



**Aboriginal Areas
Protection Authority**
protecting sacred sites across the territory

Ref: 2026/3-3

Department of Lands, Planning and Environment.

Via email: WaterResources.DLPE@nt.gov.au

RE: DRAFT ALICE SPRINGS WATER ALLOCATION PLAN 2026-2036

Thank you for the opportunity to make a submission on the Draft Alice Springs Water Allocation Plan 2026–2036, and please accept our apologies for the late submission of our comments.

The Authority's submission is provided at Attachment A.

Should you wish to discuss the Authority's Submission, please contact Secretariat.AAPA@aapant.org.au.

Yours sincerely,

Robert Pocock
Chief Executive Officer
07 April 2026

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ABORIGINAL AREAS PROTECTION AUTHORITY SUBMISSION

Draft Alice Springs Water Allocation Plan 2026-2036

The Aboriginal Areas Protection Authority (the Authority) welcomes the opportunity to comment on the draft Alice Springs Water Allocation Plan.

The Authority's interest in the Plan is confined to its statutory role under the *Northern Territory Aboriginal Sacred Sites Act 1989*, namely the protection of Aboriginal sacred sites. The Authority does not express a view on groundwater drawdown or water allocation settings as matters of policy in their own right, except to the extent that the technical and scientific framework relied upon in the Plan identifies particular measures as necessary to protect water-dependent sacred sites and their features.

The draft Plan identifies a limitation on groundwater drawdown in the Town Basin aquifer, specifically that groundwater levels are not to fall below eight metres below ground level, described as the limit of acceptable change for groundwater-dependent ecosystems in the Todd River corridor. The Authority understands that the Plan seeks to protect water-dependent ecosystems through this limitation, and notes that these ecosystems include water-dependent sacred sites and their features, including river red gums and other vegetation.

The draft Plan frames groundwater drawdown limits as measures to protect water-dependent ecosystems. The Authority notes that water-dependent ecosystems in the Alice Springs area include Aboriginal sacred sites and their features, which may include flora such as river red gums. There is a high density of sacred sites in Alice Springs that are intrinsically connected to the presence, availability and stability of water.

The licensing policy within the draft Plan states that:

'Water taken or proposed to be taken under a groundwater extraction licence in the Town Basin will not result in a change to the groundwater level exceeding eight metres below ground level in the Todd River corridor, as the limit of acceptable change for groundwater dependent ecosystems in the Town Basin.'

The overview of water management in the draft Plan further indicates that river red gums in the Todd River corridor are protected through limits on extraction when groundwater levels exceed eight metres below ground level.

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There are also numerous water-dependent sacred sites and site features within the Outer Farm management zone, including river red gums and other vegetation. The cultural values present in this area are of equal significance to those within the Town Basin.

If the technical and scientific basis for the drawdown limitation in the Town Basin is that such limits are necessary to protect water-dependent ecosystems, the Authority considers it important that the Plan clearly address how equivalent protection of water-dependent ecosystems is provided within the Outer Farm management zone, particularly where those ecosystems support or include sacred sites and their features.

The Authority therefore recommends that the Plan clearly articulate how groundwater extraction across all alluvial aquifers will be managed in a manner that ensures the ongoing protection of cultural values associated with water-dependent ecosystems, including through the application of consistent or comparable drawdown limits where these are identified as necessary to avoid harm.

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