

13 May 2019

The Honourable Stephan Knoll MP
Minister for Planning
Level 12, 136 North Terrace
ADELAIDE SA 5000

Dear Minister Knoll

**Re: Southern Launch – Whalers Way Orbital Launch Complex
Major Development Declaration Request – Section 46(1)**

This correspondence has been prepared on behalf of SouthernLaunch.Space Pty Ltd trading as Southern Launch and referred to hereinafter in this document throughout as 'Southern Launch', as a submission requesting your determination of the proposal herein as a Major Development in accordance with the provisions of sections 46 to 48 of the Development Act.

The development proposal is on land located at the southern tip of the Eyre Peninsula in the area named Sleaford and known as 'Whalers Way', specifically contained with the land below the -34.923 degree line of latitude identified in Certificate of Title Volume 5993 Folio 374.

The State Government has also established the 'Southern Launch Taskforce' comprising members from different government departments and agencies to advise on the proposed development.

The proposed development raises issues of significant environmental, social and economic importance.

Southern Launch has considered the ways in which to proceed and progress the investigations and the approvals required for the development, and has concluded that:

- the specific and unique nature of the of land use and activities incorporated in the scheme, its complexity and state wide significance, and the extent to which the current Development Plan does not incorporate any specific planning policy associated with proposals of such a nature, all suggest a development of significance;
- the current area is zoned as Coastal Conservation and is not compatible, in a policy sense, with the proposed aerospace/rocket launch facility;



- the only State-wide planning policy for Aerospace facilities is contained within the State Strategic Setting module and Remote Areas Zone of the Land Not Within a Council Area, Eyre, Far North, Riverland and Whyalla Development Plan;
- no facility like this has ever previously been built and operated in South Australia;
- the facility will need to be secure and handle National Security classified information, equipment and processes;
- the construction and operation of both traditional and non-traditional rocket launch facilities will have strong environmental considerations;
- large sections of “Whalers Way” are currently under a Native Vegetation Heritage Agreement;
- the facility will need to be designed to handle and store quantities of rocket propellants, some of which might be explosive or have other environmental considerations;
- the construction of the Complex has the potential to disturb the native fauna and flora on the site;
- construction and operation of a rocket launch facility at Whalers Way may generate varying degrees of reaction from the local community, at a State level, and across Australia more broadly;
- and
- the range of environmental and infrastructure issues to be investigated and resolved may not be adequately accommodated through a Ministerial DPA.

We are of the opinion that the most appropriate mechanism for all the issues to be properly assessed and resolved, is for the proposal to be determined as a Major Development in accordance with sections 46 to 48 of the Development Act.

Therefore, Southern Launch formally request that this proposal be declared a Major Development pursuant to Section 46(1) of the Development Act 1993.

In accordance with Section 46(6) the following details are included within this correspondence for the purpose of lodging “An Application” for the proposed Major Development:

- a description of the development;
- the rationale for the proposed development;
- a description of the locality and summary of the contextual setting where the development is to be situated including a legal description of the boundary of the area to be declared and the tenure/ownership of the land;



- an outline of preliminary consultation;
- an outline of preliminary investigations;
- a description of the expected environmental, social or economic effects of the development;
- a statement on how those effects could be managed;
- a statement assessing consistency with any relevant Development Plan and the Planning Strategy; and
- information concerning the application and operation of the Environment Protection Act 1993 with respect to the development.

SOUTHERN LAUNCH PROPOSAL DESCRIPTION: s 46(6)(d)(i)

Southern Launch is proposing to construct the Whalers Way Orbital Launch Complex. A more detailed description of the project is contained in the attached 'Operations Overview'.

The proposal comprises a total of up to eight(8) separate launch pads and associated facilities be constructed on the Whalers Way site.

All of the potential sites will be identified during the Major Project detailed investigations process.

Construction of additional sites is proposed to be incremental and supported or otherwise by a ongoing process of environmental assessment of the impact of rocket launch on the native fauna and flora.

Launch sites will only be located along the southern coastline of the leased area and not into the northern extents of the leased area. The area to the north will form a natural buffer from any unwanted/inadvertent public entry to the site. Due to safety and liability considerations, it is proposed that each launch pad will have its own assembly facility and firing bunker. These will be appropriately spaced based on the current State and Federal explosives and WHS safety requirements.

The current development proposal for the Launch Complex will be undertaken in 4 phases across three of the eight potential sites between 2019 and 2024.

- Phase 1: A permanent launch pad with transportable launch support infrastructure.
- Phase 2: A second permanent launch pad and support infrastructure.
- Phase 3: Replacement of the transportable infrastructure developed under Phase 1 with permanent infrastructure and potentially upgrade the existing launch pad.



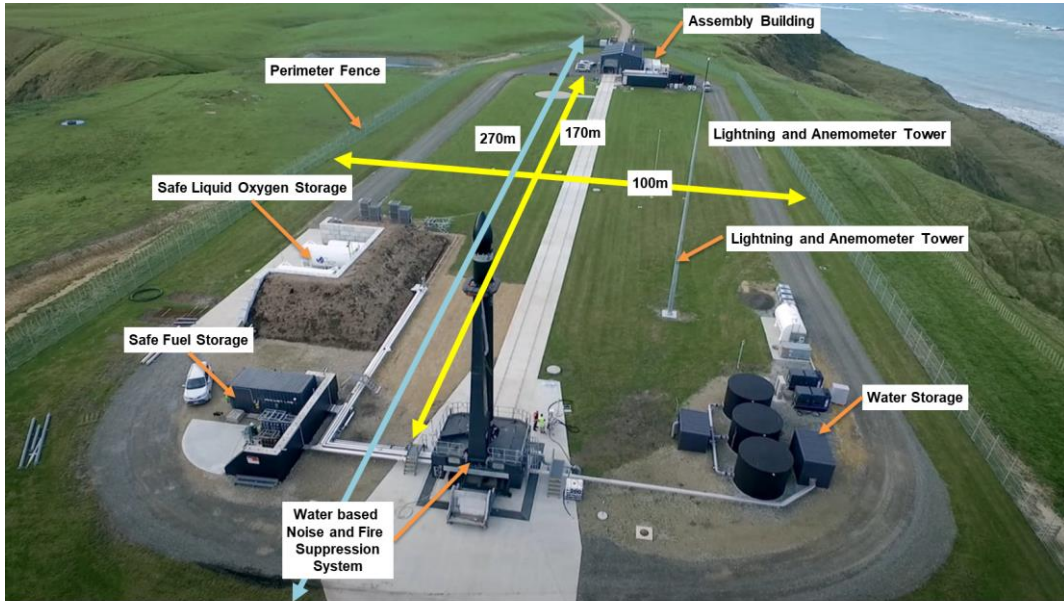
- Phase 4: A third permanent launch pad and launch support infrastructure would be constructed.

Southern Launch is also investigating a non-traditional kinetic launch pad, the construction of which would replace that of a traditional launch pad during one of the proposed Phases above.

The components of the proposed development are comprised of:

- Change of use of land to introduce an aerospace facility in the form of a launch site;
- Construction of buildings and infrastructure, including:
 - Assembly Buildings (temporary and permanent);
 - Diesel Powered Generators;
 - Solar Arrays;
 - Water Tanks;
 - Water Capture and Treatment Systems;
 - Launch Pads;
 - Lightning Rods;
 - Anemometer Towers;
 - Propellant (Liquid, Hybrid and Solid) Storage;
 - Secure Block Houses;
 - Blast Walls;
 - Bunding (for Blast Wave Deflection);
 - Installation of Fibre Optic and Satellite Communication Systems; and
 - Installation of High Voltage Power Lines;
- Construction of internal access roads;
- Land division in the form of a lease extending beyond 5 years; and
- Visitor viewing area facilities.

An annotated image of Rocketlab's Launch Complex 1 at the tip of the Mahia Peninsula in New Zealand is included below. The facility is generally indicative of the proposed launch facilities to be built on Whalers Way with an overall fenced area of 270 metres in length and 100 metres in width, and the Assembly Building located 170 metres from the launch pad.



PROPOSED DEVELOPMENT RATIONAL

Southern Launch seek to establish infrastructure that will support the launch of domestic and international launch vehicles providing the safest and most cost-effective orbital launch site in the world servicing the growing demand for Polar and Sun Synchronous Orbit satellite insertion.

The Whalers Way site has been identified as the preferred site of the launch complex through an extensive review of potential sites across Australia based on the Site Selection Criteria document in Table 1 below.

TABLE 1: Site Selection Criteria

CRITERIA	DESCRIPTION
Latitude	Be between -30 and -40 degrees latitude
Coastal	Be on the coast with unhindered open ocean due South
Weather	Be able to support year-round rocket launches with no regular extremes of temperature
Environment	Not be within the vicinity of endangered marine or terrestrial environments
Population	All human population needs to be a safe distance away from the proposed facility
Workforce	An educated workforce needs to be within 1hr drive of the facility to help support operations
Air Traffic Controllers	Have very little commercial air traffic in the vicinity so that rocket launches can occur frequently



CRITERIA	DESCRIPTION
Shipping Lanes	Have very little commercial shipping in the vicinity so that rocket launches can occur frequently
Large Harbour	In the close vicinity of a commercial harbour to facilitate delivery of rocket hardware and propellants via ship
Large Airport	In the close vicinity of a commercial airport to facilitate air delivery of delicate satellites
Existing Roads	Have suitable roads to the area and preferably through the area
Mainland	Be connected to the Australian mainland to simplify transport
Location Security	Be a peninsula or similar that enables the construction of only one physical boundary (fence) to protect people
Land Size	The available land must be greater than 500Ha to facilitate at least 2 launch pads
Critical National Infrastructure	Not have any critical national infrastructure (oil rigs, etc. within the proposed launch area)
Launch Trajectories	Support launches from 60 degrees wrt the equator out to 180 degrees

The estimated minimum project capital cost for the proposed first transportable launch pad under Phase 1 is AUD\$2,610,000, with an additional AUD\$1,640,000 for salaries, consulting and other costs. The construction of each subsequent permanent traditional launch pad and supporting infrastructure is estimated to cost approximately AUD\$13,000,000.

Construction of all four Phases using traditional launch infrastructure is estimated to cost approximately AUD\$43,250,000 between 2019 and 2024.

IDENTIFICATION OF THE DEVELOPMENT SITE

The subject land is located at the southern tip of the Eyre Peninsula in the area named Sleaford and known as "Whalers Way". The land is located approximately 25 kilometres south-west of Port Lincoln and comprises the whole of the land identified in the following certificate of title:

ALLOTMENT #	PLAN #	HUNDRED	VOLUME	FOLIO
101	71437	Sleaford	5993	374

The subject land has an area of 2,640 hectares and is accessed via Right Whale Road with the site of the complex contained within approximately 1,200 hectares, below the -34.923 degree line of latitude being the subject of the agreed lease.



The green area on the map above is actually the Cape Willes radio station and excluded from the leased area.

It should also be noted that the site does not include the adjacent Crown Land Lot 102 - CR 5993/375 or Coastal Reserve. Any launch site will be a sufficient distance away from the cliff edge to ensure it is outside any wind recirculation zones that might endanger rocket launch events. This recirculation zone occurs within the Crown Land.

The registered proprietor of the land is Theakstone Property Pty Ltd.

SouthernLaunch.Space Pty Ltd have entered into a Commercial Access License (The License) with Theakstone Property Pty Ltd for specified purposes associated with the Southern Launch proposal.

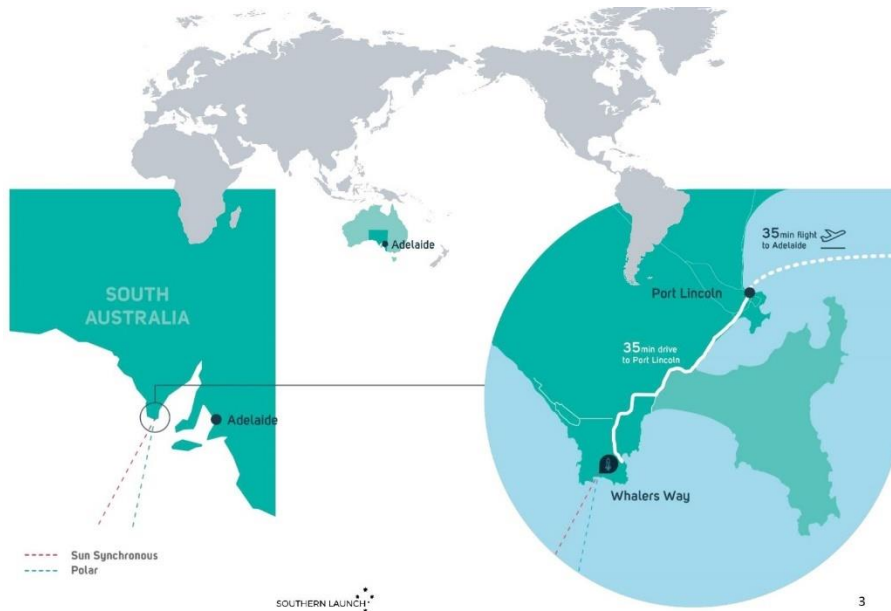
Rocket launch is a potentially dangerous activity with standard exclusion zones covering hundreds of metres, if not kilometres, of area. The size of the lease was chosen as Southern Launch puts safety to people as its first priority. This was negotiated with the landowner who agreed with South Launch's assessment of ensuring safety to the public being the number one concern.

The License affords Southern Launch a Lease Option over the land and has been secured by a Caveat over the land specifically dealing number 13086855 listed on the Certificate of Title under the Schedule of Dealings.

The land is also subject to a Heritage Agreement pursuant to the South Australian Heritage Act, 1978 of Portion, registered as dealing number 6456268 listed on the Certificate of Title for the purposes of a Native Vegetation Heritage Agreement HA 148.



Under the above agreement the land (Being the land subject to the agreement as depicted on the 'Plan for Heritage Agreement') is dedicated to the conservation of native vegetation and native fauna.



DESCRIPTION OF THE LOCALITY: s 46(6)(d)(ii)

The locality around the proposed Whalers Way Orbital Launch Complex comprises substantially of land held for the purpose of conservation of native vegetation and native fauna.

The area has a very low density of human habitation with the closest habitable building located 2.5 kilometres from the site and the City of Port Lincoln some 25 kilometres to the north east of the location for the proposed launch complex.

General farming and pastoral activities are undertaken on land to the north of the site. The Lincoln National Park exists on the peninsula to the east and the Cathedral Rocks wind farm comprising of 33 Wind Turbines, is located on abutting land with frontage to the coast to the north west of the site.

The Thorny Passage Marine Park is located off the coast to the south of the subject land within the Southern Ocean.

The State Heritage listed Former Fishery Bay Whaling Station, and Thorny Passage Marine Park are located on land abutting the north-eastern boundary of the land which is the subject of the development proposal.



PRELIMINARY CONSULTATION

Both the District Council of the Lower Eyre Peninsula (DCLEP) and the District Council of Port Lincoln (DCPL) have been engaged, both of which have indicated their support for the development of the proposed Complex.

Southern Launch has engaged Regional Development Australia Whyalla Eyre Peninsula (RDAWEP) on numerous topics including engagement with the local fishing industry, local residents, industries and education sector interest. RDAWEP brokered introductions that led to the commercial agreement between Theakstone Property Pty Ltd and Southern Launch. RDAWEP have also approached surrounding inhabitants on a case-by-case basis to help the local community understand the proposed development.

Department of Primary Industry and Regions (South Australia) (PIRSA) have been briefed on the proposed Complex.

The government has also established the 'Southern Launch Taskforce' comprising members from:

- DefenceSA (chair);
- Department of Trade, Tourism and Investment;
- Office of the State Coordinator General;
- Department for Planning Transport and Infrastructure (DPTI);
- Environment Protection Authority (EPA);
- Country Fire Service (CFS);
- Department for Energy and Mining (DEM);
- South Australian Police (SAPOL);
- Department for Environment and Water (DEW);
- Department for Treasury and Finance (DTF); and
- Department for Primary Industries and Regions, South Australia (PIRSA).

A discussion has been had with the Deputy Chief Commissioner South Australian Police and Country Fire Services.



Southern Launch is yet to start a formal public engagement strategy on the proposed development of the Complex. A public awareness program was started on 5 December 2018 when the Premier formally announced the potential for development of Whalers Way site.

PRELIMINARY INVESTIGATIONS

The following preliminary investigations have been undertaken to inform the development proposal to date:

- Site Identification Assessment;
- Desktop Native Vegetation Assessment;
- Cultural Heritage review for sites of Aboriginal Heritage Significance;
- Uley lens aquifer boundary location;
- Fire Danger Zone classification identification;
- Assessment of AMSA Shipping lanes;
- Overall Space Launch Facility approval process as defined under the old Space Activities Act 1998 and the new Space Activities (Launches and Returns) Act 2018; and
- Consultation with the Australian Space Agency on site suitability and overall operation approval processes, including but not limited to:
 - Public Safety;
 - Site Security during Launch; and
 - Launch Trajectories.

DESCRIPTION OF THE EXPECTED ENVIRONMENTAL, SOCIAL OR ECONOMIC EFFECTS: s 46(6)(d)(iii)

The following sets out the range of issues which together result in the development being one of “major environmental, social or economic importance” (Section 46(1) of the Development Act). All these issues need to be considered, however the extent of the investigations required and their effects has yet to be determined.

Environmental

- Native vegetation clearance and management.
- Conservation and protection of native fauna habitat and control of pest species.



- Management Plan for the installation of a long-term programme of significant environmental benefit.
 - Wastewater management and disposal.
 - Stormwater management and reuse.
 - Sustainable provision of water supply.
 - Sustainable provision of power supply.
 - Protection of the environment from Hazardous Material spills.
 - Management of Acoustic Impact.
 - Management of Bushfire Risk.
 - Visual effect of the proposed development natural character of the locality.
 - Impact on the natural environment through potential impact through increased “human disturbance”.
 - Impact from spent (Discarded) Launch Vessels
- Social**
- The opportunities to enhance local communication infrastructure.
 - The effects on the existing Port Lincoln township.
 - Development of a space tourism industry.
 - The implications for service sectors including retail, hospitality and other service providers to support or be supported by the development.
 - Upgrade of existing road network including Whalers Way Road and Fisheries Bay Road.
 - Higher throughput through the Port Lincoln regional airport, Port Lincoln wharf and broader Eyre Peninsula road network.
 - Attraction and retention of higher education learning facilities to the region focused on developing and testing space related technologies.
 - Impact on Tourism and continued Public Access to Whalers Way Sanctuary



Economic

- The economic impacts during and post construction including employment and Gross State Product (GSP) impacts.
- The 'Multiplier Effect' or flow on economic impacts of investment associated with the project including impacts on employment and Gross State Product.
- Attraction and Enhancement of Business investment opportunities within the region operating as rocket launch customers on the Whalers Way Complex.
- Attraction and Enhancement of Business investment opportunities within the region associated with the supply and support to the rocket launch customers of the Whalers Way Complex.
- State-wide, Regional (Eyre Peninsula) and town (Port Lincoln) economic impacts associated with the project including employment, increased utilisation of existing infrastructure, future tourism, development of space related higher education learning facilities.
- Impact on Commercial Shipping Lanes

MANAGEMENT OF EXPECTED ENVIRONMENTAL, SOCIAL OR ECONOMIC EFFECTS: s 46(6)(d)(iv)

The management of effects has been considered to a partial extent given the extent of investigations carried out to date.

Environmental

- Launch facilities and associated infrastructure will be placed on areas on a best efforts basis excluded from the Heritage Agreement, do not have intact native stratum, or the impact of development is assessed to be low.
- Flora and fauna assessment reports will include (but not be limited to) the following as per regulatory requirements:
 - Bushland Vegetation Assessment for clearance applications;
 - Plant Community information;
 - Fauna habitat information – including known listed species;
 - Opportune Faunal Lists and mapping;
 - Plant species list;
 - Vegetation mapping;
 - History of land use – including existing Heritage Agreement;
 - Condition of Vegetation;
 - Assessment against Principles of Clearance of NV Act;
 - Assessment against EPBC Act 1999;



- Assessment against Native Vegetation Act 1991;
 - Assessment against S.A. state conservation rated species;
 - Include site photos that add value to the report;
 - SEB payments or offset calculations;
 - Conclusions on potential environmental impacts;
 - Summarised Landscape Management Plan; and
 - Mitigation recommendations.
- The Complex is to operate as a green propellant facility, greatly limiting the type and quantity of propellants allowed onsite during any one time.
 - The Complex will be designed to only support micro- and small-lift rocket vehicles not requiring the development of large infrastructure that would otherwise disfigure the surrounding environment.
 - Where necessary and possible geo-barriers will be employed to limit the potential damage an inadvertent spill or leak of liquids could impart.
 - Annual investigations into the effect rocket launch activities have on the local fauna and flora with subsequent recommendations on the best methods to protect the regional fauna and flora.
 - It is proposed that similar maritime environment analyses as per RocketLab's Launch Complex 1 on the Mahia Peninsula, New Zealand be carried out including five yearly investigations into the effect of disposing spent rocket stages into the water has on the local environment.
 - Bush fire risks will be mitigated through the installation of Southern Launch fire fighting equipment at every launch event. Initial firefighting capabilities during rocket launch attempts will be augmented by local Country Fire Service (CFS) crews. Sufficient water will be located onsite to successfully control and contain any unexpected fire.
 - At this point in time none of the customers from Whalers Way are proposing to recover the spent stages. The same methodology that New Zealand is employing with RocketLab will be used for the Whalers Way Launch Site.
 - An assessment of the proposal pursuant to the requirements of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* will be undertaken and appropriate assessment processes under that legislation undertaken.

Social

- A dedicated visitor viewing area is to be developed in conjunction with, or by the District Council of Lower Eyre Peninsula with input from Southern Launch.



- As appropriate, local population education programs describing upcoming Complex construction and subsequent rocket launch events.
- All launch events will be coordinated with the State and local branch of the South Australian Police to ensure safe public viewing and security. The national terrorist threat level will be assessed on a launch by launch basis by the Police and appropriate measures put in place as required to ensure safety to the local population, viewers and the Launch Complex.
- The Impact on Tourism and continued Public Access to Whalers Way Sanctuary needs to be carefully managed, noting that the Lease area is located on Freehold Land and there is no public Road access through Lot 101 nor any Rights of way there is currently restricted access to the coast. The commercial license and lease agreements Southern Launch have on the land with the owner, provide the need for the land and road to be closed when it is necessary for public safety, or when it is mandated by the Australian Space Agency under a safety protocol. Appropriate protocols will need to be established in consultation with existing Tourism operators to maintain limited access.

Economic

- Recommendation that all economic development activities related to Southern Launch customer activities be coordinated with the District Councils of Lower Eyre Peninsula and Port Lincoln.
- The Impact on Commercial Shipping Lanes will be calculated and assessed as part of the ASA's launch license and based on a maximum probable loss methodology underpinned by a statistical analysis of all potential rocket explosion events and a formal engineering management system. Southern Launch recommends the formal safety assessment encompassing shipping and air traffic, as well as the risk to high value assets and population densities be undertaken as part of a formal application for a launch permit through the Australian Space Agency. If the launch of the particular rocket is approved, outcomes from the assessment will include the development of NOTAMS, etc. to ensure safety to shipping, etc. with the goal of minimising any impact on commercial operations in the area.



STATEMENT OF CONSISTENCY WITH STRATEGIC DOCUMENTS: s 46(6)(d)(v)

SPACE Innovation and Growth Strategy (South Australia) Action Plan 2016-220

The 'Action Plan' seeks as a South Australian Government priority to "capture the opportunities of space to grow our economy and create high value jobs of the future.

The Action Plan has three interconnected pillars focussing on:

- growing South Australia's economy through space activity;
- invigorating South Australia's space innovation ecosystem; and
- engaging international cooperation with lead countries.

Action 1, to increase awareness, is essential in the promotion of the South Australian space economy and to increase awareness of the space sector as an innovative area to invest and collaborate.

The Action Plan recognises that the South Australian Space Industry Centre will lead the state's space industry development efforts, offering focused and responsive support to drive the growth of South Australia's space sector and deliver key projects and facilities.

The proposal exhibits a high level of consistency with this strategy, being a directly envisaged development.

South Australian Planning Strategy

The Eyre and Western Region Plan (April 2012) is the relevant volume of the South Australian Planning Strategy.

The preface by the then Minister for Planning the Hon John Rau MP states that:

"The Eyre and Western Region Plan is designed to ensure that the region remains a great place to live, work and visit for many years to come. The plan is one of seven regional volumes in the South Australian Planning Strategy. Based on a presumption of strong economic growth, the plans indicate where new housing, industry and commercial activity should be best located – and not located. The plan outlines the different roles and functions of towns and addresses important issues such as the way industrial, commercial and residential areas connect and impact on each other."

The strategy identifies that the region is serviced by "Extensive infrastructure includes four of the state's nine major export ports, three major regional airports (including the state's largest regional airport in terms of runway length at Whyalla) and connections to the national road and rail networks." which benefit the



proposed development providing the logistics of receiving rockets by sea prior to relatively short land transportation to the site.

The Key issues for the Eyre and Western region have been grouped into four themes:

- Environment and sustainability
 - Balancing native vegetation management, the protection of vulnerable ecosystems and the maintenance of aesthetically pleasing landscapes with economic development.
 - Supporting native habitat areas so they can adapt to and survive climate change.
 - Planning for sustainable coastal development while protecting coastal land and waters.
 - Locating development away from hazardous areas and ensuring that appropriate prevention measures are in place.
 - Supporting the region's water security, including developing strategies to harvest and recycle water supplies and developing alternative water sources.
 - Supporting development of renewable energy.
 - Adapting development and services to cater for the effects of changing climatic conditions..
- Economic development
 - Retaining and enhancing the region's unique natural assets and culture to support tourism.
 - Supporting aquaculture growth by allocating land for service providers and processing.
 - Protecting and encouraging diversification of activities on primary production land.
 - Supporting existing and new mining and energy developments.
 - Supporting and encouraging development of alternative energy resources.
 - Attracting and retaining a skilled workforce.
 - Supporting industries in adapting to the effects of climate change.
- Population, settlements and culture
 - Supporting development of a range of residential accommodation options to support the diversity of residential needs (for example affordable and aged housing).
 - Retaining and attracting young people and skilled personnel.
 - Identifying cultural values and encouraging a 'sense of place' in each community *f*
 - Providing adequate and accessible community services.
 - Building population, employment and services in key growth centres that can also serve rural and remote residents and businesses.
- Infrastructure and service provision
 - Maximising the use and adaptability of infrastructure through consolidation, clustering and economies of scale.
 - Protecting land corridors for expansion or augmentation of infrastructure.



- Providing adequate infrastructure (for example, transport facilities, communications, energy, water security) to support development of mining, agriculture aquaculture and tourism.
- Supporting the development of social and community infrastructure.
- Protecting services for airlines and the Royal Flying Doctor Service.

The proposal is considered to exhibit a strong degree of consistency with the South Australian Planning Strategy, notwithstanding that the nature of the use proposed is not specifically envisaged.

Development Plan

The subject land is located within the District Council of Lower Eyre Peninsula and accordingly the relevant Development Plan policies are contained with the Lower Eyre Peninsula Council Development Plan.

The current version of the Lower Eyre Peninsula Council Development Plan is dated and consolidated on 12 July 2018.

The subject land is contained with the Coastal Conservation Zone as illustrated on Zone Maps LEP/1 and LEP/18 respectively. It is not located within any specific Policy Area or Precinct of the Coastal Conservation Zone.

Aerospace facilities are not listed nor discussed within the Lower Eyre Peninsula Council Development Plan.

The primary objective of the Coastal Conservation Zone is "to enhance and conserve the natural features of the coast including visual amenity, landforms, fauna and flora." . The zone allows for low intensity recreation uses and to maintain farming area outside of areas of native vegetation, coastal dunes and wetlands of national importance.

The relevant principles of development control focus on the conservation and enhancement of the coastal environment and scenic beauty of the zone.

While the zone includes an extensive list of non-complying forms of development, an aerospace facility, rocket launch facility or orbital launch complex is not listed as non-complying within the zone. It would however be Category 3 for the purposes of Public Notification if assessed under Section 33 of the Development Act, 1993.



The following General Section provisions of the Development Plan are relevant under the consideration of the proposed development:

- Coastal Areas module including:
 - environment protection;
 - maintenance of public access;
 - hazard risk minimisation;
 - erosion buffers;
 - land division;
 - protection of economic resources, and
 - development in appropriate locations.
- Heritage Places module;
- Interface Between Land Uses module including:
 - noise generating activities;
 - air quality; and
 - rural interface.
- Natural Resources module including:
 - water sensitive design;
 - water catchment areas;
 - biodiversity and native vegetation; and
 - soil conservation.

The Development Plan does not envisage the proposal, and current policy for the affected land does not offer significant support for the proposed development.

OTHER LEGISLATION

The development incorporates components that may require authorisation pursuant to other state legislation including but not limited to:

- The Native Vegetation Act 1991;
- Heritage Places Act 1993;
- Coast Protection Act 1993;
- Natural Resources Management Act 2007;



- National Parks and Wildlife Act 1972;
- Marine Parks Act 2007;
- Environment Protection Act 1993;
- The Commonwealth Space Activities Act and Regulations 1998; and
- The Commonwealth Environment Protection Biodiversity and Conservation Act.

Once the proposal is proclaimed as a major project, more extensive liaison with the relevant agencies will be undertaken to determine all requirements.

CLOSURE

Section 46(1) of the Development Act specifically provides for the consideration of proposals of a special or more complex nature than is anticipated or contemplated in the Development Plan. The application of several elements of environmental management will be necessary given the nature and variety of development components. The proposal also involves the development of facilities reinforcing and acting upon the existing Government policy to create a space-enabled economy within South Australia and will further reinforce regional development.

For these reasons, Southern launch considers the proposal warrants major project status to ensure a full and proper assessment.

We would be pleased to provide any further information which may be required for your consideration.

Yours sincerely

Greg Vincent
MasterPlan SA Pty Ltd

enc: Southern Launch Whalers Way Operations Overview.
Certificate of Title Register Search.

cc: Department of Planning, Transport and Infrastructure, Att: Mr Simon Neldner (by email).
State Coordinator-General's Office, Att: Mr Mark Williams (by email).
Southern Launch, Att: Mr Lloyd Damp (by email).