Jacqueline Arnold
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NT 0870

15 July, 2022
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Pastoral Diversification Permit – Lorella Springs Station

I am writing to request that you reject the application by Maximus No. 82 Pty. Limited & Landmark Developments Pty Ltd for vastly expanded tourism activities on the site, including accommodation for up to 318 people per night and tens of thousands of visitors per year.

I am opposed to the approval of this application because:

1. The assessment process is procedurally problematic:
   - The proposal is highly inappropriate and vastly different from the type and scales of use envisaged under a pastoral lease diversification permit.
   - With no intended disrespect to members, the membership of the Pastoral Lands Board does not seem to have been selected for capacity to assess this type of application or give the public confidence that the seriousness of risks are properly appreciated. This lack of confidence is exacerbated by the fact that the PLB does not publish detailed minutes of its meetings.
   - The pastoral diversification permit application assessment process is inadequate to engage the public in a discourse about whether this type of activity is fundamentally suitable on leased public land.
   - The pre-referral screening checklist against the "NT EPA Factors" diminishes the risks associated with the application, and only considers the direct impacts of expanded tourism within the development footprint - it does not give adequate consideration to impacts on the greater station and neighbouring Limmen National Park.

2. The proposal is unacceptable in concept, design and proposed management
   - The proposal is too close to Lorella Hot springs and swimming needs to be regulated.
   - It will bring thousands of people to Lorella Springs annually. This type of people pressure inevitably will lead to damage to the springs and Rosie River, risks contamination of the springs and waterways from activities associated with effluent treatment, damage to riparian areas including erosion and human competition to significant native fauna. The AAPA Abstract of records appears to show Lorella Springs are a sacred site (C1994/107).
   - Swimming at Lorella Springs is encouraged. Increased numbers of people will damage the hot springs fragile banks, any works to stabilise bank would clearly involve interference to waterways. The applicant does not recognise this risk and explicitly states the proposal does not require sediment control.
   - It is unclear that drinking water will be safe to drink or that the amount of water to be taken can be taken without damaging the springs or waterway
   - A scan of the internet shows that the location is viewed as an "off-limits" paradise for 4WD tourism. Expanded 4WD use will cause erosion, spread of weeds and other biosecurity risks and threaten sacred sites. Vehicular access necessitate interference to waterways either

through erosion and sedimentation or track maintenance and construction. Interference to waterways is prohibited without approval under S40 of the Water Act 1992

- Visitors are encouraged to not just visit the Springs but 48 destinations including waterfalls, rock and plunge pools, gorges, lakes, billabongs, creek and swamps within the station. However the application does not address how people pressures will be managed and these 48 destinations protected.
- One can only wonder how many of the above 48 destinations are sacred sites or highly ecologically significant. There is a reason why National Parks are established for heavily visited areas. This is to ensure effective, culturally appropriate management takes place, with concern for biodiversity, equity and future generations. There is nothing in the application to give any confidence that the serious responsibility of managing these sites with these broader imperatives is appreciated or that management has capacity to do this.
- The application states (p81-83) the Lorella Springs station contains 16 listed threatened species, 15 listed migratory species and 20 listed marine species. It is simply unacceptable for these to be put at risk by a half-baked approval with no plan of management for the whole station. Lorella Springs is based upon a vastly different standard of management to that employed within the Limmen National park, But Limmen National Park could be compromised by unregulated management on Lorella Springs.

Thank you for considering my submission.

Sincerely,

Jacqueline Arnold