



**Mount Lofty Golf Estate
Cultural Heritage Management Plan Framework**

Mount Lofty Golf Estate Cultural Heritage Management Plan Framework

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GLOSSARY AND ABBREVIATION OF TERMS

AAR	Aboriginal Affairs and Reconciliation
AH Act	<i>Aboriginal Heritage Act 1988</i>
CHMP	Cultural Heritage Management Plan
AGD-AAR	Attorney General's Department – Aboriginal Affairs and Reconciliation (formally DPC-AAR)
Guidelines	<i>Guidelines for the Preparation of a Development Report, Mount Lofty Golf Estate</i>
KYAC	Kaurna Yerta Aboriginal Corporation
m	meter(s)
Mount Lofty Golf Estate	Mount Lofty Golf Estate Pty Ltd
n.d.	no date

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1 INTRODUCTION

This Cultural Heritage Management Plan (CHMP) Framework has been prepared in response to the *Guidelines for the Preparation of a Development Report, Mount Lofty Golf Estate* (the Guidelines) (State Planning Commission 2022) to address the issues / impacts of the development, on the cultural heritage of First Nations People. It has been identified in the Guidelines that the proposed development has the potential to impact on sites and places of Aboriginal heritage through disturbance during construction.

The CHMP Framework document sets out in detail how the risk will be managed and the controls that will be implemented to ensure that no damage is caused to Aboriginal heritage during the construction and operational phases of the development.

1.1 Project description

Mount Lofty Golf Estate Pty Ltd (Mount Lofty Golf Estate) is proposing to redevelop the Stirling Golf Course. As part of the redevelopment, they are intending to undertake the following works:

- Hotel - 3-5 level hotel building comprising:
 - 56 hotel suites.
 - 15 x two bedroom serviced apartments.
 - 15 x three bedroom serviced apartments.
 - 2 penthouse serviced apartments.
 - Back of house, plant storage and maintenance areas.
 - A 537m² function room.
 - A 212m² restaurant with 89 m² external terrace.
 - 186m² sports bar.
 - A 189m² gallery and cafe.
 - A 94m² wellness centre with 125m² gym and spa/massage treatment rooms.
- Private retreats – ‘Pods’
 - 17 x one bedroom units.
 - 1 x back of house Service Pod.
- Adaptive reuse of the existing perfumery:
 - Refurbishment of the existing local heritage place to accommodate a multipurpose space for use as café, retail or functions.
 - Extension to the Perfumery to include a covered outdoor dining area.
 - Orchard and perfumery garden plantings to reimagine the former use of the building as a “Scent Factory”.
 - Note: the perfumery building will temporarily house the golf club whilst construction is occurring.
- Golf Course Facilities Building - 2-5 level building comprising:

- Retention of 18-hole golf course with improvements.
- Refurbished function facilities, cart storage and 138m² clubhouse in new building.
- New 97m² pro-shop, administration areas, gym and change rooms.
- Car Parking, Access and Waste Management
 - A total of 200 car parking spaces in two car parking areas.
 - Emergency vehicle access via western entry from Golflinks Road.
 - Main access point via Golflinks Road.
 - Designated service bay for waste collection and service vehicles.
 - Porte cochere and valet area for guests and buses.
 - A separate entry from Old Carey Gully Road to provide maintenance vehicle access and public access to the perfumery building.
 - Designated waste storage areas.
- Subdivision – following construction of the proposed development, it is proposed to divide the site into three (3) allotments:
 - Allotment 532, with an approximate area of 9,924m² together with a right of way 'A', comprising the hotel building and pods.
 - Allotment 533, with an approximate area of 5,056m² together with a right of way 'B', comprising the golf club and facilities building.
 - Allotment 531, with an approximate area of 38.4 hectares, comprising the balance of the golf course, subject to easements 'A' and 'B'.

At the time of preparing this CHMP Framework, the design for the redevelopment had not been finalised. This CHMP framework document has been written with the intent that it will be valid, irrespective of the final design of the development.

1.2 Project location

The Stirling Golf Club is located at 35 Golflinks Road, Stirling South Australia in the Hundred of Onkaparinga, within the Local Government Area of the Adelaide Hills Council, the Landscape Management Region of the Hills and Fleurieu and the Native Title Determination of the Kurna People.

The proposed redevelopment is situated on Certificate of Title 5891, Folio 805 (Allotment 53 in Deposited Plan 59212) and is boarded to the east by the Mount George Conservation Park and to the west by Old Carey Gully Road. Refer to Appendix 1 for a map of the project area.

1.3 Purpose of the CHMP Framework

The purpose of the CHMP Framework is to:

- Demonstrate the commitment by Mount Lofty Golf Estate to consulting and working with the Kaurna Yerta Aboriginal Corporation (KYAC), the registered native title body corporate for the Kaurna people.
- Ensure Mount Lofty Golf Estate meets its statutory obligations under the *Aboriginal Heritage Act 1988* (AH Act) in relation to the management and protection of Aboriginal cultural heritage.
- Demonstrate the measures that will be implemented to manage and protect Aboriginal cultural heritage in the pre-construction, construction, and operation phases of the project.
- Demonstrate the cultural heritage stop work / discovery and reporting procedures should Aboriginal heritage be identified during either the construction or operational phases of the project.

2 SCOPE OF WORKS

The redevelopment of the Stirling Golf Club and Golf Course is anticipated to be undertaken using a combination of traditional construction methods together with less invasive measures like the Surefoot™ concrete free footing system. The essential pre-construction, construction and operational phase activities are set out in sections 2.1, 2.2 and 2.3 respectively.

Mount Lofty Golf Estate acknowledge that despite best efforts to identify and avoid Aboriginal heritage sites, a risk remains that on-ground works could result in damage, disturbance or interference to Aboriginal heritage sites, objects and ancestral remains which are protected by the AH Act. To ensure protection of any Aboriginal cultural heritage, mitigation measures will be documented in the CHMP and be implemented by Mount Lofty Golf Estate staff, contractors and sub-contractors during all phases of the project.

2.1 Essential pre-construction activities

The AH Act does not mandate a requirement for a cultural heritage survey where there is a low likelihood of disturbance to Aboriginal heritage. The cultural heritage desktop assessment (EBS 2021) identified that there was a low likelihood of disturbance to unknown Aboriginal heritage, therefore a cultural heritage survey has not been undertaken at this stage of the project design.

The following preconstruction activities were undertaken prior to the development of this CHMP Framework:

- Geotechnical sampling,
- Flora and Fauna Survey, and
- Arborist Survey.

2.2 Essential construction activities

The following essential construction activities are anticipated to be undertaken during the redevelopment of the project area:

- Establishment of new roads and car parking facilities,
- Vegetation clearance and earthworks at new hotel building, 20 private retreats (pods) and one service pod,
- Pouring of concrete footings for new clubhouse facility and pro-shop, administration areas and change rooms,
- Upgrades to current 18-hole golf course,
- Land clearance and earthworks for the refurbishment, and expansion of the Local Heritage Place,
- Landscaping and establishing a perfumery garden and orchard,
- Establishment of associated temporary facilities,

- Establishment of fire protection infrastructure,
- Establishment of waste facilities,
- Storm water management,
- Clean up of waste materials and rehabilitation of temporary areas of disturbance,
- Repurposing dam for stormwater management, and
- Alteration on current electrical infrastructure and establishment of new onsite transformer.

2.3 Essential operational activities

The following essential operational activities are anticipated to be ongoing after completion of the redevelopment:

- Maintenance of the hotel building, private retreats and service pod,
- Maintenance of the golf course and gardens,
- Maintenance of fire protection infrastructure,
- Maintenance of roads and car parking facilities,
- Maintenance of onsite wastewater treatment,
- Maintenance of electricity transformer, and
- Continued refuse collection, deliveries and other hotel servicing.

3 ABORIGINAL CULTURAL HERITAGE

There is one Aboriginal site protected under the AH Act within 1000 metres (m) of the project area (Appendix 2). The registered site is on the western side of Carey Gully Road, opposite the northern end of the golf course near Hole 10 and therefore out of the project area. Given the distance of the site from the project area, construction during the proposed development will not disturb this known site.

There are no Aboriginal places listed in the Australian Heritage Database within, or near to the proposed project area.

3.1 Risk assessment

Given that many sites and objects have previously been recorded throughout the Adelaide Hills, it would normally be anticipated that construction works would pose a high likelihood that unknown Aboriginal sites or objects of Aboriginal significance would be disturbed during construction. Only one site of Aboriginal significance however was identified within 1000 m of the project area, and none recorded in the golf course.

Geotechnical sampling showed that there is a fill layer of between 0.20 m and 0.35 m across most of the site, meaning that it is unlikely that Aboriginal artefacts would be found within the project area, on the surface and in situ. Under the fill layer is topsoil which on average is a depth of between 0.10 m and 0.30 m. The layer directly under the topsoil and through to the bedrock, was predominately high plasticity clay which is generally heavy and difficult to dig into. These results reinforce that the likelihood of disturbing ancestral burials or other Aboriginal cultural items is low, as aboriginal artefacts are generally found in sandy or gravelly soils not in compacted clays.

During construction of the Mount Lofty Golf Course, groundwork activities however may inadvertently disturb previously undiscovered sites of Aboriginal cultural significance. Table 1 outlines mitigation and management controls that will be implemented to avoid and / or minimise impacts to Aboriginal cultural heritage values.

Table 1. Aboriginal cultural heritage mitigation and management controls.

Aspect	Detail
Objective	<ul style="list-style-type: none"> Avoid or minimise the impacts of construction, operation, and maintenance of the project on Aboriginal sites, objects of significance or remains.
Management Strategy	<ul style="list-style-type: none"> Minimise any heritage impacts within the construction footprint, and to avoid impacts outside of the construction footprint.
Legislation and other guidance	<ul style="list-style-type: none"> <i>Aboriginal Heritage Act 1988</i> (SA) Discovery of Aboriginal Sites and Objects Fact sheet (Department of Premier and Cabinet – Aboriginal Affairs and Reconciliation (DPC-AAR), n.d.) Project Planning and Aboriginal Heritage Guide (DPC-AAR n.d.)
Potential impacts	<ul style="list-style-type: none"> Damage, disturbance or interference with areas of Aboriginal cultural heritage significance. Damage, disturbance or interference to identified or unidentified sites, objects or remains.

Mitigation and control measures	<ul style="list-style-type: none"> • Desktop assessment of registered and recorded sites via the Central Archive, including the Register of Aboriginal Sites and Objects, maintained by Attorney General's Department - AAR. • Utilise previously disturbed areas for infrastructure wherever practicable. • Induct all staff and contractors on cultural heritage prior to any onsite construction work. • Undertake a cultural heritage survey with native title claimants, if required. • Develop and implement a Cultural Heritage Management Plan detailing the procedures for the identification, management and protection of Aboriginal cultural heritage sites including monitoring of ground disturbance activities in agreed locations with relevant traditional owner representatives, if required.
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3.2 Cultural heritage surveys – pre-construction phase

Given that the property has been operating as a golf course for 95 years and prior to that for at least 75 years it was used for mixed farming, dairying, iron mining and timber milling, suggests that there is a low likelihood of identifying or disturbing unknown surface Aboriginal sites or objects of significance as fill has been laid down across the site and the topsoil and subsurface layer have previously been disturbed.

The AH Act does not mandate a requirement for a cultural heritage survey where there is a low likelihood of disturbance to Aboriginal heritage therefore a cultural heritage survey was not undertaken prior to the pre-construction activities detailed in section 2.1.

3.3 Monitoring and cultural heritage surveys – construction phase

Following the completion of the detailed design for the project and additional geotechnical sampling, monitoring of ground disturbance activities in certain agreed locations, may need to be undertaken to ensure sites of Aboriginal heritage value are protected.

3.3.1 *Monitoring*

Although it is not a requirement under the AH Act, having Aboriginal Monitors present during ground works may be considered, as it is effective for the early detection of artefacts, objects and burial sites during works. Monitoring involves the continuous observation of earthmoving works to:

- Watch the sediments being excavated to see any change;
- Inspect and sieve the removed soil to ensure that no discoveries go unnoticed; and
- Ensure that harm to any cultural heritage that may be present is mitigated when and where it cannot be reasonably avoided.

Monitoring of earthworks is undertaken until the specified depth required for development is reached or until compact clay or bedrock is reached at which point the chance of encountering archaeological features is significantly reduced.

The requirement for an Aboriginal heritage monitoring program will be assessed once the final design for the project has been completed.

3.3.2 Cultural heritage survey

The AH Act does not mandate a requirement for an Aboriginal heritage survey unless there is a high likelihood of disturbance to unknown Aboriginal sites/objects. The risk assessment undertaken as part of the cultural heritage desktop assessment (EBS 2021) determined that there are no known Aboriginal sites within the project area and the likelihood of the project works disturbing unknown sites is low. A cultural heritage survey is therefore currently deemed unwarranted.

Following the completion of the detailed design for the project, the requirement for a cultural heritage survey will be reassessed.

3.4 Cultural heritage surveys – operations phase

It is unlikely further cultural heritage surveys will be required once the Mount Lofty Golf Estate is operational. Mount Lofty Golf Estate will however manage ongoing compliance with the AH Act in accordance with its operational heritage management system and in consultation with the KYAC.

4 CHMP FRAMEWORK

Mount Lofty Golf Estate does not currently intend to make any application for a Section 23 authority under the AH Act given that there is no known Aboriginal cultural heritage within the project area and the cultural heritage risk assessment has determined that the likelihood of disturbance to unknown Aboriginal cultural heritage is low. Nor does the proponent intend to undertake a cultural heritage survey prior to construction commencing, unless mandated in the Ministers Response Document.

Should any known Aboriginal sites be identified prior to construction or unknown Aboriginal heritage be identified during construction activities, a cultural heritage survey may be warranted and/or requested by the KYAC. A CHMP will then be developed that will include the following information and requirements in relation to the management and protection of Aboriginal cultural heritage during construction and operation of the:

- requirements and responsibilities for all employees, contractors and subcontractors,
- awareness training for all workers to understand cultural heritage considerations associated with the project,
- area-specific site inductions and training,
- protocols for discovery of Aboriginal sites, objects or remains and reporting requirements, in accordance with the AH Act,
- requirements to avoid sites of Aboriginal cultural heritage significance as determined from pre-construction surveys and in consultation with the KYAC,
- Stop work/site discovery procedure if any Aboriginal sites or objects are exposed during construction and engage a suitably qualified heritage consultant and / or appropriate authority to investigate. Work will not continue in that part of the project area until direction has been provided by a suitable authority, and
- exclusion areas to be implemented around sites of cultural heritage significance.

4.1 Pre-construction phase

The AH Act does not mandate a requirement for a cultural heritage survey where there is a low likelihood of disturbance to Aboriginal heritage therefore a cultural heritage survey was not undertaken prior to the pre-construction activities detailed in section 2.1.

4.2 Construction phase

During construction activities, Aboriginal heritage protection and management measures will include:

- ongoing heritage inductions to make all project personnel aware of Aboriginal heritage sites and appropriate management procedures in place to avoid impact,
- monitoring of construction works in higher sensitivity or higher risk locations by KYAC representatives,
- robust measures to address site discoveries during construction,

- where sites are identified during construction, Mount Lofty Golf Estate will aim to relocate works to avoid impact,
- If works are unable to be relocated, Mount Lofty Golf Estate will work closely with the KYAC and the contractor to find a suitable solution in accordance with the requirements of the AH Act,
- at the conclusion of construction Mount Lofty Golf Estate intends to undertake a compliance audit to ensure all heritage management conditions have been met and that that the mitigation measures and controls operated effectively.

4.3 Operations phase

Mount Lofty Golf Estate will manage ongoing compliance with the AH Act in accordance with its operational heritage management system, any CHMP, and in consultation with the KYAC.

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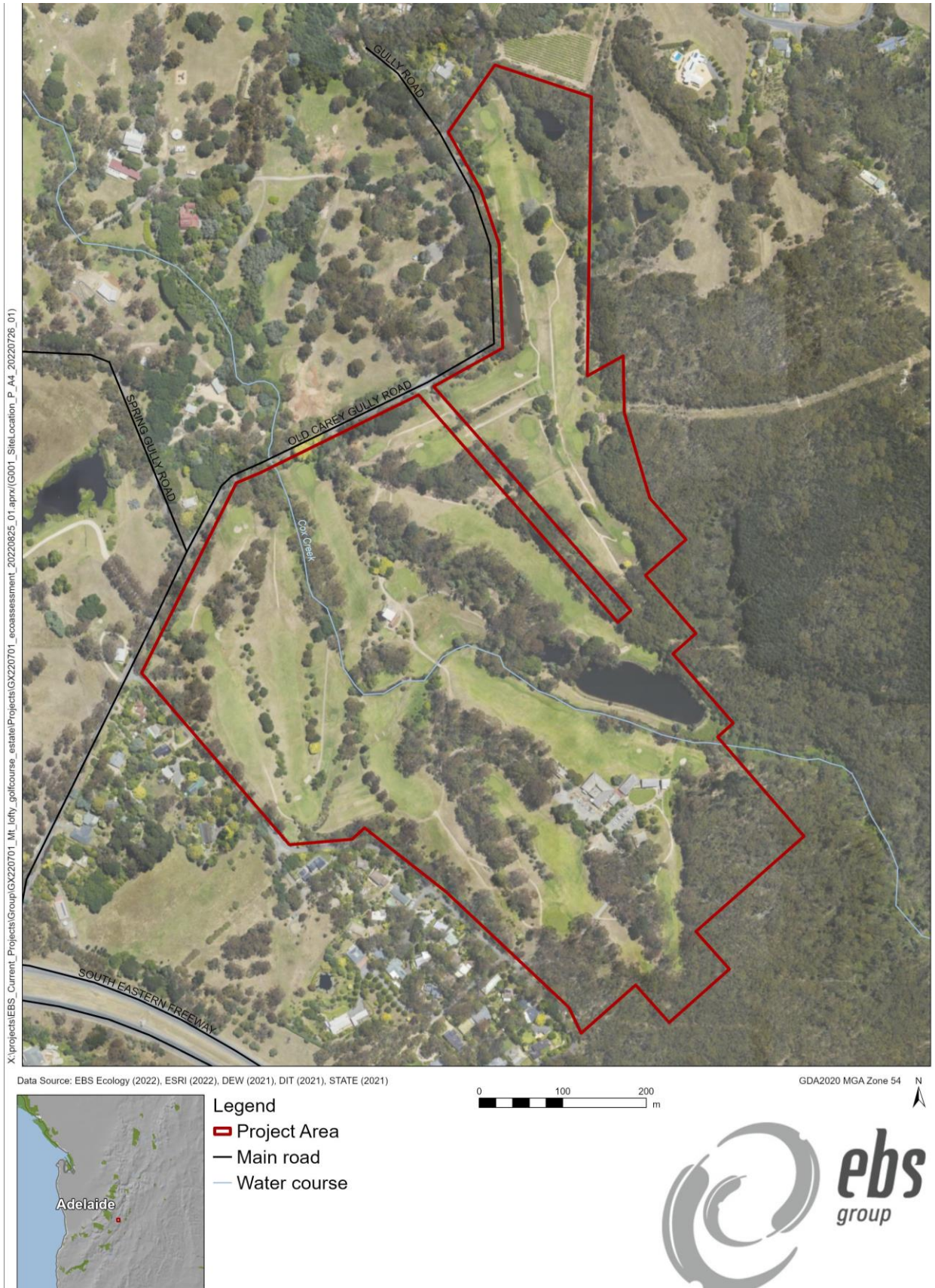
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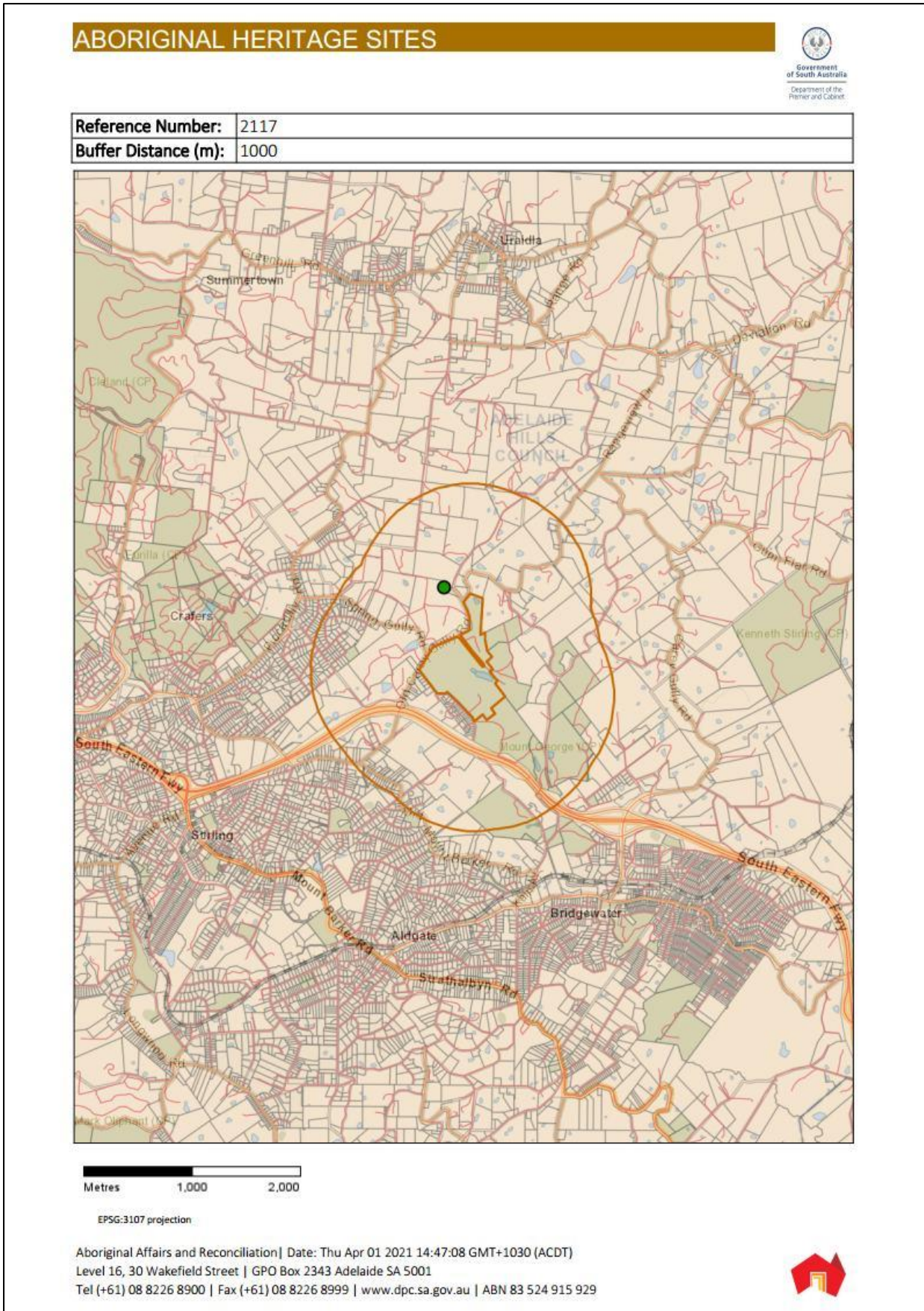
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6 APPENDICES

Appendix 1 – Location of the project area.



Appendix 2 – Location of Aboriginal site in relation to project area.





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