent of the discovered heritage, using a suitable scale
- An archaeologist should be engaged to excavate and remove the heritage, using hand tools or shovels where practicable, or using a small backhoe in any other case, until the feature has been removed and a culturally sterile layer is reached. Where an archaeological feature extends beyond the extent of the excavated area, broaden the excavation horizontally to capture the entirety of the feature.
- Make a photographic record of the excavation, including scale photographs of each excavated layer and any Aboriginal objects or other cultural materials exposed during the excavation
- Sieve all excavated and associated soils using a sieve with mesh of no greater than 10 mm
- Collect all Aboriginal objects and any other archaeological materials identified during the sieving process, and place them in appropriately labelled bags/containers
- Create an inventory (register) of the materials recovered during the excavation and sieving processes, which at minimum should include an identification of the feature's primary components, and details of any cultural material or other objects identified
- Make a photographic record of the excavation, including scale photographs of each excavated layer and any Aboriginal objects or other cultural material exposed and subsequently removed during the excavation.

**In the case of archaeological sites containing stratigraphic deposits (including middens):**

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**Attachment 8 – Riverlea Park Development – Heritage Impact Procedure**

- Prior to excavations occurring, an archaeologist should be engaged to record:
  - a) the nature, extent, depth from ground surface or real level (where recorded and relevant), location and composition of the site
  - b) any other information or archaeological observations relating to the site. In the case of middens, include observations on the range of shell material (to species level where possible) and any other visible cultural material
  - c) multiple scale photographs taken from the edge of the site facing in, and from the centre of the site facing out
  - d) where possible, drawings of the site's profile showing any changes in stratigraphy and the location of any hearths, pits, or other features present
- An archaeologist should conduct a pedestrian survey of the visible heritage area to identify locations suitable for potential archaeological excavations, taking into consideration the advice of KYAC representatives present
- An archaeologist should excavate no less than one trench – measuring 50 cm by 50 cm – for every 4 square metres of observed heritage, with the trenches excavated in spits (layers) preferably no greater than approximately 10 cm at a time, until a culturally sterile layer (i.e. layer containing no cultural materials) is reached. Trenches should be excavated by hand or shovel or, where these are not practicable, via a small machine excavator
- For sites measuring less than 4 square metres in total area, an archaeologist should excavate one trench – measuring 50 cm by 50 cm – in spits (layers) preferably no greater than approximately 10 cm at a time, until a culturally sterile layer (i.e. layer containing no cultural materials) is reached. The trench should be excavated by hand or shovel or, where these are not practicable, via a small machine excavator
- Make a photographic record of the entire excavation process, including at least one scale photograph at the conclusion of each 10 cm spit excavation and any Aboriginal objects exposed and subsequently removed during the excavation
- Record the precise location of each excavation trench using a GPS unit (or equivalent) with sub-20 cm accuracy
- Sieve all excavated site contents using a sieve with mesh of no greater than approximately 10 mm
- Collect all objects and any other cultural materials identified during the sieving process and place them in appropriately labelled bags/containers
- Create an inventory of the materials recovered during the sieving process for each excavation trench that may include a brief identification of material types (i.e. shell, other faunal remains, heat retainers and charcoal), frequency/number/density of any objects, as well as their nature and dimensions
- Record scale photographs showing each of the main material types recovered during the sieving process.

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**Attachment 8 – Riverlea Park Development – Heritage Impact Procedure**

Note that the remainder of the site that is not subject to the archaeological excavations recommended above should ideally be removed and relocated under the supervision of an archaeologist, and in consultation with KYAC and an Authorised Party. Note, if suspected human skeletal remains are observed at any time, stop works and comply with the Riverlea Park Development Aboriginal Remains Discovery Protocol.

**In the case of Aboriginal remains:**

- An archaeologist should be engaged to record:
  - a) the orientation, articulation, position and direction of the remains
  - b) the depth from ground surface, or real level (where recorded and relevant)
  - c) the extent of the remains present
  - d) the level of preservation
  - e) the size and extent of the original burial cut, where possible
  - f) any cultural materials identified during the excavation, uncovering and removal works, including but not limited to stone artefacts, ochre, faunal remains, charcoal or other organic materials
  - g) any other information or archaeological observations relating to the remains, or the circumstances of their original interment.
- Excavate the entirety of the remains, the surrounding burial cut/feature, as well as all associated cultural materials until a culturally sterile layer is reached
- Remove the remains as carefully as possible, along with any associated Aboriginal objects or other cultural materials, and place them in appropriately labelled environmentally appropriate storage containers
- Make a photographic record of all stages of the excavation, including scale photographs of each excavated layer and any Aboriginal remains/objects exposed and subsequently removed during the excavation.

**In the case of any other Aboriginal site types:**

- In the case of any other Aboriginal site types, the Authorised Party should develop a bespoke methodology in consultation with KYAC and an archaeologist, based on the principals in this Procedure. Authorised Parties are reminded that the Minister may issue directions for the protection of Aboriginal heritage where he/she considers it necessary or appropriate.

## Additional information - significance of the Riverlea area and Aboriginal heritage discovered near Application Area 2 during the May 2025 heritage survey

The Riverlea development covers areas of densely concentrated Aboriginal heritage, reflecting intensive Aboriginal occupation over likely several thousand years. The broader area intersects known ancestral burial areas, culturally modified (scar) trees, Aboriginal campsites, hearth/oven features and a culturally important Kurna anthropological site associated with the Gawler River (Kadlitparri).

The extensive heritage known to exist at the time the 2024 authorisations were granted is shown on the map attached to the authorisations (Attachment 4 (page 8) to this CIP) and is described in the [Consultation Information Pack dated 22 December 2023](#) and available on AAR's website.

Most of the known heritage within the 2024 Authorised Areas is clustered along the tributaries of Thompson Creek. Following the granting of the Ministerial authorisations in October 2024, additional archaeological sites and remains have been discovered and reported to AAR within the 2024 Authorised Areas and managed in accordance with the conditions of the 2024 authorisations. These discoveries provide further evidence of repeated occupation in the area by Aboriginal people over likely thousands of years.

In May 2025, a cultural heritage survey (mentioned in this CIP at pages 8 and 9) was undertaken for future proposed stages of the Riverlea development, and previously unsurveyed portions of the 2024 Authorised Areas. The results of this survey are documented in a report, prepared by Neale Draper and Associates, dated August 2025.

The aim of the 2025 survey was to inspect all areas that had not previously been subject to a survey that were intended for future development at Riverlea, including the two drainage channel Application Areas that are the subject of this CIP.

The 2025 survey identified culturally modified trees, confirmed existing mound features to the north, identified surface artefacts, and areas across the extensive survey area where sub-surface heritage is likely to be encountered.

Isolated objects, and potential archaeological deposits (PADs), identified during the survey **within the current Application Areas** are described in the CIP (at pages 8 and 9) and shown on the map at Attachment 2. This heritage intersects Application Area 1.

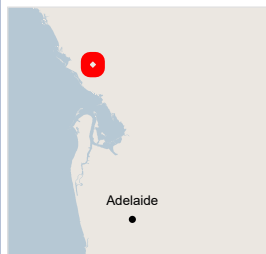
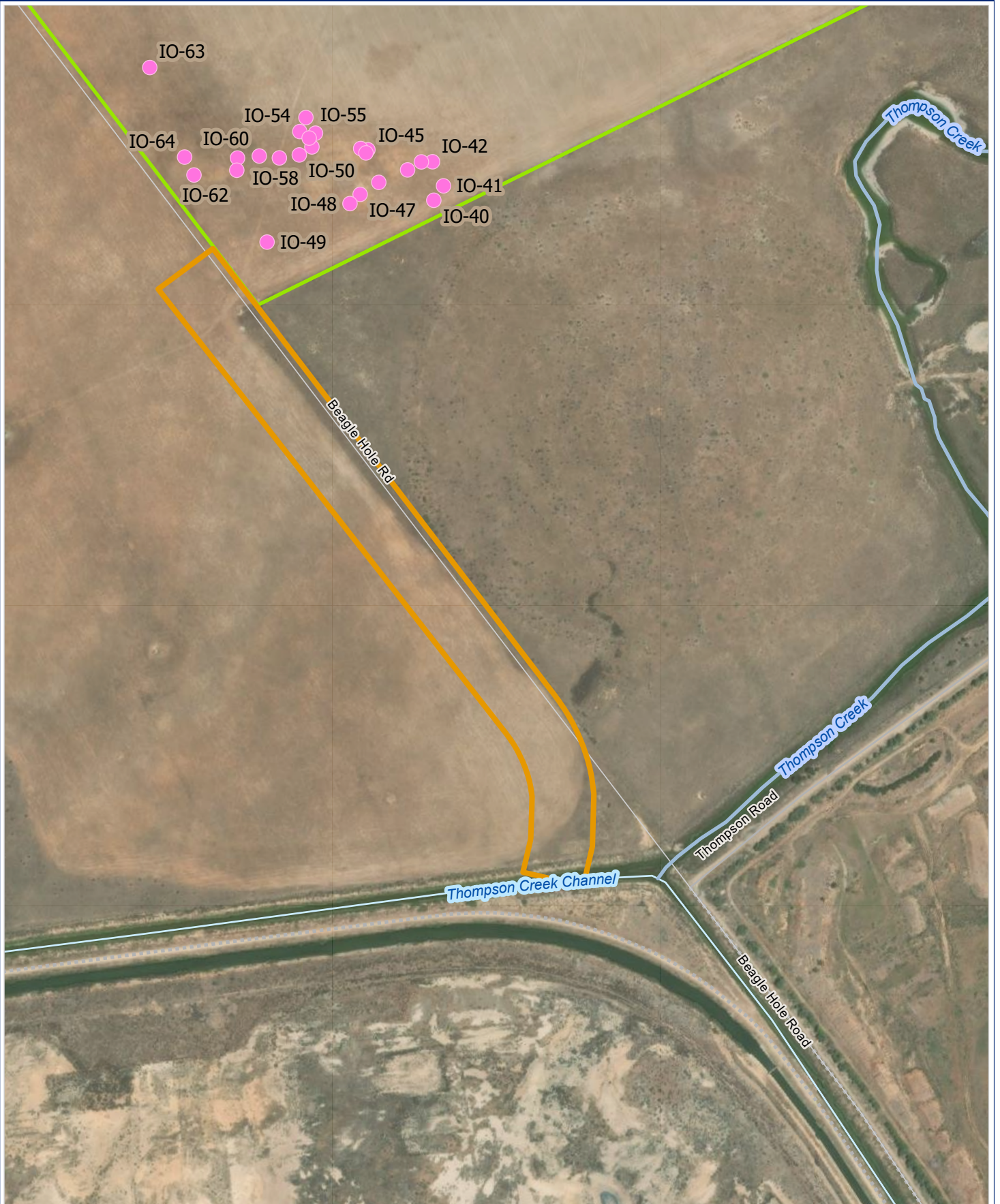
While the May 2025 survey did not identify heritage within Application Area 2, an Aboriginal archaeological site (comprising a cluster of 24 surface objects) was discovered approximately 50 metres to the northeast of Application Area 2 (**see the map at new Attachment 6**).

This discovery was made after the area was identified (through aerial imagery in accordance with Condition 20 of the 2024 authorisations) as an 'Investigation Area'. The artefacts discovered are described as including flakes, cores and broken anvil/grindstones/ hammers and a mussel shell. Due to the high density of the surface finds, it is described in the August 2025 survey report as a 'significant archaeological site'. It falls entirely within the 2024 Authorised Areas.

The location of the finds shown on the map at Attachment 6 are within 50 to 250 metres of Application Area 2. The Applicant advises that it plans to commence stormwater management

works in this site, subject to the conditions of the 2024 authorisations, as part of these Project works, if authorised.

For more information about the Applicant's proposals for the construction of stormwater management infrastructure, including works within the 2024 Authorised Areas and the channel works proposed in Application Areas 1 and 2, a copy of the Applicant's stormwater management plan is available on AAR's website ([agd.sa.gov.au/heritage-applications](https://agd.sa.gov.au/heritage-applications)).



**Aboriginal Heritage**

● Aboriginal site

**Application Areas**

▭ Application Area 2

**Authorisation Area  
(09/10/2024)**

▭ 2024 Authorisation Area

**Watercourses**

~ Thompson Creek

— Thompson Creek Channel



1:5,000

0 50 100 150

Metres

Produced by: Aboriginal Affairs and Reconciliation (AAR)  
Data sources: Aboriginal heritage - AAR  
Topographic / cadastral - Location SA  
Aerial imagery - Vector  
Projection | Datum: Lambert Conformal Conic | GDA2020  
Job No: 2026091  
Completed: 5/03/2026

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