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24 June 2025

Pastoral Land Board
Via 'Development Applications Online'

To the Pastoral Land Board,

RE: Pastoral Land Clearing Application – Hamilton Downs Station, PPL 1145, NTP 4423, Northern Alice Springs Pastoral District

We write to object to the application by Department of Logistics and Infrastructure to clear **2,528.47 Hectares (ha)** of native vegetation for gravel extraction and public road upgrade works.

Our objection is based upon the following shortcomings.

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 proposal is fatally lacking detail and based almost entirely on inadequate desktop information. It seeks to defer crucial aspects of proposal design until after an approval is obtained, bypassing the opportunity for public review, and making the proposal so vague that effective, enforceable conditions could not be established (if approved). This is a repeated theme in the concerns we raise throughout this submission.

3. The proposed clearing areas are too large. The application acknowledges the clearing areas will ultimately be smaller, however the work required to hone in on the actual locations needs happen prior to assessment and has not. The application must be for no more clearing than is actually required and only in the most suitable locations. Deferring this aspect of project design means an approval would allow far more clearing than is needed. Again by not providing detailed upfront commitments regarding the exact size and locations of the clearing, effective, enforceable conditions cannot be made.

4. Consideration of threatened species is inadequate and deferred. As it stands there are records of EPBC listed specie the grey falcon adjacent to proposed clearing in Pit 2 Ch26R. It is unacceptable to leave field assessments and critical design decisions to the applicant to resolve after the assessment phase.

It also appears observations of listed species are concentrated in areas where past field studies have occurred rather than reflecting the extent of these species, making any discussion on the impacts and mitigations on listed species moot.

The application has not demonstrated that proposed gravel pits sites are situated so as to avoid, with meaningful buffers, all EPBC listed species and habitat areas, and incorporates all other necessary mitigations. This requires upfront field-work. If an approval were eventually granted these mitigations need to be included as approval conditions.

5. The application relies on mitigating risks via generic environmental management specifications that will go in contract documents rather a specific, detailed upfront proposal based upon actual site conditions. This approach is unacceptable as it will not minimise or avoid adverse impacts on the environment, cultural values etc. It effectively says 'trust us' instead of providing a detailed environmental management plan for review. Once again it also bypasses the opportunity for public scrutiny and effective enforceable conditions.

6. Strategies to protect Aboriginal artefacts are generic and not based upon new site surveys or consultation with the custodians. Significant sacred sites and protected areas occur in the area. The management proposed is a generic 50m buffer. Protection must be based upon consultation and site considerations.

7. Weeds management is insufficient and based on inadequate and misleading data records. The weeds map on page 40 of the application highlights just how bad NT databases can be. It reports just a few isolated buffel and love grass records. However it is well known that buffel and African lovegrass are very widespread in this area, especially along the road corridor. The applicant should have done its own fieldwork prior to lodging this application.

   The unrepresentive and deficient weeds record calls into question whether other NT databases like flora and fauna observations are similarly deficient. It highlights that field surveys are essential to allow meaningful proposal design and assessment.

   Effectively avoiding weed spread and ameliorating weed infestations (in particular invasive grasses) is very important as there are culturally and environmentally important areas, which are in part uninfested and vulnerable to buffel invasion, such as on the Yurretye Aboriginal Land Trust in close proximity to the proposed clearing and roadworks. We cannot speak to the extent of the cultural values on the Yurretye Aboriginal Land Trust but we have joined family outings and witnessed some of the range of bush foods available in healthy country close to the Tanami Road and the immense importance placed on accessing these for food and also as a family and teaching activity.

   The close juxtaposition of infested and uninfested areas demands strong measures in design, implementation and completion to ensure buffel grass, African lovegrass and other declared weeds are not spread between infested and uninfested areas and that completed final works are buffel free.

   As it stands weed hygiene protocols are inadequate. For example the application proposes vehicles will not move through buffel when it is seeding, however seeds could be picked at any stage. If a resubmitted application is approved South Australia buffel guidance such as the following should be applied.
   https://pir.sa.gov.au/__data/assets/pdf_file/0003/275907/PIRSA_factsheet_Buffel_Grass_Hygiene_FA2_CJ.pdf

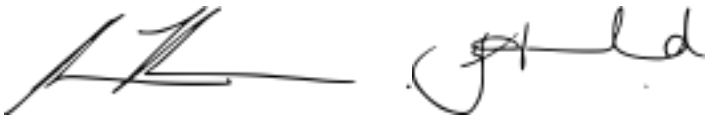
Completion of works should also include removal of buffel and other weeds.

8. Residents of Yurretye Aboriginal Land Trust should have but appear not to have been properly consulted in proposal design. They must have the opportunity to make a submission on this or any resubmitted application. I spoke to an elder who is connected to these homelands. She advised she was unaware of the proposal and the she wanted it to be 'discussed slowly' with her and some particular people. It is not acceptable for this proposal to have progressed so far without this having occurred.

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

Thank you for your consideration.

Kind Regards,



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