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6 June, 2025

Pastoral Land Board
Via 'Development Applications Online'

To the Pastoral Land Board,

RE: Pastoral Land Clearing Application – Amaroo Station NT Portion 5162, 5163, 4868, 749, 7492 and 1290, 662.49 Hectares (ha), Plenty Pastoral District

We write top object to the application by Department of Logistics and Infrastructure to clear **662.49 Hectares (ha)** of native vegetation for gravel extraction for roadworks and road detours.

Our objection is based upon the following considerations:

1. Gravel extraction for roadworks is not a pastoral use that may be applied for in Section 91F Pastoral Land Act 1992, under which this application is made. This is clarified in 91F(3) which states *"To avoid doubt, a clearing permit only permits a pastoral lessee to clear land subject to the lessee's pastoral lease and does not permit the lessee to use the land for a non-pastoral purpose"*. This proposal needs to be made via through mineral titles and non-pastoral use legislation, with indigenous Land Use Agreements in place with Native Title holders.

2. In addition to the above fundamental shortcoming this is a very sketchy proposal. It states 'exact locations of the detour and borrow pits have not yet been determined and are subject to on ground verification by the successful contractor. Borrow pits will be located approximately every 500m of the road, offset 150m north of the road centreline, and will be 300m long by 100m wide.' In other words the applicant intends to locate gravel pits and detours where it is most convenient, not where dictated by the environmental and site conditions. It also seeks to make these decisions after approval is obtained, bypassing the opportunity for public review and enforcement of an agreed plan (if approved).

3. The application contains and mitigations are based generic environmental management specifications rather a specific, detailed proposal based upon actual site conditions. This approach is unacceptable as it will not minimise or avoid adverse impacts on the environment and cultural values etc. It effectively says 'trust us' instead of providing a detailed environmental management plan for review. It also bypasses the opportunity for public scrutiny and enforcement.

4. The application does not demonstrate the need for the proposed detours. These will substantially increase the amount of clearing needed. Other traffic management approaches should be required that keep the impacts within the road construction footprint

5. Notwithstanding the previous comment, buffers to the Sandover River are too small. It appears the buffer from the proposed detour road is as small as 80m, despite guidance that a minimum buffer of 250 m is needed. We are also particularly concerned about roadworks and detours in floodplains and damplands. For these areas in particular different traffic management approaches are needed.

6. Strategies to protect EPBC Listed species like the Central Australian Rock Wallaby are inadequate. For this species and any others, it is not good enough to effectively hope they move. Management strategies based on site surveys must be designed to ensure safe access to food, water sources, movement and dormitory requirements, both during construction and in the long-term.

7. Strategies to protect Aboriginal artefacts are generic and not based upon new site surveys or consultation with the custodians. For example a 'Stone artifact scatter is identified 140m south of Gravel pit 1, adjacent to the detour/borrow pit buffer'. The management proposed is a generic 50m buffer. Protection of this and other sites must be based upon consultation and site considerations to ensure the proposal does not adversely impact this site, not generic buffers.

8. Weeds, including buffel grass are not effectively managed. The applicant is unable to state where buffel grass occurs. Good weed hygiene and management strategies are needed to ensure buffel grass and other declared weeds are not spread between infested and uninfested areas. Completion of works should include removal of buffel and other weeds.

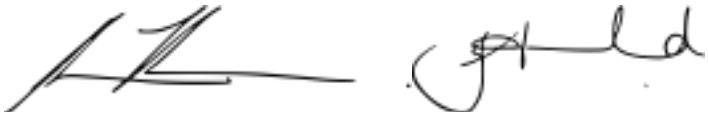
9. Minimising size of gravel pits – the application does not demonstrate that every effort has been made to minimise the amount of land needed for gravel pits and detours.

10. Rehabilitation of gravel pits – these should be rehabilitated with bonds in place to ensure this is done to an acceptable standard.

We request the opportunity to review this proposal when made under the correct legislation.

Thank you for your consideration.

Kind Regards,



Adrian Tomlinson and Jacqueline Arnold