Consultation information pack

Nora Creina Golf and Tourism Resort

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

Applicant	Nora Creina Golf and Tourism Resort Pty Ltd
Application	Sections 21 and 23 of the *Aboriginal Heritage Act 1988* (SA)
Area	The Application Area covers four privately owned allotments, approximately 15 km south-east of Robe, South Australia
Proposed activities	Impacts to Aboriginal heritage sites as a result of the construction of two 18-hole golf courses and associated infrastructure, including resort facilities; maintenance and ongoing operations

Aboriginal Community Consultation Meeting:

Thursday 26 November 2026 at 3:00 pm
Hotel Panorama
625 Goodwood Road, Panorama 5041 SA

Government of South Australia
Attorney-General's Department

Acknowledgement:

The Attorney-General's Department acknowledges and respects Aboriginal peoples as the state's First Peoples and nations and recognises Aboriginal peoples as Traditional Owners and occupants of lands and waters in South Australia.

Cultural warning:

This Consultation Information Pack, and associated material, may contain discussion of Aboriginal heritage and traditions that may have sensitivities for some Aboriginal people.

Content disclaimer:

Information about the Project in this document is based largely on details provided by the Applicant. The Applicant advises that the information may be subject to change but is correct to the best of its knowledge at the time of release.

All images and maps were provided by the Applicant unless otherwise indicated.

Document date: 10 November 2026

INTRODUCTION

Nora Creina Golf and Tourism Resort Pty Ltd (Applicant) has lodged an application for authorisations under sections 21 and 23 of the *Aboriginal Heritage Act 1988* (SA) (Act).

The Applicant has sought the authorisations to enable it to impact Aboriginal sites during ground-disturbing works to construct two 18-hole golf courses and associated infrastructure, resort facilities and accommodation units, and potentially during ongoing operations (Project). The Applicant has sought that the authorisations, if given, extend to the ongoing maintenance and operation of the golf courses, the resort facilities and accommodation units, and other Project elements.

The Application Area comprises four privately owned allotments located approximately 15 km southeast of Robe: Lot 14, Lot 200, Lot 201 and Lot 202, Nora Creina Road (together, the Application Area). The Application Area falls entirely within the native title claim area of the First Nations of the South East No. 1 Named Applicants (FNSE No. 1). Historically, the South East Aboriginal Focus Group (SEAFG) was identified as best representing Aboriginal heritage interests in the Application Area.

Section 21 of the Act makes it an offence to excavate land to uncover Aboriginal sites, objects and/or remains (heritage) without the Minister for Aboriginal Affairs' (Minister's) (or their delegate's) authorisation, while section 23 of the Act makes it an offence to damage, disturb or interfere with Aboriginal heritage without the Minister's (or their delegate's) authorisation.

As the Project will involve ground-disturbing works and operations that will impact eight known Aboriginal sites and will likely require excavation of heritage within those impacted sites, the Applicant has sought authorisations under both section 21 and 23 of the Act.

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

PROJECT OVERVIEW

The Applicant

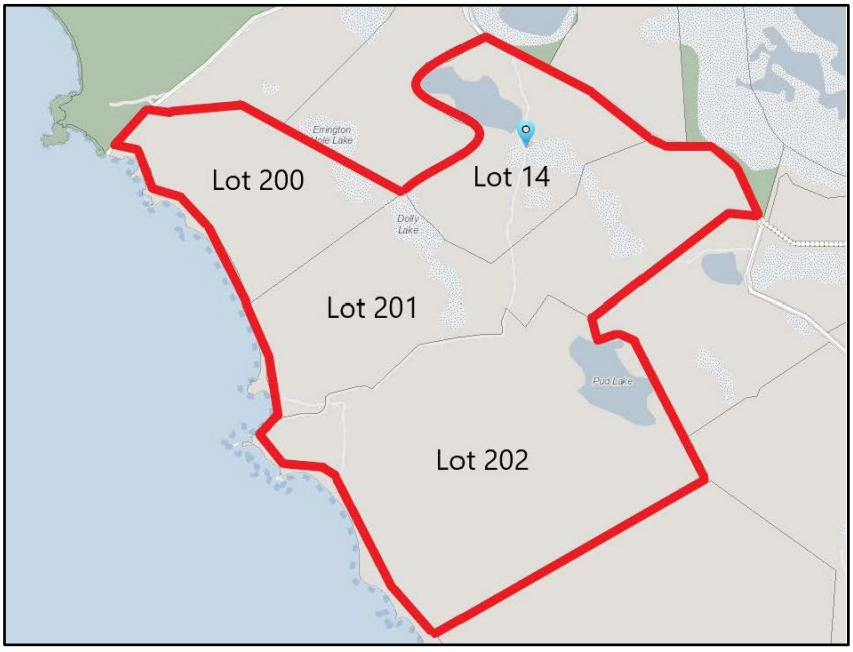
The Applicant is the incorporated entity established to progress the Project.

Application Area

The Application Area comprises the following four allotments (see Figure 1):

- Lot 14 Nora Creina Road (also known as 1462 Nora Creina Road), Nora Creina
- Lot 200 Nora Creina Road, Nora Creina (CT 6071/913)
- Lot 201 Nora Creina Road, Nora Creina (CT 6071/914)
- Lot 202 Nora Creina Road, Nora Creina (CT 6071/915)

Figure 1 – Map of the Application Area (image courtesy of the Applicant)



Project Background

The Project was declared a 'major development' in 2014 under the *Development Act 1993* (SA) (ceased). The declaration required that a Public Environment Report (PER) be prepared and be consulted on. As a result of the public and agency consultation, changes were made to the layout of the proposed golf courses. According to the Applicant, this resulted in improved environmental outcomes, and a reduction in the potential for interference with Aboriginal heritage sites. The Project

received final development authorisation under the *Development Act 1993* (SA) (ceased) by the Minister for Planning in 2019.

Conditions on that development authorisation included:

- adherence to Project timeframes
- compliance with the PER (2016) and the 2017 Public Response Document
- preparation of a Construction Management Plan (CEMP) with the District Council of Robe, the South Australian Environment Protection Authority and the Department for Environment and Water
- **preparation of a cultural heritage management plan (CHMP) in consultation with AAR and SEAFG (Condition 12)**
- preparation of an Environmental Management Implementation Plan; final Integrated Water Management, Coastal and Wetland Management Plans; a Native Vegetation Management, Rehabilitation and Revegetation Plan; a Fauna Management Plan and a Threatened Species Management Plan; and
- adherence to all operational plans during construction works and Project operations.

The Project's development authorisation also notes that further approvals will be required for other Project components that remain in conceptual design stage including the clubhouse building and associated facilities, tourism and function centre, accommodation buildings, wellness retreat, maintenance and other facilities.

Scope of authorisations sought

Authorisations under section 21 and 23 of the Act have been sought for Project construction, operations and ongoing maintenance. The Applicant seeks that the authorisations extend to:

- itself
- its employees, agents, contractors, subcontractors and their subsidiaries where any of them is reasonably undertaking work associated with the Project; and
- any new, joint or part owner of the Application Area, or any part of it, to the same extent.

NEED FOR FURTHER CONSULTATION UNDER THE ACT

Previous consultation carried out by AAR in 2022 and 2024 in relation to the Project

The application for authorisations under the Act to support the Project was received by AAR on 10 August 2021 and was originally consulted on in February and March 2022.

The Committee considered the application in April 2022, including the submissions that resulted from AAR's original 2022 consultation.

In 2024, a decision was yet to be made on the application. In the interests of procedural fairness, given that the views of interested Aboriginal parties were over two years' old at that time, AAR contacted the Aboriginal parties who had made submissions in 2022 to understand if their views were maintained. This occurred in May 2024.

All consultation materials, including responses provided by the Applicant in relation to submissions that had been received, were considered again by the Committee in June 2024.

Why is AAR consulting interested Aboriginal people again?

A decision is yet to be made on the application.

Since 2024, AAR has become aware of new information that Traditional Owners and other interested Aboriginal parties have not been consulted on. The new information is:

1. *Nora Creina Golf Course and Resort CHMP, dated August 2025 (CHMP), prepared by the Applicant, with the assistance of AAR*

In October 2024, AAR agreed to assist the Applicant in developing a suitable CHMP for the Project, in the interests of protecting the Aboriginal sites the Applicant had stated it would avoid, and to ensure best-practice mitigation and management for the heritage sites the Applicant intended to impact.

The Applicant submitted the August 2025 CHMP to the Department for Housing and Urban Development in August 2025, seeking to satisfy Condition 12 of its development authorisation (see page 3 above).

Until late October 2026, AAR had been awaiting a decision from the Minister for Planning on whether the CHMP satisfied Condition 12 before commencing its final round of consultation under the Act.

On 26 October 2026, the Minister for Planning wrote to the Applicant advising that his consideration of whether the August 2025 CHMP satisfies / does not satisfy Condition 12 of the Project's Development Approval would be deferred until a decision is made on the Applicant's application for authorisations under the Act.

2. NC 9 (Site 6823-7939) – new information since 2022 consultation

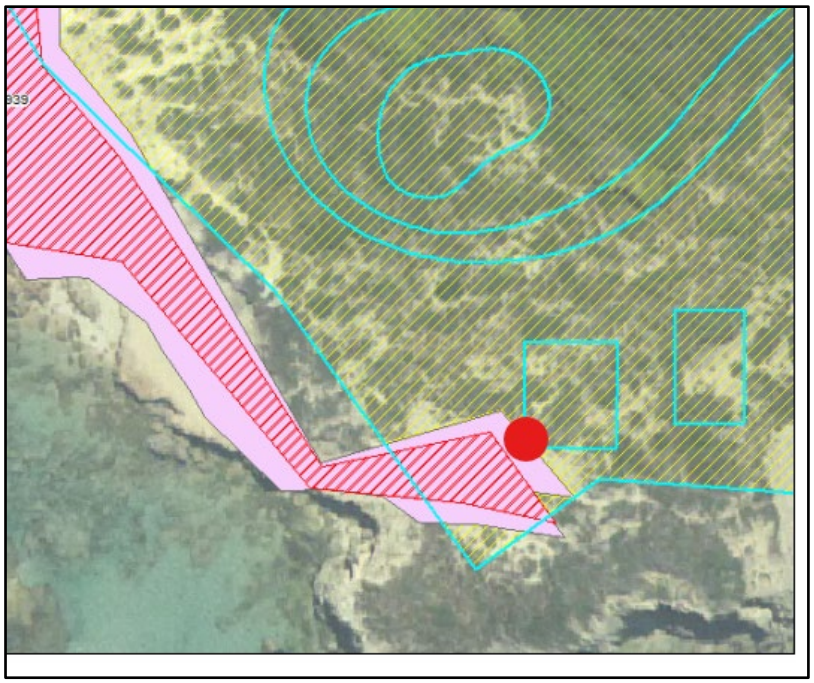
There are 17 sites that intersect the Application Area. Of these, one is designated as NC 9 (site 6823-7939).

The site card lodged in 2015 for NC 9 included a series of grid references marking the boundary of the site. Upon detailed assessment, AAR determined that grid references did not align with the map that accompanied the 2015 site card. To ensure that the full extent of the site was captured by the site's boundary (as far as possible), AAR overlaid the site card grid references with other central archives data, along with a georeferenced site boundary from the site card map. This resulted in an altered boundary for the site that was larger than what was originally recorded in the central archives.

The red hatched area in the figure below (Figure 2) shows the original boundary of NC 9, while the pink shaded area shows larger altered boundary for the same site.

AAR assessed that this new spatial layout meant that a proposed tee area would impact NC 9 by approximately 2 m.

Figure 2 – A map of the original (hatched red) and altered (pink shaded) boundary of NC 9. The red dot represents the 2m impact of the proposed tee area into the exclusion buffer



The Applicant has committed to adjusting the location of the proposed tee area to ensure that its commitment that the Project will avoid impacting the site is maintained.

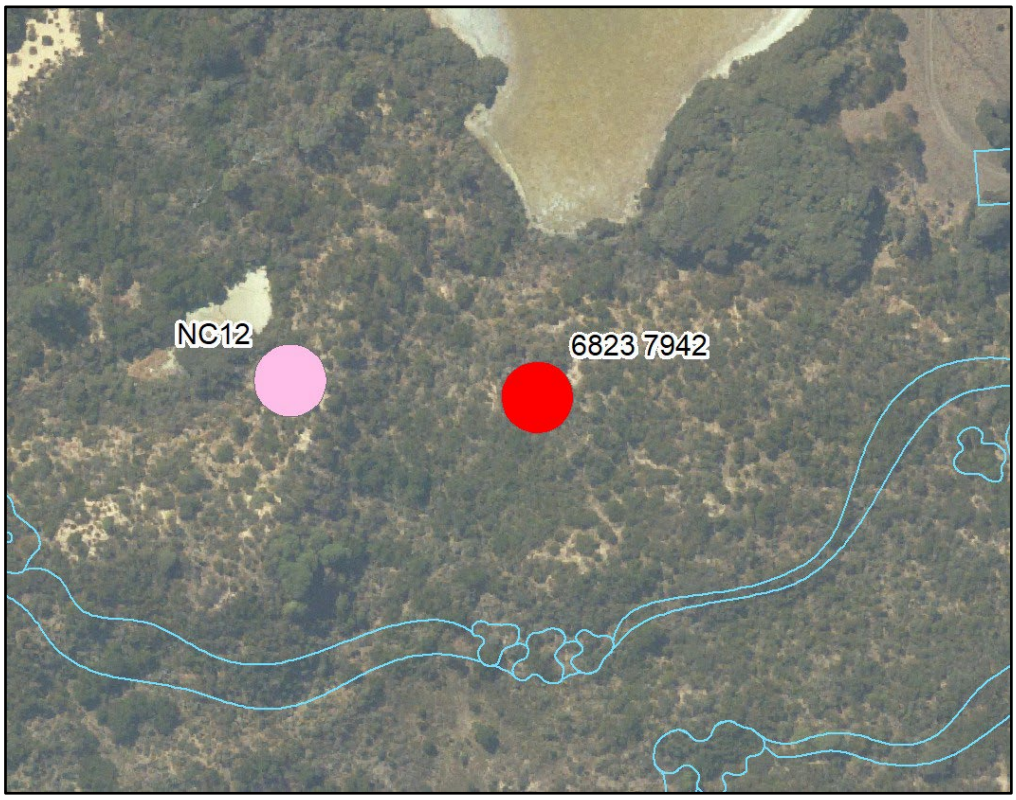
Please note, the map at Attachment 5e does not reflect the relocated tee area according to the Applicant's commitment "to fully accommodate the 5m buffer and ensure the site remains avoided."

3. NC12 (Site 6823-7942) – new information since 2022 consultation

Another site recorded on AAR's central archives, NC 12 (site 6823-7942), was recorded on AAR's central archives as a single point, directly south of Errington Hole Lake. This location was based on the grid reference included in the 2015 site card. However, the map that accompanied the site card depicted the site as being some 70 m to the west, southwest of Errington Hole Lake. AAR sought to clarify the location with Ms Annie Nicholson, the archaeologist responsible for the 2015 recordings. However, AAR did not receive a response to its approach.

In the absence of in-field verification, AAR has depicted NC12 in two possible locations, as either location could potentially be correct (see Figure 3). Given the nature of the original geospatial data, and the inherent difficulties in georeferencing a point on a map, AAR has also implemented a 10 m zone around each potential location for the site.

Figure 3 – Original location of site 6823-7942 (right) and alternative location of NC 12 (left). Errington Hole Lake is shown at the top of this image.



The two potential locations for NC 12 have been shared with the Applicant, which has advised that neither location will be impacted by the Project and as such will be entirely avoided.

Please refer to Attachment 3 for the location of site within the Application Area.

4. Coverage of 2015 heritage survey by Nicholson

Archaeologist Annie Nicholson stated in her survey report after the 2015 survey of the Project area that the survey she led involved "an inspection of the remainder of the development area," which may be read as the area not surveyed by Wood in 2006.

However, AAR's review of the 2015 Nicholson report shows that the survey focused on some coastal dune areas and on inland areas where the Project's clubhouse, accommodation, and other key infrastructure were then to be developed, but did not comprehensively cover what remained of the Project area, meaning that there are substantial areas within the Application Area that are unsurveyed.

Twelve Aboriginal sites were identified during the 2015 Nicholson survey. The 2015 survey also revisited the sites recorded by Wood in 2006 but did not fully 're-survey' the 2006 survey area.

Attachment 4 contains a map showing the approximate areas surveyed in 2006 and 2015 (Nicholson (2015); p23, figure 6).

PROJECT DETAILS

The Project is intended to involve ground-disturbing activities that will impact eight of the known Aboriginal sites within the Application Area to construct:

- two 18-hole golf courses
- a main building complex with clubhouse, pro-shop, function centre, restaurant, a general store and car parking
- practice greens
- an accommodation area within the main building complex, as well as a northern accommodation area comprising lightweight 'pods' and two stand-alone villas, one on the north course and one on the south course
- a building to house a wellness retreat
- a vineyard and beef farm
- a network of roads, tracks, 'boardwalks' and walking trails
- a maintenance compound and supporting infrastructure throughout the Application Area.

In addition to its construction, the Project's ongoing operations also represent a potential to impact Aboriginal heritage through golf patrons making their way unsupervised throughout the Application Area.

A map of the Application Area with the layout of the golf courses and infrastructure boundaries, based upon maps provided to AAR in February 2022, is provided at Attachment 1.

The same map with the known Aboriginal sites depicted is provided at Attachment 3.

Attachment 5 provides closeup imagery of various portions of the Project and how they relate to known Aboriginal heritage.

The following information about the intended Project elements has been provided by the Applicant.

Golf courses

The golf courses would seek to mimic natural shapes in the landscape while minimising the height and depth of natural landscape contours. This would occur using 'cut-and-fill operations'. See Figure 4.

Figure 4 – Aerial photograph of the Application Area facing southeast (image courtesy of the Applicant)



Golf course construction will occur in stages. No clearing is proposed for North holes 10–12 (located in the grazing land), consistent with the maps provided to AAR in February 2022 (see Attachment 3).

Construction of access tracks between holes would seek to minimise impacts to heritage, through confining patrons to the tracks and thereby reducing traffic into other areas.

Main building complex

The extent of the land needed for the main building complex, housing the clubhouse and the resort, is shown at Attachments 1 and 3, and is assessed as being a maximum area of 2.41 hectares between the two golf courses. The main building complex includes sealed car parking, service areas and landscaping.

Given soil in the Application Area is mainly sand over limestone, deep footings for buildings would likely be required, but the depth cannot be determined until concept designs are further developed.

Practice greens

The practice greens would be located adjacent to the main building complex. They would be constructed on grazing land that is relatively flat. Minimal earthworks and vegetation clearance would be required for the practice greens.

Accommodation

The main accommodation areas are located within the main building complex, described as “Club/Resort/Villas” and in an area further to the north, described as “Villas” within a clearance area of 1.23 ha, as shown in Attachments 1 and 3. It is anticipated the northern accommodation will comprise lightweight ‘pods’ requiring minimal or no footings, relying on pins and anchors to secure them in place. Landscaping will include existing and planted vegetation.

There are also two stand-alone villas – one on the north course and one on the south course – that are likely to be more permanent buildings. Given the prevailing soil conditions (sand over limestone), it is anticipated footings for these buildings will be to a depth of up to 2-3 metres. The precise size and extent of the footings is not known at this time. Access to the northern villa (0.25 ha) will be via the “Club/Resort/Villas” carpark. Access to the southern villa is intended through the use of existing tracks, to minimise the clearance of vegetation, and will be subject to final design.

Walking trails

Walking trails would be established to link the lakes, the golf courses, the main building and the beach. The walking trails would require minimal earthworks or vegetation clearance. Some ‘light touch’ structures may be required, particularly towards the beach, to ensure pedestrian traffic does not impact on vegetation or sand dunes, and to ensure beach access is controlled. Any ‘light touch’ structures would be limited to low-impact, above-ground elements (such as boardwalks, small pedestrian bridges or signage) and designed to avoid ground disturbance wherever practicable.

Precise walking trail alignments will be determined at detailed design stage and will be informed by heritage constraints and the CHMP. No walking trails or associated structures will be constructed within Aboriginal site boundaries or the buffer zones set out in the CHMP.

Wellness retreat

A “Wellness retreat” is proposed near Shelley Beach to the southwest of the main building. It has been described by the Applicant as a modest building, built to capture sea views. Landscaping would surround the building, with limited parking primarily for servicing purposes.

Beef farm and vineyard

The extent of the beef farm and vineyard is yet to be determined, as it needs to be balanced with vegetation offsets across the Application Area. However, the farm and vineyard would be within cleared farming land. Ground disturbance would be minimal and similar to that caused by current grazing activities.

Roads and car parking

A major internal road is proposed between Nora Creina Road, the main building and the northern accommodation complex. It would mostly be on cleared farming land and use existing tracks where possible.

Carparking would be adjacent to the main building complex and accommodation, be generally consolidated and shared as much as possible as shown in Attachments 1 and 3.

Service facilities

Maintenance and storage facilities would be located on cleared farming land on the eastern side of the Application Area.

Water storage dams

Any dams required would be constructed on cleared farming area on the eastern side of the Application Area.

Access tracks

Access tracks for maintenance would use existing roads and tracks to the extent possible. Only light vehicles would use these tracks.

Service infrastructure

Service infrastructure necessary to support the Project would include energy, telecommunications, groundwater extraction, water storage, water supply, irrigation, stormwater management and wastewater treatment. This would be constructed on cleared grazing land to the extent possible.

If there were a need for other localised infrastructure services, these would generally be constructed within the 'infrastructure boundaries' shown in Attachments 1 and 3. Golf course irrigation services would be incorporated into either newly cleared golf course areas, access tracks and existing cleared areas.

Potential for project changes

The Applicant has noted that its master plan, provided at Attachment 2, will likely require adjustment during the detailed design stage, as the exact details of the Project are not yet fully developed.

The Applicant states that the proposed development areas shown in Attachments 1 and 3 should be sufficient for the Project's construction, and a size increase would likely not be required.

ABORIGINAL HERITAGE

The Application Area is within the traditional lands of the Bunganditj people. AAR is aware that Ngarrindjeri people have also expressed an interest in the Aboriginal heritage of the area.

Known Aboriginal heritage

AAR holds records for 17 Aboriginal sites within the Application Area. Another determined site (GP 2 (Site 6823-7077)) is adjacent to the Application Area.

The Aboriginal sites are midden sites, mainly concentrated within the foredunes and in shallow troughs behind the dunes. Several are found further inland.

The precise boundaries of the sites are not clear. The sites were either recorded in 2015 or reconfirmed at that time. Even at the time of recording, some site boundaries could not be confirmed due to a lack of visibility of their physical extent. Dune environments are generally dynamic, with the surface sands subject to winds and erosion. This often has the effect of covering up, or exposing, midden material in dune landscapes.

The map at Attachment 3 shows the recorded locations of all the known Aboriginal sites within the Application Area. The site that is adjacent to the Application Area (GP 2 (site 6823-7077)) is not depicted.

AAR notes that the central archives, its records of Aboriginal heritage within South Australia, are not exhaustive. Additional Aboriginal heritage may exist within the Application Area.

Anticipated impacts to Aboriginal heritage

The known Aboriginal sites within the Application Area are listed below, together with their status of "avoided" or "impacted" by construction activities according to the stated intentions of the Applicant:

Aboriginal sites	Status
NC 1 (Site 6823-7930)	Partially impacted on western edge
NC 2 (Site 6823-7931)	Partially impacted on western edge
NC 3 (Site 6823-7932)	Partially impacted on western edge
NC 4 (Site 6823-7933)	Avoided
NC 5 (Site 6823-7934)	Majority of the site impacted
NC 6 (Site 6823-7935)	Avoided
NC 7 (Site 6823-7936)	Partially impacted on western edge
NC 8 (Site 6823-7937)	Avoided
NC 9 (Site 6823-7939)	Avoided[1]
NC 10 (Site 6823-7940)	Partially impacted at its centre
NC 11 (Site 6823-7941)	Avoided
NC 12 (Site 6823-7942)	Avoided
Errington Hole Midden – (Site 6823-2633)	Partially impacted on its eastern side and central area
GP 1 (Site 6823-7076)	Partially impacted
GP 3 (Site 6823-7078)	Avoided
GP 4 (Site 6823-7079)	Avoided
GP 5 (Site 6823-7080)	Avoided

As shown in the above table, eight Aboriginal sites will be impacted by the Project to varying degrees.

AAR notes that the maps at Attachment 5 show that Project elements will impact the avoidance buffers proposed for GP 5 (Site 6823-7080), NC 4 (Site 6823-7933) and NC 9 (Site 6823-7939). However, the Applicant has advised that, where the buffers intersect conceptual golf course elements, those elements will be refined or relocated to ensure that no construction or operational activities occur within Aboriginal site boundaries or their respective buffer areas.

[1] The Applicant has committed to adjust the location of the tee to avoid this site (see pages 5 and 6 above). Note the map at Attachment 5e does not visually reflect this commitment.

ABORIGINAL HERITAGE SURVEYS AND ASSESSMENTS

Below is a summary of the survey reports relevant to the Application Area:

Wood, V (2006) Aboriginal Cultural Heritage Survey and Reporting: South East Abalone, Robe, South Australia A report to the Aboriginal Affairs and Reconciliation Division, Adelaide

In 2006, AAR engaged archaeologist Vivienne Wood to conduct an Aboriginal cultural heritage survey across Lot 200, the coastal portion of Lot 201 and along a proposed access track from Nora Creina Road through Lot 14. The area surveyed was smaller than the Application Area (see Attachment 4).

The survey was for an abalone farm proposed by the landowners which did not proceed. The survey was commissioned after a request was made to the then Minister to determine whether the reported Aboriginal sites on the relevant land were Aboriginal sites as defined under the Act.

Wood's 2006 survey identified five new Aboriginal sites (all shell middens), which were added to AAR's central archives. The naming convention adopted was German Point Site 1 (GP 1) and so on. Four of the sites (GP 1, GP 3, GP 4, GP 5) are relevant to the Application area, while GP 2 sits outside the Application Area.

Three of these sites are in eroded shallow troughs immediately behind the foredunes. The other is some 800 m inland on a low dune.

The sites are variously characterised as low-density scatters of shell material and small numbers of stone artefacts, through to more dense midden deposits. The sites were all found to be suffering from natural erosion and human impacts (e.g. 4WD vehicles).

A previously recorded site (Errington Hole Midden 6823-2633) was re-recorded during Wood's survey and added to the central archives. This site comprises a broad scatter of shell (midden) material on a coastal headland in the north of the Application Area, alongside low-density distributions of flint flakes and flaked pieces with a hammerstones and anvil also present.

Nicholson, A (2015) Aboriginal Cultural Heritage Survey: Proposed Nora Creina Resort, Robe, South Australia Report to the South East Aboriginal Focus Group and Justin and Damian Scanlon

Nicholson and four Bunganditj Traditional Owners undertook a three-day survey of sections of the Application Area in February 2015. The survey was conducted on foot and by vehicle using existing tracks.

The survey was conducted as part of the development planning process for the current Project. Archaeologist Annie Nicholson reported that the Bunganditj are the acknowledged Traditional Owners of the Application Area and that SEAFG had authority to manage cultural heritage matters within the Project on behalf of the Traditional Owners.

Nicholson stated in her survey report that the survey she led involved “an inspection of the remainder of the development area,” which may be read as the area not surveyed by Wood in 2006. However, AAR’s review of the report shows that the survey focused on some coastal dune areas and on inland areas where the clubhouse, accommodation, and other key infrastructure were then to be developed, but did not comprehensively cover “the remainder” of the Application Area.

The 2015 survey also revisited the sites recorded by Wood in 2006 but did not fully ‘re-survey’ the 2006 survey area.

Attachment 4 contains a map showing the approximate areas surveyed in 2006 and 2015 (Nicholson (2015); p23, figure 6).

Nicholson and the Bunganditj Traditional Owners recorded 12 ‘new’ Aboriginal sites, all shell middens. The naming convention adopted was Nora Creina Site 1 (NC 1) and so on. The sites ranged from small, low density surface scatters of shells (NC 4, 11, 12), through medium scatters of shells with limited numbers of stone artefacts (NC 1, 2, 7, 8), to extensive scatters of shells with some stone artefacts covering broad areas (NC 5, 6, 10). Other sites contained *in situ* deposits of stratified shell material and higher numbers of stone artefacts (NC 3, 9).

Most sites were located on the coast, either on low cliffs (NC 8, 9, 10) or in eroded areas and across pavements immediately behind the foredunes (NC 1, 2, 3, 4, 5, 6, 7). Two sites were set back from the coast (NC 11, 12). Some site boundaries were well defined, while others were based on what the survey team could see into the adjacent areas. This means that some of the sites may be larger than recorded in 2015.

Nicholson's site records focus on the significance of the sites to archaeology. However, her report recognises that Traditional Owners assert a wider significance:

…*the community holds strong views about the significance of all evidence of past Aboriginal occupation in the region. Aboriginal sites are seen as an integral part of the broader natural environment and their landscape setting combines with specific site characteristics to present an integrated reflection of Aboriginal occupation of this coastal landscape*. (Nicholson (2015); p28)

Based upon an assessment of the archaeological and traditional significance of the sites discovered and re-identified by the 2006 survey, as well as those discovered by the 2015 survey, Nicholson's 2015 survey report recommended that:

- in compliance with section 20 of the Act, the sites recorded during the survey be reported to AAR and site cards submitted
- as it is possible that cultural materials may extend beyond the currently defined site boundaries, a minimum buffer zone of 50 m be established around the sites
- the 12 new sites be determined to be sites under the Act
- NC 3, 6, and 9, and the Errington Hole Midden (6823-2633) be protected from Project activities through 50m buffer zones and clearly marked with the assistance of Aboriginal community representatives
- all attempts be made to preserve the other Aboriginal sites within the Application Area
- the Applicant seek authorisations under the Act if impacts to heritage cannot be avoided
- site mitigation works (site recording, salvage and storage of cultural materials) by the Aboriginal Community through consultation with SEAFG, be undertaken prior to Project works commencing
- all excavation works be monitored by Aboriginal community representatives identified through consultation with SEAFG
- if Aboriginal heritage is discovered all work must cease and AAR and SEAFG notified
- AAR's Aboriginal Heritage Discovery Protocols govern skeletal remains discoveries
- plans for the then proposed Aboriginal cultural centre and the walking trails be developed with SEAFG

- an outcome-driven commitment be given to the development of employment opportunities for the Aboriginal Community through consultation with SEAFG
- the Applicant develop a CHMP in conjunction with the Aboriginal Community through SEAFG.

Together, the 2006 and 2015 surveys recorded 18 sites. Only 17 of the recorded sites are within the Application Area, with an additional site located (outside of the Application Area) on the southern coastal fringe of Lot 201.

PROPOSED PROTECTION AND MANAGEMENT OF ABORIGINAL HERITAGE

Engagement with Traditional Owners

Most recently, the Applicant engaged heritage consultancy firm Stenhouse Heritage (Stenhouse) in April 2023 to engage with Traditional Owners through SEAFG in the interests of preparing a CHMP for the Project. As a result, a series of meetings and presentations on the Project took place.

However, by October 2024, despite ongoing efforts, a CHMP for the Project had not been progressed.

AAR met with the Applicant in October 2024. On the basis that AAR was interested to protect the Aboriginal sites within the Application Area which the Applicant had committed to avoid, AAR offered to assist the Applicant by providing feedback on its draft CHMP for the Project, while encouraging Traditional Owners (via the SEAFG and FNSE No.1) to engage in the CHMP preparation process.

Cultural Heritage Management Plan

A copy of the Project's CHMP is available for download from AAR's webpage at www.agd.sa.gov.au/heritage-applications.

A hardcopy can also be posted to consultees who request a copy from AAR.

Under the Project's CHMP, the Applicant is responsible for ensuring compliance with the Act; prioritising avoidance of Aboriginal sites it has undertaken to avoid; and implementing heritage protection, management and monitoring measures for all Project activities.

Stenhouse led, on behalf of the Applicant, the preparation of the new CHMP which was finalised in August 2025. It is based on Project designs and information available as at May 2025.

In summary, the CHMP includes:

Site Condition Survey, Workshop, and Risk Response

If authorisations under the Act are given, and prior to works commencing, a survey of the condition of all known sites within the Application Area will be undertaken by a heritage consultant. An offer will be made to SEAFG for representatives to participate.

Prior to the survey, a meeting on the proposed survey will be provided, so that SEAFG members can understand and provide feedback for the proposed survey.

A focus for the survey should be to confirm or estimate the boundary of each known site, to the extent practicable.

Following the survey, a workshop should be undertaken with the Applicant's key personnel, SEAFG, and the heritage consultant, to outline the specific heritage management protocols for each site. The results of the survey should inform:

- the risk or knowledge of impacts to heritage
- site specific protection or mitigation measures for each site, alongside feedback from SEAFG and the heritage consultant, and in accordance with the protocols and procedures adopted under the August 2025 CHMP.
- site rehabilitation and monitoring measures for each site, alongside feedback from SEAFG and the heritage consultant.

The CHMP is intended to be further updated upon completion of the site condition survey and workshop referenced above.

Proposed site avoidance and buffer zones

Prior to any ground-disturbing works, all avoided heritage sites with the exception of NC 11 must be fenced with semi-permanent non-destructive fencing, such as heavy-duty welded mesh panels, with a 5 m buffer from the outer extent of the recorded boundary or the extent of visible heritage associated with the site (whichever is larger). A map showing the location of the Aboriginal sites is to be displayed prominently in the site office during the construction phase of the Project.

The fencing will form a boundary between the known Aboriginal heritage site buffer zone and the impact zone for the duration of construction, to be replaced with

permanent fencing for operations. NC 11 will be managed through a restricted zone because the site is located away from any intended construction and operations.

The maps at Attachment 5 show the 5 m buffer that would be applied to various sites intersecting the Application Area.

As stated above, the maps at Attachment 5 show that Project elements will impact the avoidance buffers proposed for GP 5 (Site 6823-7080), NC 4 (Site 6823-7933) and NC 9 (Site 6823-7939). However, the Applicant has advised that, where the buffers intersect conceptual golf course elements, those elements will be refined or relocated to ensure that no construction or operational activities occur within Aboriginal site boundaries or their respective buffer areas.

Proposed treatment of impacted sites

Known Aboriginal sites within the impact zone are intended to be archaeologically recorded, salvaged, stored and excavated as required. Permanent fencing is intended where the site intersects the impact zone, with perimeter fencing installed around the remainder of the site with a 5 m buffer. A 'restricted zone' will be established for the remainder of the site for ongoing operations.

Other CHMP provisions

- SEAFG will be invited to nominate a Project heritage management coordinator for the Project
- SEAFG monitors will be engaged during fencing installation and de-installation; ground-disturbing works; vegetation clearance; site excavation and periodic site inspections during operations
- acknowledgement that there is a high risk of discovering unknown Aboriginal heritage, including Aboriginal ancestral remains during construction given the large number of Aboriginal sites and objects that have been identified throughout the Application Area and surrounding areas
- implementation of a stop work/heritage discovery protocol in line with the Act and any conditions of authorisation that are imposed
- AAR's Aboriginal Heritage Discovery Protocols are appended to the CHMP, with compliance with specific provisions referred to within the CHMP (see Attachment 6 for a standalone copy of AAR's Aboriginal Heritage Discovery Protocols)
- the recording of the condition of each site post-construction with collaboration from SEAFG
- heritage inductions and cultural awareness training
- dispute resolution provisions
- a remuneration framework.

Stenhouse is intended to direct the heritage management protocols and procedures for the proposed Project.

The CHMP will be amended as required to ensure compliance with any conditions of authorisation should they be imposed.

Consideration of a proposed cultural centre has been removed from the Project and the CHMP on the advice of SEAFG members.

CONSULTATION

Before considering whether to grant any authorisation under the Act in relation to the Project, section 13 of the Act requires the Minister (or their delegate) to take all reasonable steps to consult with the State Aboriginal Heritage Committee, Traditional Owners, and any other Aboriginal parties that they consider may have an interest in the matter.

Under section 14 of the Act, the Minister (or their delegate) may grant an authorisation subject to conditions that they consider appropriate. As a relevant interested Aboriginal party, you are invited to make a submission on the Project including any conditions you would like to see placed on any authorisation.

The consultation period closes on Tuesday 8 December 2026.

This consultation information pack provides information about the Project and has been sent to you as an Aboriginal personal who may have an interest in the area.

Aboriginal Community Consultation Meeting

An Aboriginal Community Consultation Meeting will be held for Traditional Owners and any other interested Aboriginal parties **at 3:00 pm on Thursday 26 November 2026 at the Hotel Panorama, 625 Goodwood Road, Panorama SA 5041**. Light refreshments will be provided.

To RSVP to attend the Aboriginal Community Consultation Meeting, please call either (08) 8363 8622 or 8462 1814, or email aar.heritagesubmissions@sa.gov.au.

Individual group meetings

The Aboriginal community consultation meeting is one opportunity for Traditional Owners and other interested Aboriginal parties to make submissions on the Project. Upon request, AAR will consider hosting additional meetings with Traditional Owners or other interested parties. Should your organisation or family wish to arrange an

individual, private meeting to discuss the Project with AAR staff, please contact AAR using the details provided below.

Invitation for submissions from Traditional Owners and interested Aboriginal parties

Submissions are now invited from all Traditional Owners and interested Aboriginal parties about the Project and the application for authorisations. Submissions may be lodged at any time through to the **consultation closing date of Tuesday 8 December 2026**.

Aboriginal people and organisations may make a submission to AAR in person, or by phone, letter or email.

Anyone who receives this consultation information pack is encouraged to make a submission and to share the pack with other Aboriginal parties who may have an interest in the Project. This consultation information pack is also available online at agd.sa.gov.au/heritage-applications.

All Aboriginal people and organisations 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:

Joanne Fleer
Acting Principal Project Officer (Heritage), AAR
Mail: GPO Box 464, ADELAIDE SA 5001
Email: aar.heritagesubmissions@sa.gov.au
Telephone: (08) 8363 8622

Ren Aubrey
Senior Project Officer (Heritage), AAR
Mail: GPO Box 464, ADELAIDE SA 5001
Email: aar.heritagesubmissions@sa.gov.au
Telephone: (08) 8462 1814

Consultation considerations

Section 13 of the Act requires the Minister (or their delegate) to consult with relevant Aboriginal people about all applications to impact Aboriginal heritage. Under section 14 of the Act, the Minister (or their delegate) may grant an authorisation subject to conditions that they consider appropriate. As such, the consultation process does not only seek the views of interested groups about authorisation to impact heritage but also allows Traditional Owners to propose conditions on heritage management.

When making a submission, Aboriginal people and organisations should consider and respond to the following questions:

1. **What are your views on the authorisations the Applicant is seeking?**
2. **If the authorisations were granted, would you seek that the authorisations be conditioned in any way? Please provide example conditions.**
3. **What are your views on the Project proceeding as proposed, including:**
    - **The impacts to Aboriginal heritage that are proposed?**
    - **The proposed protection and management of Aboriginal heritage?**
4. **Do you have any other views you wish to share with the Minister (or their delegate) before the application is decided?**

AAR is available to assist you to record a submission, answer questions or provide further information about the application at any time prior to the **consultation closing of Tuesday 8 December 2026**.

How your submission will be used

All submissions will be forwarded to the Applicant for response, should it choose, unless you request that any cultural information you have provided be kept confidential. 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, all submissions and the Applicant's responses to them (if any) will be provided to the Committee, and the Committee's advice will then be sought. This advice, along with all consultation submissions and the Applicant's responses to them, will be provided to the Minister (or their delegate) to assist them to decide about the application. All parties who have made a submission will be personally notified of the application outcome.

Thank you for taking the time to consider this document. If you are a Traditional Owner or an interested Aboriginal party, AAR encourages you to make a submission.

Attachments

- Attachment 1: Map of the Application Area
- Attachment 2: Nora Creina Golf Course Masterplan (13 March 2019)
- Attachment 3: Map of the Application Area, the Project layout (based upon the 15.02.2022 Clearing Plans) and the known Aboriginal sites
- Attachment 4: Map of approximate survey coverage - Wood (2006) and Nicholson (2015)
- Attachment 5 – Maps showing various sites and Project elements using closeup imagery
- Attachment 6: AAR's Aboriginal Heritage Discovery Protocols

Sections 21 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_001
Compiled:	15/01/2026

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.

Nora Creina Golf Resort

Robe, South Australia



Golf Course Masterplan

LEGEND

1	Cattle farm	**4**	Clubhouse
2	Vineyard	**5**	Retreat
3	3-5 star accom	**6**	7-star villa

0 25 50 100 200 300 400

SCALE 1:4000

NORA CREINA GOLF RESORT

Scale: 1:4000 @ A1

Client: J & D Scanlon

Date: 13 March 2019

Revision: For Approval

Golf Course design by:
harrison golf PTY LTD
Harrison Golf Pty Ltd
Suite 1002, 275 Alfred Street
North Sydney NSW 2060

Copyright: Harrison Golf Pty Ltd

Sections 21 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department

Big Dip Lake
Errington Hole Track
Errington Hole Midden – (Site 6823-2633)
Karinya
Nora Creina Road
Errington Hole Lake
Errington Hole
NC 12 (Site 6823-7942)
GP 4 (Site 6823-7079)
GP 3 (Site 6823-7078)
GP 1 (Site 6823-7076)
Dolly Lake
GP 5 (Site 6823-7080)
Pud Lake
NC 8 (Site 6823-7937)
German Point
NC 9 (Site 6823-7939)
NC 10 (Site 6823-7940)
NC 7 (Site 6823-7936)
NC 1 (Site 6823-7930)
NC 2 (Site 6823-7931)
NC 3 (Site 6823-7932)
NC 4 (Site 6823-7933)
NC 5 (Site 6823-7934)
NC 6 (Site 6823-7935)
NC 11 (Site 6823-7941)
The Boundary

Mount Gambier

Application Information
- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements

AAR Heritage Sites
- Determined
- Listed

Roads / Localities
- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500
Metres

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: 2026008_002a
Compiled: 15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

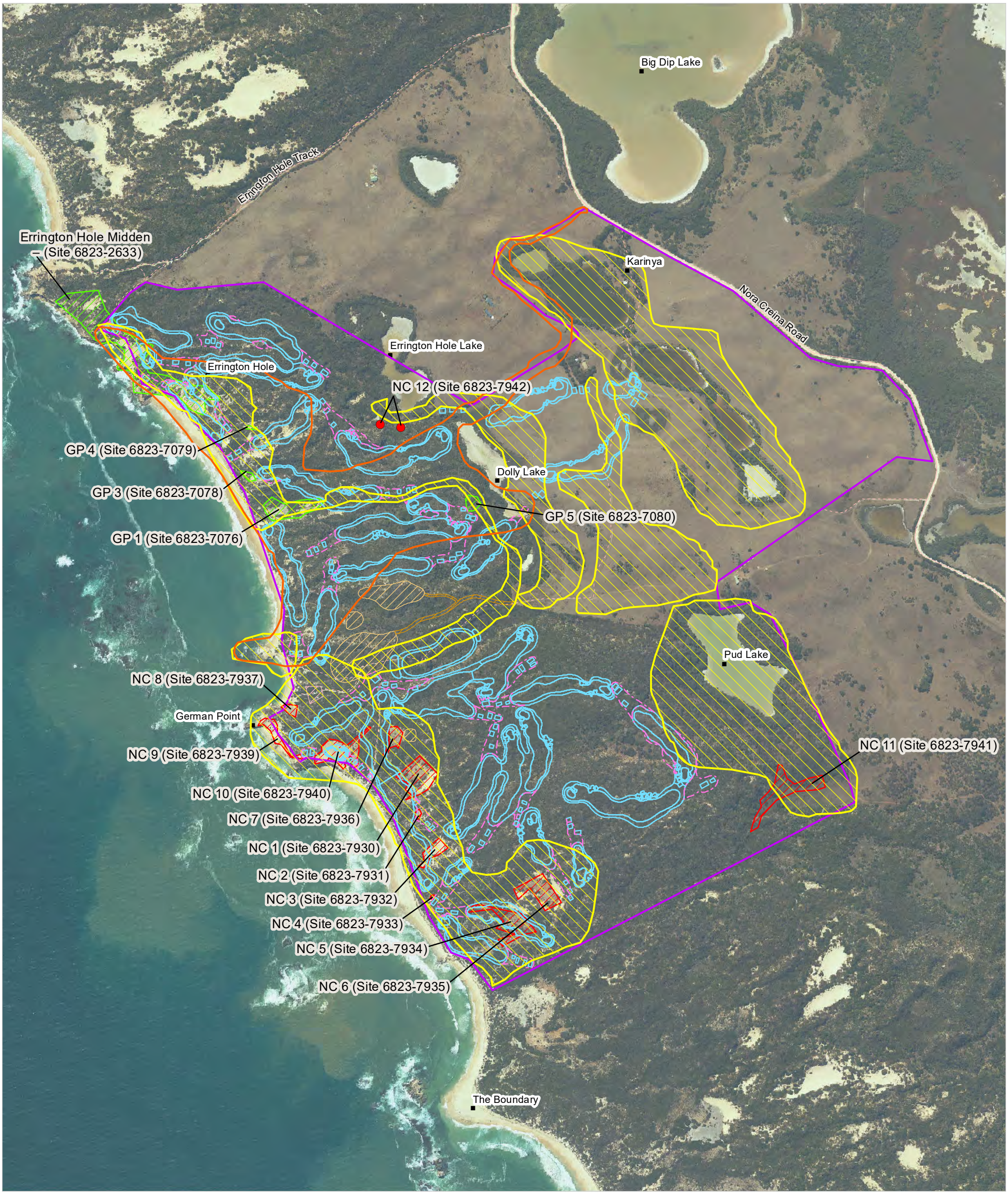
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

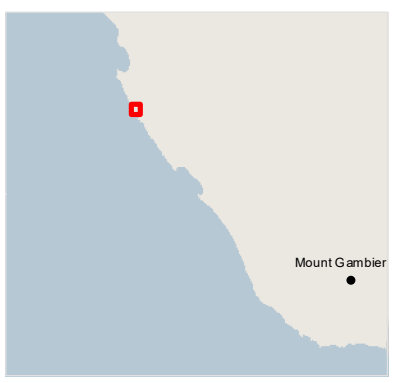
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information
- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements

Approximate Survey Extents
- 2006 Survey Extent
- 2015 Survey Extent

AAR Heritage Sites
- Determined
- Listed

Roads
- Minor
- Track

Localities
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500
Metres

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: 2026008_010
Compiled: 15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

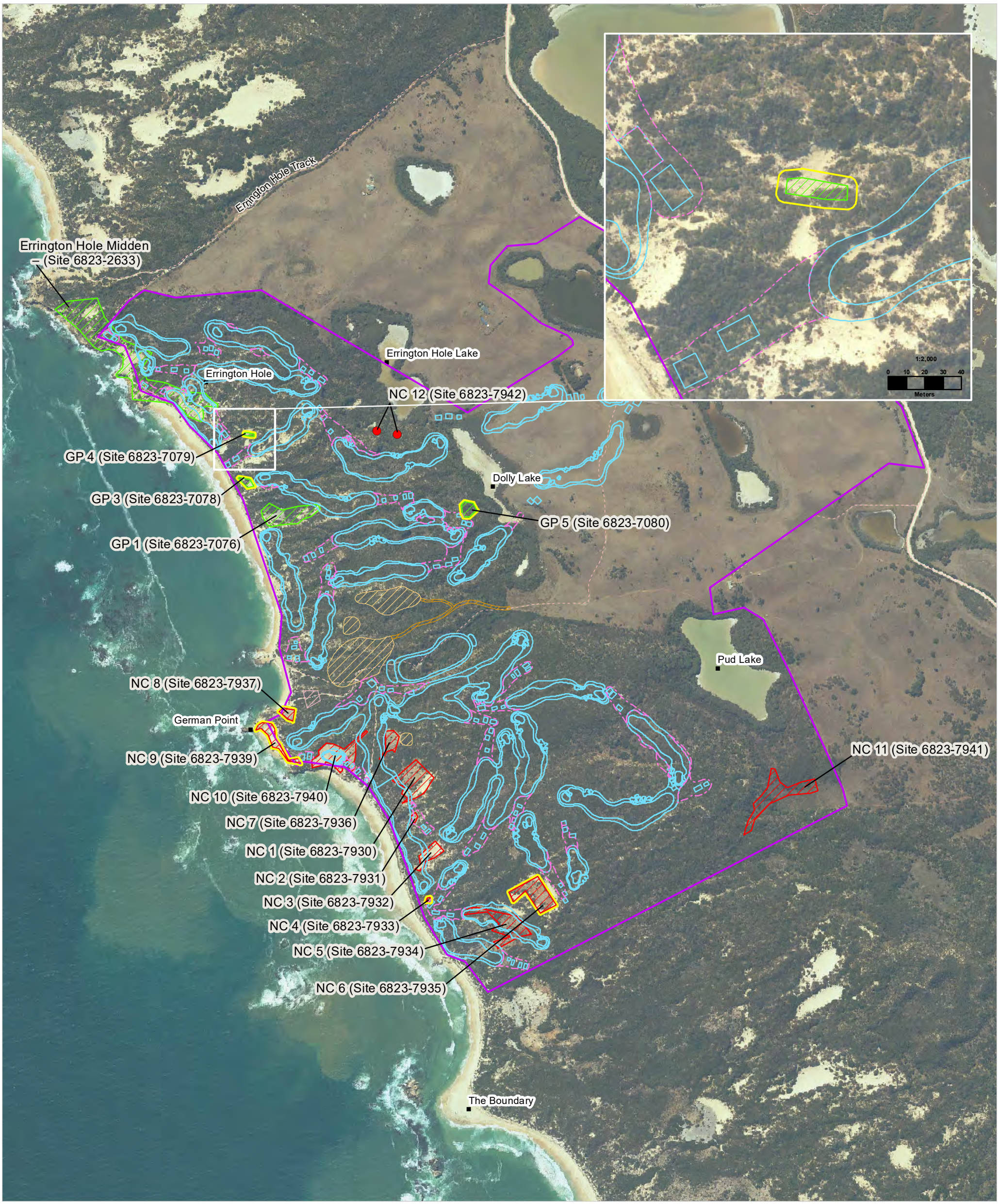
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites

- Determined
- Listed

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_003
Compiled:	15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

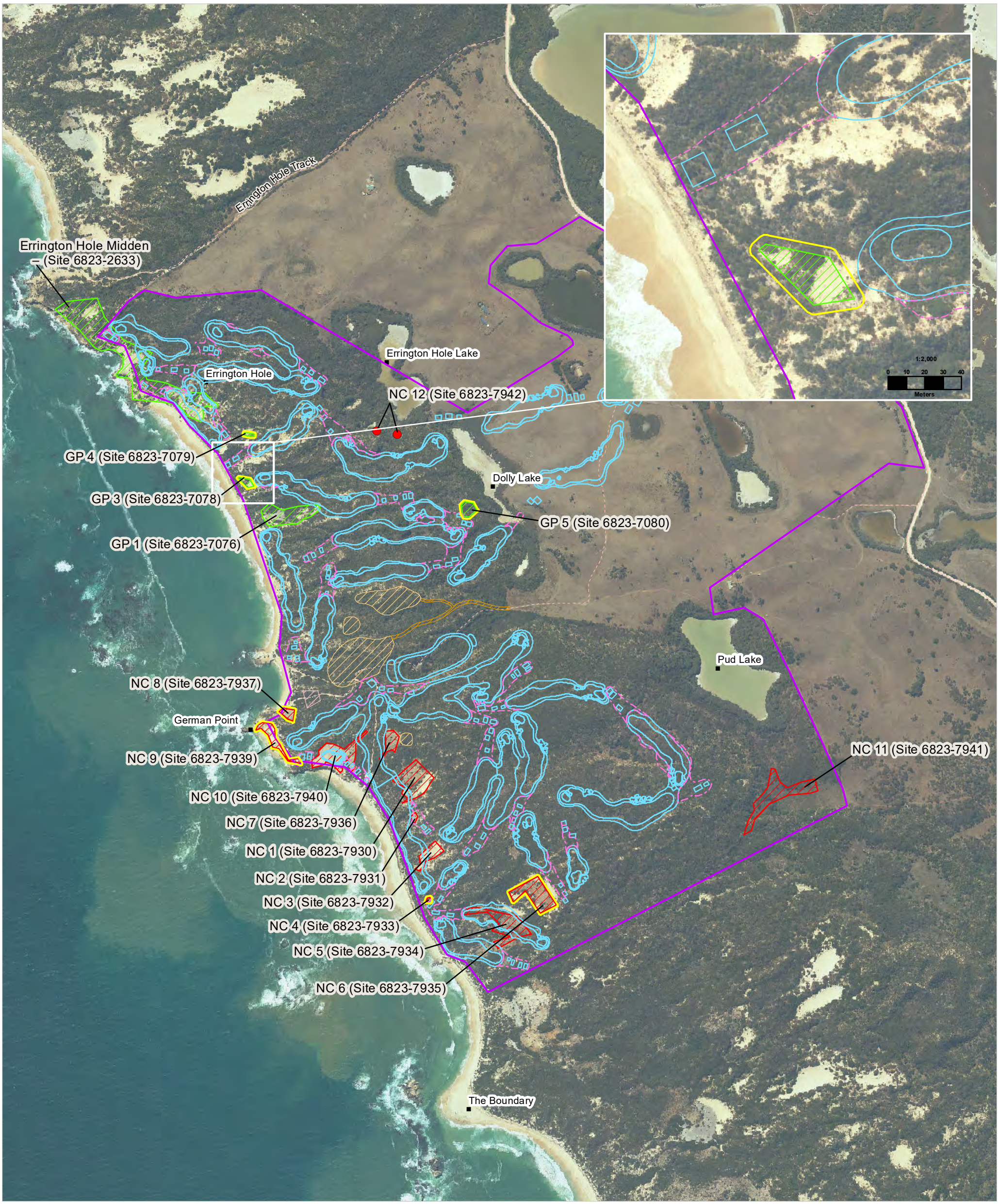
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

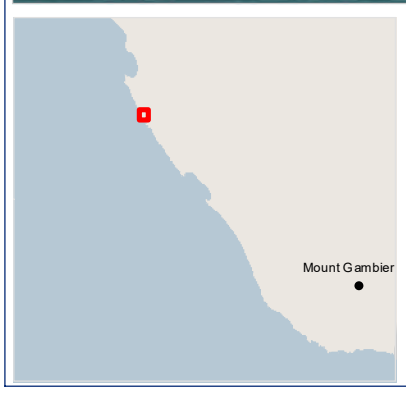
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites

- Determined
- Listed

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_004
Compiled:	15/01/2026

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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department

Errington Hole Track
Errington Hole Midden – (Site 6823-2633)
Errington Hole Lake
Errington Hole
NC 12 (Site 6823-7942)
GP 4 (Site 6823-7079)
GP 3 (Site 6823-7078)
GP 1 (Site 6823-7076)
Dolly Lake
GP 5 (Site 6823-7080)
Pud Lake
NC 8 (Site 6823-7937)
German Point
NC 9 (Site 6823-7939)
NC 10 (Site 6823-7940)
NC 7 (Site 6823-7936)
NC 1 (Site 6823-7930)
NC 2 (Site 6823-7931)
NC 3 (Site 6823-7932)
NC 4 (Site 6823-7933)
NC 5 (Site 6823-7934)
NC 6 (Site 6823-7935)
NC 11 (Site 6823-7941)
The Boundary

1:2,000
0 10 20 30 40
Meters

Mount Gambier

Application Information
- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites
- Determined
- Listed

Roads / Localities
- Minor
- Track
- Localities

NORA CREINA

N

1:12,000
0 125 250 375 500
Metres

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: 2026008_005
Compiled: 15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

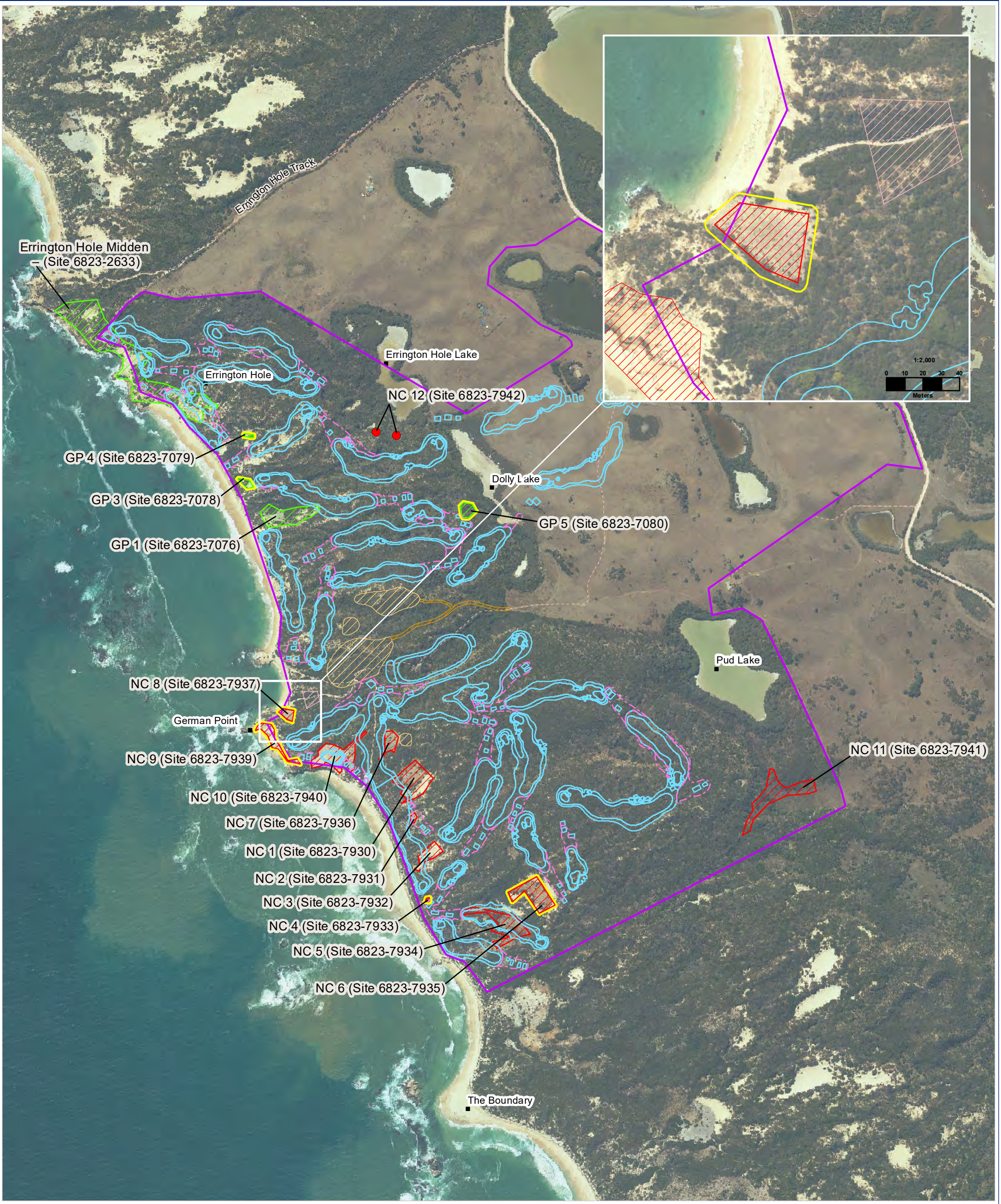
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

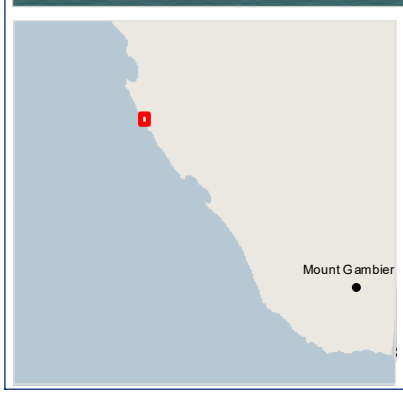
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information
- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites
- Determined
- Listed

Roads / Localities
- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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: 2026008_006
Compiled: 15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

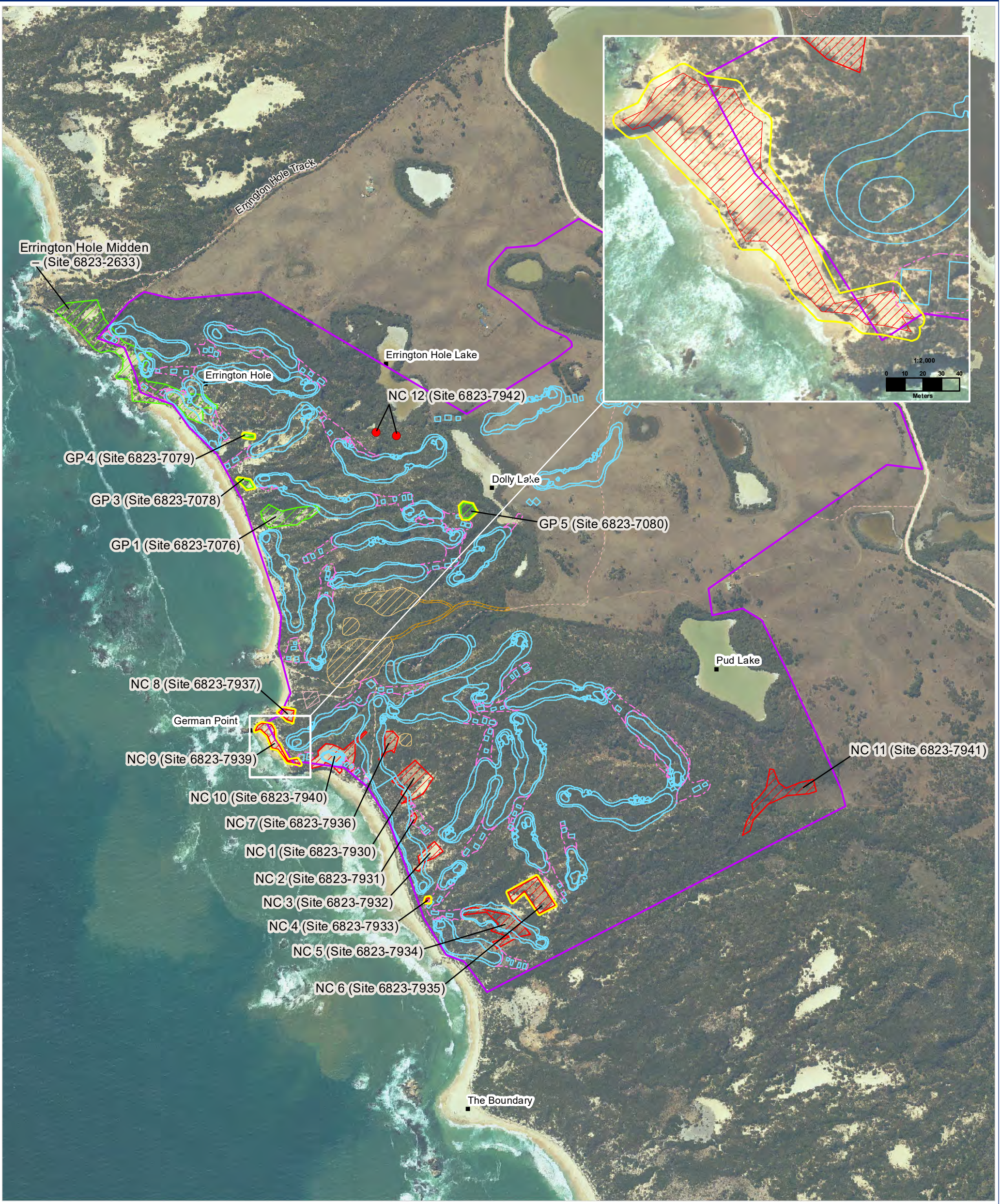
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

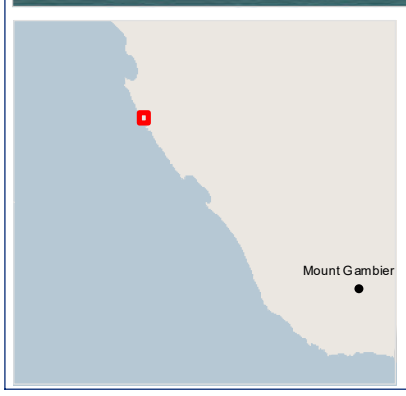
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites

- Determined
- Listed

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_007
Compiled:	15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

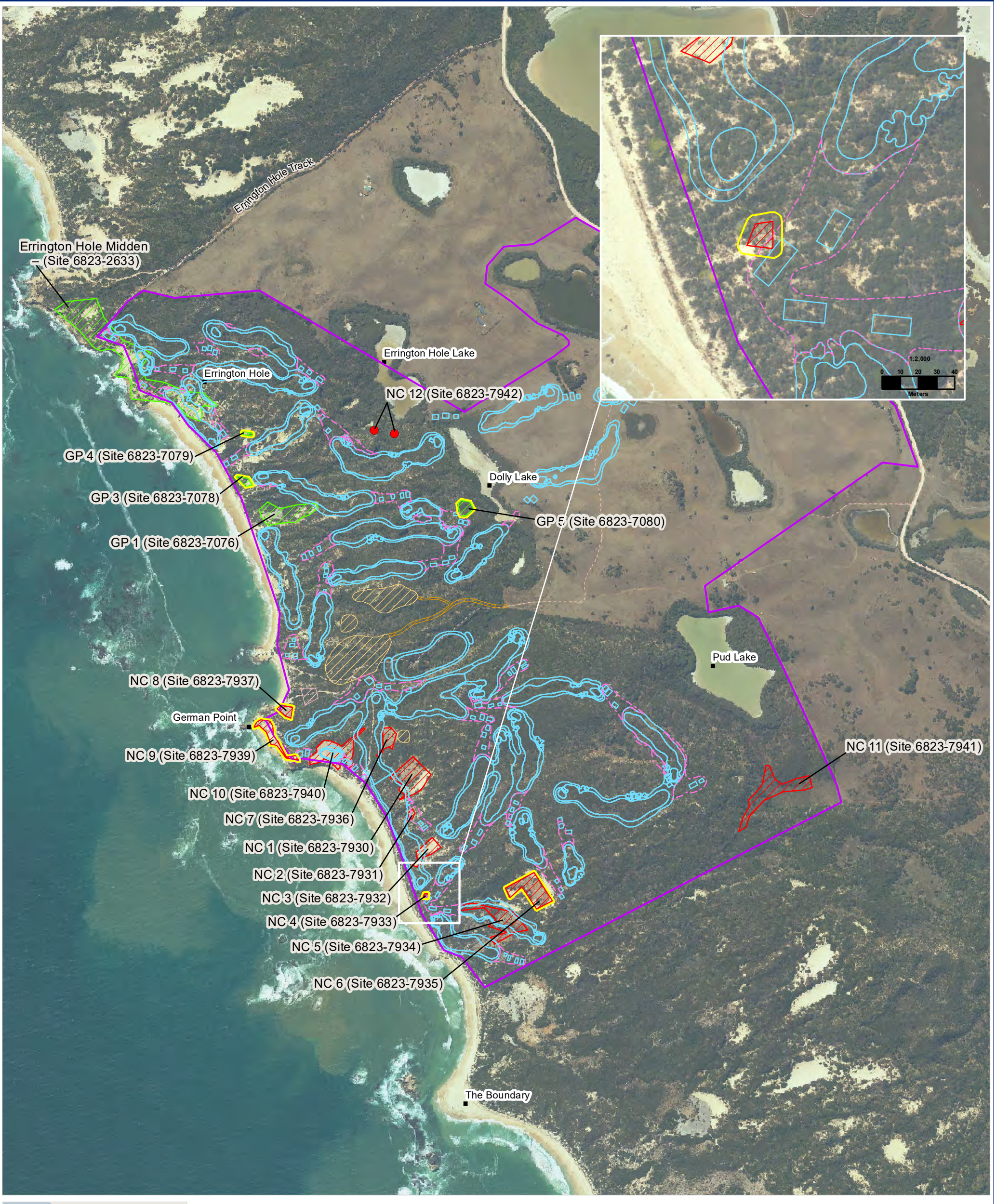
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

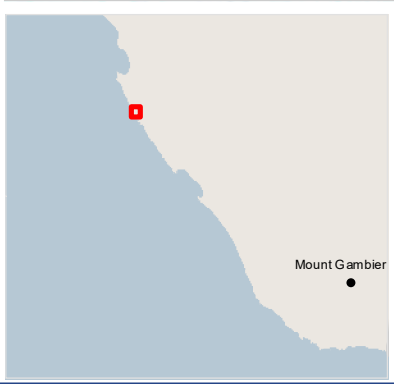
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites

- Determined
- Listed

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_008
Compiled:	15/01/2026

Information derived from AAR's central archives is confidential under section 10 of the Aboriginal Heritage Act 1988 (SA).

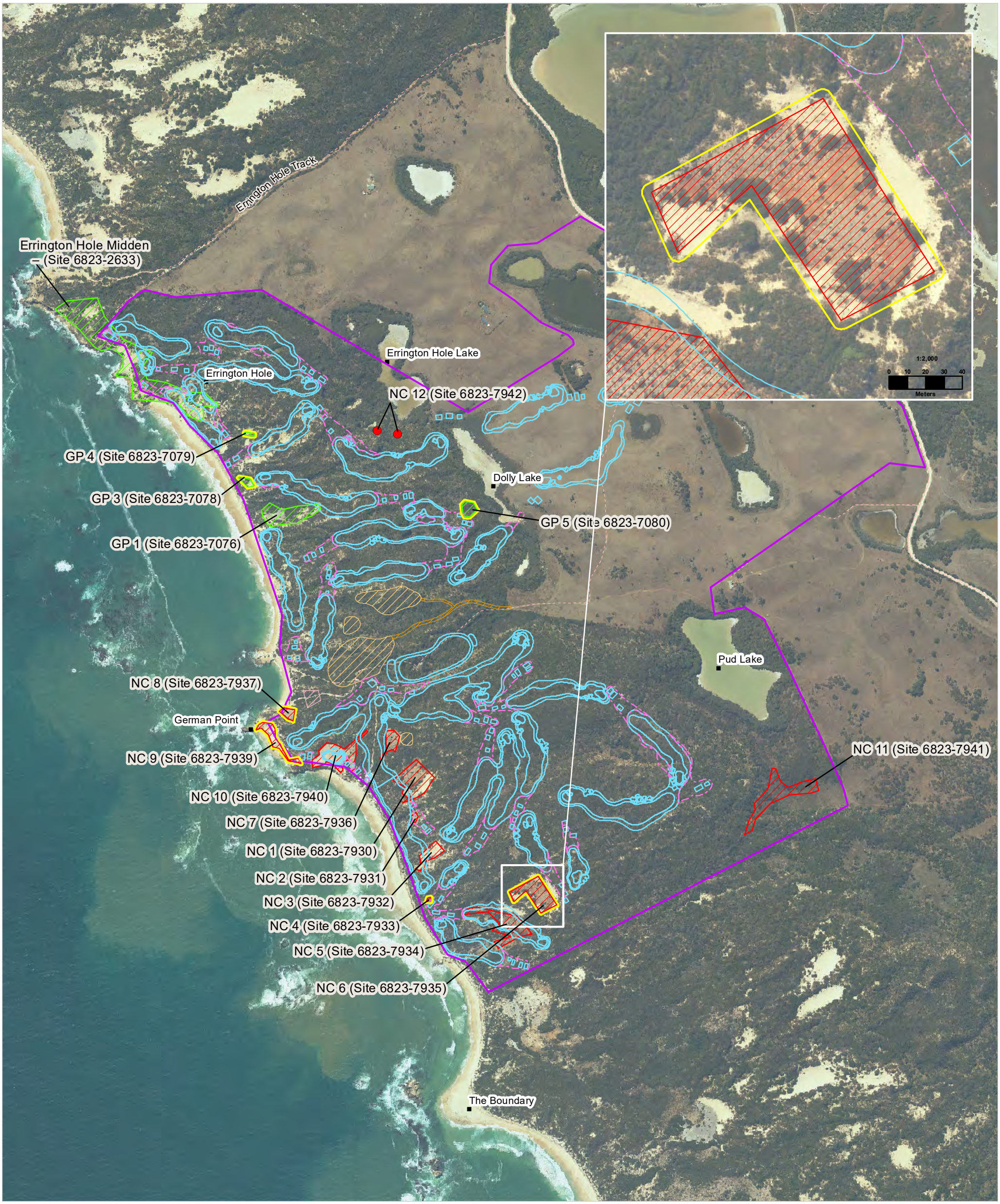
AAR's central archives are not a comprehensive record of all Aboriginal heritage and other sources of heritage information may exist. The positional accuracy of this data is variable and dependent on the accuracy of information provided to AAR at the time of recording. The full geographic extent of Aboriginal heritage sites may not be depicted and sites may be larger than they appear on the map.

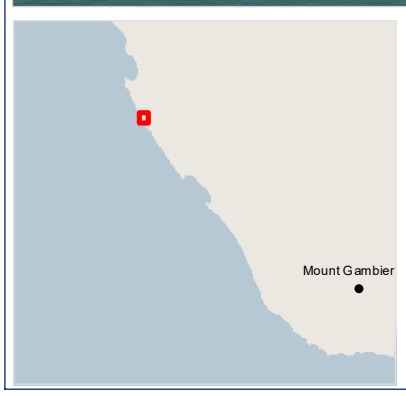
This map has been produced using information supplied by third parties. Whilst all reasonable care has been taken in the preparation of this information, AAR is not able to warrant its accuracy and accepts no responsibility for the loss, injury or any other liability incurred by any person that arises 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 and 23 Application Area – Nora Creina Golf and Tourism Resort Project

Government of South Australia
Attorney-General's Department





Application Information

- Application Area
- Natural Carry Zones
- Infrastructure Boundaries
- Internal New Road
- Wellness Retreat
- Golf Course Elements
- Buffer Regime for Avoided Sites

AAR Heritage Sites

- Determined
- Listed

Roads / Localities

- Minor
- Track
- Localities

NORA CREINA

N

1:12,000

0 125 250 375 500

Metres

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:	2026008_009
Compiled:	15/01/2026

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.

Aboriginal Sites Discovery Protocol

Attachment 6

***Pursuant to sections 20A(1), 21(2) and 23(3) of the Aboriginal Heritage Act 1988* (SA)**

- The purpose of this document is to provide a 'stop – notify – manage' process.
- Where impacts to Aboriginal sites are unavoidable, they should be mitigated to the extent possible.
- For discoveries of Aboriginal objects that do not form part of an Aboriginal site, refer to the Authorisation.
- Aboriginal parties are Traditional Owners and/or Aboriginal organisations specified by AAR for the purposes of the Authorisation.
- Defined terms in the Act and the Authorisation have the same meaning in this protocol.
- If there is any disagreement about the application or interpretation of this protocol, or any part of it, AAR will definitively decide the matter.

Discovery of suspected Aboriginal site OR new information about an Aboriginal site

Immediately STOP all activities within the Discovery Zone

- Establish a no-go zone of at least a 3m radius around the visible extent of the discovery (Discovery Zone)
- Isolate all associated spoil/material.

If the discovery includes human remains, follow the ***Aboriginal Remains Discovery Protocol.***

NOTIFY

Notify AAR and the Aboriginal parties of the suspected discovery, giving details of the nature, location and circumstances or new information about an Aboriginal site.

Establish if discovery or new information

Seek the views of the Aboriginal parties, and where possible an archaeologist, on whether the discovery is an Aboriginal site, or if it is new information about a site.

Not a discovery or new information

Resume activities subject to the conditions of the Authorisation.

MANAGE

If you cannot avoid the discovery

- Provide Aboriginal parties and AAR with a method for managing the discovery* and, at the same time, make an offer in good faith to the Aboriginal parties to engage an adequate number of Aboriginal heritage monitors to observe, participate in and provide input into the activities outlined in the method.

Resume activities

- From the date that is five (5) working days after providing the method and making the offer, follow the method to manage the discovery**
- Engage an archaeologist to oversee all heritage management activities as set out in the method
- When, in the reasonable opinion of an archaeologist***, heritage management activities are completed, Project activities may resume or commence.

If you can avoid the discovery

- Consult with the Aboriginal parties on how to best avoid and protect the discovery
- Notify AAR and the Aboriginal parties detailing the measures you will take to ensure that it is avoided and protected.

Resume activities

Activities must avoid the discovery.

*****This method should be prepared by an archaeologist in consultation with the Aboriginal parties. The method must comply with this protocol, the Authorisation and the Act. Guidance may be sought from AAR. AAR may provide feedback on any proposed method, which must be considered by the Authorised Parties.
******AAR may advise in writing that activities may commence earlier.
*******Where there is a dispute about whether heritage management activities are completed, AAR will definitively decide the matter.

Aboriginal Remains Discovery Protocol

Pursuant to sections 20A(1), 21(2) and 23(3) of the Aboriginal Heritage Act 1988 (SA)

- The purpose of this document is to provide a 'stop – notify – manage' process.
- In all cases where human remains are discovered, this must be immediately reported to SA Police. Do not interfere with the remains.
- Human remains must be always treated with dignity and respect.
- Where impacts to remains are unavoidable, this should be mitigated to the extent possible.
- Aboriginal parties are Traditional Owners and/or Aboriginal organisations specified by AAR for the purposes of the Authorisation.
- Defined terms in the Act and the Authorisation have the same meaning in this protocol.
- If there is any disagreement about the application or interpretation of this protocol including the method overpage or any part of them, AAR will definitively decide the matter.

Responsible parties

You - Authorised party

SA Police

Discovery of suspected human remains OR new information about Aboriginal remains

Immediately STOP all activities within the Discovery Zone

- Establish a no-go zone of at least a 5m radius around the visible extent of the discovery (Discovery Zone)
- Isolate all associated spoil/materials.

NOTIFY SA Police*
Call 131 444

SA Police investigation

The Discovery Zone will be under the control of SA Police until notified otherwise.

Animal remains

- If remains are **not** associated with Aboriginal heritage**, the Discovery Zone reverts to your responsibility
- Activities may resume.

Aboriginal remains

- Activities not permitted within the Discovery Zone.
- Take the following steps:

Further investigation required

The Discovery Zone continues under SA Police control.

NOTIFY

Notify AAR and Aboriginal parties of the discovery, giving details of the nature, location and circumstances or of new information about Aboriginal remains.

If you can <u>avoid</u> the Aboriginal remains

- Consult with the Aboriginal parties on how to best avoid and protect the discovery
- Notify AAR and the Aboriginal parties detailing the measures you will take to ensure that it is avoided and protected.

Resume activities

Activities must avoid the discovery.

If you <u>cannot avoid</u> the Aboriginal remains

If activities that may cause impact to the remains are proposed within the Discovery Zone, follow the conditions set out in the Authorisation, and the ***method for managing Aboriginal remains*** (see overpage).

If, after having completing the steps above, discovered remains can be avoided, avoid them.

Resume activities

Activities may only resume once the conditions set out in the Authorisation, and the ***method for managing Aboriginal remains*** (overpage) have been followed.

*If it is new information about previously-reported Aboriginal remains, notification to SA Police is not required

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 Discovery Protocol.

Method for managing Aboriginal remains

Where discovered Aboriginal remains <u>cannot be avoided</u>, or where some impacts to remains will likely occur, an Authorised Party must:

1. Consult with the Aboriginal parties about the proposed management of the remains that may be impacted.
2. Advise AAR and the Aboriginal parties in writing:
    - that you have assessed that avoiding the remains is not reasonably possible
    - of the justification for your decision
    - of the outcomes of your consultation with the Aboriginal parties in deciding how the remains will be managed.
3. Provide Aboriginal parties and AAR with a method for managing the discovery and make an offer in good faith to the Aboriginal parties to engage an adequate number of heritage monitors to observe, participate in and provide input into the heritage management activities outlined in the method. The method should be prepared by an archaeologist in consultation with the Aboriginal parties. The method must comply with this protocol, the Authorisation and the Act and must include the following:
    - careful excavation and removal of soil in layers of no more than approximately 10 cm deep using hand trowel, shovel or small excavator within the Discovery Zone. This excavation must occur until – in the view of an archaeologist – culturally sterile layers or bedrock is reached.
    - provision for an archaeologist to be engaged to oversee all heritage management activities.
4. From the date that is not less than five (5) working days from the date of the provision of the method and making of the offer outlined in Step 3, follow the method to manage the discovery. AAR may advise in writing that heritage management activities may commence earlier.
5. When, in the reasonable opinion of an archaeologist, heritage management activities set out in the method are completed, Project activities may resume or commence.

Note:

- Guidance may be sought from AAR in preparing any proposed method. AAR may provide feedback on any proposed method, which must be considered by the Authorised Parties.
- In the event of a dispute between the parties in relation to whether the heritage management activities are completed AAR will conclusively decide the matter.