

To the Northern Territory Environmental Protection Agency (NT EPA),

Thank you for the opportunity to submit comment on the Terms of Reference (ToR) for the Environmental Impact Statement (EIS) assessing the environmental impacts of the proposed Adelaide River Off-Stream Water Storage (AROWS) project.

I am a property owner and permanent resident of Lake Bennett for almost 10 years and I have some concerns about the proposed AROWS project.

### **Environmental and Social Impacts**

I note that the ToR does not include social impacts however I consider that there are at least two significant social impacts Lake Bennett and surrounding communities identified issues are:

- Access to the Adelaide River Foreshore area currently used for recreational driving and fishing in the rock bar and S bend area which will now form part of utility corridor.
- Significant increase in traffic in the area surrounding Lake Bennett (Chinner Road and Heathers Lagoon Road).

Also of note in regard to Chinner Road, in previous consultations it has been mentioned that the current width of Heathers Lagoon Road as an access road for machinery during the construction phase is not sufficient. If this is the case, then there will be a number of areas along Chinner Road where significant clearing will also need to be done, particularly the section circled in the map below which is where Chinner Road crosses over the main feeder creek for Lake Bennett in the wet season.



### **Off-Stream Storage**

In the ToR background information it states, that “in contrast to in-stream dams this is an innovative off-stream storage initiative, ‘as developed in other countries’”. Are there examples of how this type of infrastructure is working in other countries? I could only find one example in Australia which is the Bromelton Off-Stream Dam in South East Queensland which was completed in 2008 however, was decommissioned due to issues with seepage. There is also an off-stream water storage currently being constructed in NSW [Eurobodalla Southern Storage](#)

**Dam - Haslin Constructions**, however as this is still being constructed there is no evidence as to its sustainability or otherwise.

Will there be an assessment of existing similar infrastructure included in the EIS? It would be good to have some examples of where this type of infrastructure is established and include evidence of the sustainability of these water storage systems.

### **Alternative solutions**

It is my understanding that previous plans including the 2013 Darwin Region Water Supply Strategy identified the Upper Adelaide River Dam as potential option, and that this was the preferred option some years ago. It would be good to have a better understanding of why this option is not considered viable.

### **Protected species and locations**

The Terms of Reference are comprehensive and I look forward to reading the EIS, in addition to the impacted vulnerable species in the area, for example Black-footed Tree-rats, of particular concern is the impact that this infrastructure will have on both the Adelaide River Foreshore Protected areas and the Bamboo Springs area which is a beautiful and unique permanent spring that is sustaining a variety of flora and fauna.

### **Pumping from Adelaide River**

The quality of water pumped from the Adelaide River whilst it is in flood would be questionable, noting that some material refers to not extracting water during the 'first flush', the impact of removing not only water but the additional material that would be pumped out when the river is in flood cannot be underestimated, I note this is included in the EIS.

In the 2025 Project Update page 12, it states that the Benefits of off-stream reservoirs is that they are 'Climate adaptable- reduce or stop extraction in dry years, respond to weather events' if one of the purposes of the AROWS is to increase the water storage in case of low rainfall in consecutive wet seasons affecting the storage levels in Darwin River Dam and Manton Dam then it would not be reasonable to suggest that this resource could also not be used at this time.

### **Land Clearing**

How much land in the 'Basin' area will be cleared? The Terms of Reference states 5,610.50 ha of land disturbance. How much additional land will be cleared for the supporting infrastructure (including road widening)?.

### **Local Aboriginal people and Native Title**

It is noted in the Referral Form that the project does not yet have the legal (land) access required for the implementation of all aspects of the proposal

*'DLI is in negotiations with relevant landowners in relation to the acquisition of properties required. Regulatory approvals for the project including a Sacred Sites clearance certificate, resolution of native title, environmental approvals and a water extraction licence.'*

It is concerning that the project has progressed this far and that the government has expended a significant amount of budget where the project may not be viable at all if there are sacred sites or if local aboriginal people do not agree to the project. I have spoken to a number of local

people and there is a very low level of awareness of the project and the implications, which may include impeding access to some parts of the river for residents living in the nearby Acacia Larrakia community.

I also note that the Referral Form states that the “identification of Aboriginal stakeholders to date has been limited to advice from the Northern Land Council (NLC) and that a need for further engagement with other community leaders and the wider community has been identified.

Consultation with traditional owners has rarely been mentioned in the publicly available documentation. I think it is important for people impacted by this to understand what steps have been taken to determine sacred sites and what consultation has occurred to date with the Kunaraken people and the people residing at Acacia Larrakia community who will be most impacted by this infrastructure?

I appreciate the time taken to consider the issues I have raised.

Thank you,

Tania Roberts.