



**28 August 2020**

NT Planning Commission  
GPO Box 1680,  
DARWIN NT 0801  
Via email [ntpc@nt.gov.au](mailto:ntpc@nt.gov.au)

To whom it may concern,

**Submission - Planning for Gunn Point Peninsula**

The Keep Top End Coasts Healthy (KTECH) is an alliance of environment groups including the Australian Marine Conservation Society, the Pew Charitable Trusts and the Environment Centre of the Northern Territory. We welcome the opportunity to comment on the Planning for Gunn Peninsula and Glyde Point.

Glyde Point is an area of significant cultural importance with high conservation, tourism, fishing and cultural values, including mangroves, coral reefs, rainforest and woodlands. The area is a feeding ground for endangered turtle and dugong species; it is a highly valued recreational fishing area for the Top End community and sustains other fishing areas nearby; and it contains significant cultural sites and areas of ongoing use for the Traditional Owners. Clearing thousands of hectares of land, dredging a port, and installing heavy industry here would destroy what the Top End community holds dear about this place.

The NT Government recognised this in October 2007 when, after a sustained period of broad community opposition to a similar massive land clearing and port dredging proposal, it designated the area Public Open Space and protected it from more inappropriate development.

Reversing this protection now makes no sense for the environment or for our community.

Our submission below focuses on the harmful impacts that this massive industrial development would have for our coasts and the people who love them. This proposal to develop a massive port and industrial estate and a town of 36000 at Gunn Peninsula and Glyde Points will undo over a decade of protection of this area. Putting heavy industry on the coast at Glyde Point increases the risk of major disasters including oil spills, chemical pollution and shipping accidents. The consequences of such a disaster for this area would be disastrous.

The proposal does not make environmental, social or economic sense and should be rejected.

I attach a copy of the report [\*Rainforest to Reef just 40km from Darwin: an assessment of the conservation values of the Gunn Peninsula/Vernon Islands area and the impacts of the proposed Glyde\*](#)

[Point heavy industry and residential estate](#). This report provides further information on the values of and threats to Gunn Peninsula and Glyde Point which we request you take into account when considering the future of this precious area.

Yours Sincerely,

Adele Pedder  
Keep Top End Coasts Healthy

### **Protect ecological values**

The Glyde Point coastal area is a gem in the Top End coastline.

The area is largely ecologically intact, with woodlands, sandy beaches, productive mangrove systems, rare rainforest communities, islands and coral reefs.

The Glyde Point coastal area contains:

- Over 50 species of flora and fauna that have been recognised in international agreements as warranting active protection;
- NT and nationally listed threatened species and migratory species;
- Important populations of endangered dugong and turtles, and their feeding grounds;
- Rare vegetation types like vine rainforest, and threatened rainforest patches and Callitric intratropica communities;
- Mangrove communities, seagrass patches and reef systems providing habitat for a rich and diverse marine fauna, with mangrove forests of similar diversity to Darwin Harbour;
- Significant coral structures and communities known as the 'blue holes'; and
- Natural features and landscapes, including the Vernon Islands, of outstanding scientific, recreational and conservation value.

The Northern Territory Government's proposed Glyde Point heavy industry and residential development on the Gunn Peninsula would have major and irreversible impacts on the ecosystems, environment and social and cultural values and uses of the region, including the marine and coastal environments of the semi-enclosed Van Diemen Gulf.

Glyde Point is located at one of only two narrow entrances to Van Diemen Gulf. The Gulf is a semi-enclosed marine environment bordered by:

- a. Kakadu World Heritage National Park
- b. Western Arnhem Land coast
- c. Coburg/Garig Gunak Barlu National Park and Marine Park
- d. the Tiwi Islands
- e. Djukbinj and Mary River National Parks and coastal conservation reserves

These five places have been recognized in the NTG's Parks and Conservation Masterplan (2005) as 'sites of international conservation significance'. Any risk of significant or ongoing airborne or waterborne pollution or contamination of this environment would cause a national and international outcry.

Major industrial development would destroy potentially thousands of hectares of relatively pristine woodland, rainforest, and marine and mangrove habitat. In addition the development would entail large-scale dredging and ocean-infilling to create a new port and a shipping access channel; a residential development for 36,000 people, including sewage outfall into Shoal Bay; substantial groundwater and surface water extraction; and marine and air pollution risks.

In addition to the impacts of large scale vegetation clearing, dredging and ocean infilling, the project would potentially expose underlying acid sulphate soils and change the hydrology of the surrounding area. The tidal flows and natural hydrology of Leaders Creek is likely to be altered substantially.

A number of important remnant rainforests on Gunn Peninsula, including Ginger Palmer's Jungle, are at risk of destruction or permanent degradation.

Heavy industry, such as potential smelters and chemical plants at Glyde Point as has been proposed previously, would use large quantities of fresh water and energy, and use or emit hazardous chemicals and pollutants including ammonium, fluorine, chromium, lead, arsenic, dioxins, sulphur dioxide and nitrous oxide. These industrial processes and pollutants would entail significant impacts on, and risks to, the marine and terrestrial environments and surrounding communities.

A dredged channel would be necessary to access the low lying coastal site at Glyde Point. This would destroy the benthic habitat of the proposed channel and disposal sites, and create a shipping channel in an area of large tidal ranges, strong currents and coral reefs.

A new port poses significant risks to the marine environment from shipping accidents, oil spills and ballast water discharge, containing toxic materials or pests and diseases.

These risks are magnified by the location of the development. It is a narrow entrance, partially blocked by the Vernon Islands and associated reefs, which is renowned for its dangerous currents and tidal flows - not to mention cyclonic activity in a changing climate.

The proposed Murrumujuk township, expected to house 36,000 people, is planned for a wide sandy beach facing Shoal Bay. The dunes behind the beach are of regional conservation significance; this development would involve a major sewage outfall into Shoal Bay; and no viable water source for a permanent city of that size has yet been identified.

#### *Ecological values in more detail*

In the north western corner of Glyde Point is an environmentally sensitive area containing Eucalyptus and Corymbia woodlands, Melaleuca communities, hypersaline flats, mangrove communities and rainforest/monsoon vine thickets. The monsoon vine thicket contains *Freycinetia excelsa* which is listed as vulnerable under the Territory Parks and Wildlife Conservation (TPWC) Act. It would require a buffer and exclusion from development to minimize the effects of fragmentation and preserve the *Freycinetia excelsa*.

The area is home to endangered plant and animal species, including many that warrant federal and Territory protection:

- EPBC and TPWC listed endangered flora in the area include *Ptychosperma bleeseri*.
- Flora species listed as vulnerable under the TPWC Act known to occur in the area includes *Cycas armstrongii*, *Utricularia dunstaniae*, *Malaxis marsupichila*.
- Flora listed as near threatened under the TPWC Act known to occur in the area include *Operculina turpethum*, *Pittosporum moluccanum* and *Utricularia hamiltonii*.
- The following flora which is listed as near threatened under the TPWC Act were identified through a database search as possibly occurring in the vicinity: *Acacia oligoneura*, *Chiloschista phyllorhiza*, *holtezi* and *triflora*, *Nymphoides subacuta*, *Citrus gracilis*.
- Fauna listed as endangered under EPBC and TPWC which were identified through database searches includes the Northern Quoll.
- Vulnerable fauna identified through database searches as possibly occurring in the vicinity includes:
  - Mammals - Water Mouse (*Xeromys myoides*) (EPBC).
  - Birds - Red Goshawk (*Erythroriorchis radiatus*) (EPBC / TPWC), Partridge Pigeon (*Geophaps smithii*) (EPBC).
  - Amphibians - Howard Springs Toadlet (*Uperoleia daviesae*) (TPWC).
- Migratory species identified from a EPBC protected matters search in the vicinity included:
  - Sharks - Northern River Shark (*Glyphis sp. C.*), and Freshwater Sawfish.
  - Mammals - Humpback Whale.
  - Reptiles - Green Turtle, Hawksbill Turtle and Flatback Turtle, Saltwater Crocodile.
  - Birds - White-bellied Sea-Eagle, Rainbow Bee-eater, Common Sandpiper, Ruddy Turnstone, Sanderling, Great Knot, Greater Sand Plover, Lesser Sand Plover, Oriental Sand Plover, Oriental Pranticole, Bar-tailed Godwit, Little Curlew, Grey Plover, White-browed Robin (*Poecilodryas supercilioiosa cerviniventris*).
  - Mammals - Irrawaddy Dolphin (*Orcaella brevirostris*), Indo-Pacific Humpback Dolphin, Spotted Bottlenose Dolphin, Dugong.
- Arafura Fantail (*Rhipadura dryas*) is listed as a migratory species under the TPWC Act and has been recorded in the Glyde Point area.
- The Howard Springs Toadlet was recorded in the sand plains to the south of Glyde Point and within the proposed infrastructure corridor. The toadlet is listed as vulnerable under the TPWC Act. The sand plains area would require appropriate water management in order to protect the Howard Springs Toadlet.
- The saltwater crocodile may be impacted through potential loss of habitat.

#### *Previous protection and proposals*

In 1990 the NT Department of Lands and Housing (DLH) proposed that the entire coastal region of Gunn Peninsula, from Adelaide River mouth around to Howard River mouth – and including Glyde Point, become a ‘Coastal Park’ in recognition of its outstanding conservation values.

The NT Government (NTG) Draft Parks and Conservation Masterplan (NRETA 2005) identified the coastal environments immediately adjacent to Gunn Peninsula to be of international conservation significance, and the coastal environment from the Adelaide River mouth to Shoal Bay, including Glyde Point, to be of national conservation significance.

In October 2007, the NT Government protected Glyde Point by zoning it Public Open Space after a sustained community campaign against massive industrial development at the site.

The NT Government has also previously proposed the creation of a Beagle Gulf Marine Park.

Reversing decades of listening to the communities requests to protect this special area now, is a mistake.

## **Community values**

### *Recreational fishing*

The Glyde Point coastal area is a beloved fishing area for people across the Top End, and sustains many other key fishing areas in this part of the coast. Development here could impact on important estuary and coastal areas in the vicinity of Glyde Point, Leaders Creek and the Adelaide River and, importantly, the Vernon Islands.

When a similar proposal was released in 2006, AFANT fiercely opposed it due to the risk that recreational fishing areas would be damaged beyond repair and the community would be locked out of many of the most important fishing spots near Darwin.

### *Aboriginal cultural significance and ongoing use*

Over 40 sites of cultural and archaeological importance exist in the area, including the visually striking shell mounds of Hope Inlet. 18 registered indigenous sacred sites and 9 recorded sites under the Northern Territory Aboriginal Sacred Sites Act occur in the Glyde Point area. The area would require further investigation for Aboriginal sites of significance before any development could occur. The cultural sites through the dunes threatened by the Murrimujuk development are significant and registered with the Aboriginal Areas Protection Authority.

Native Title claims have been lodged over the area. The ongoing use of the area by the Larrakia, Tiwi and Wulna people for hunting, teaching and ceremonial purposes would be compromised by the placement of fossil fuel and chemical-based industries that involve large scale clearing, highly toxic materials and processes, and emissions over surrounding areas.

### *Rural amenity*

This proposal would direct traffic for a major industrial site, as well as a town the size of Palmerston, through Howard Springs and the rural area. It would also lead to development inconsistent with the rural area along the whole corridor, not to mention 24 hour traffic noise for residents.

## **Economic concerns**

No rationale has been presented for replicating at Glyde Point – a near-pristine coastal and marine environment – all the tens of millions of dollars worth of infrastructure that already exist in the Darwin area – ports, shipping channels, pipelines, railway lines, powerlines, road networks, and people.

During an economic downturn, the NT needs public investment in projects that will be viable for the long term and that will help our existing communities. Pouring public millions into a duplicate port, without nearby communities or a clear economic rationale, is not a wise use of taxpayers money. Clearing 3000 hectares of land and building a township larger than the current population of Palmerston

- more than an hour from the centre of Darwin - makes no sense at a time when the residents of the Darwin / Palmerston area need jobs and spending closer to home.

The NT Government proposal states that there are no current plans for defence infrastructure at Glyde Point. A duplicate port is unlikely to be viable because of the proximity of port facilities at East Arm and Middle Arm, which are closer to existing communities, infrastructure and personnel. Given this, a port at Glyde Point would rely on an anchor employer, like Defence, to be viable. If this is part of the plan, the NT Government should be transparent with the community. Noting that the area is intended for 'Strategic Industry' is far from transparent.

### **Recommendations**

Keep Top End Coasts Healthy cannot support the destructive proposal to develop a massive port, industrial site, and a city the size of Palmerston, in a precious coastal area with every high natural, cultural, fishing, tourism and lifestyle values.

We support the designation of the Glyde Point region as an area for marine and coastal conservation, recreation and sustainable tourism. We call on the NT Government to prevent the industrialization of this special area, and instead reinvest its efforts into investigating the potential value of the site as a protected area, supporting well-managed tourism, cultural tourism and recreational industries.

Any expanded port activities should instead focus on the already disturbed sites at East Arm Wharf and Middle Arm, where infrastructure is already in place.

### **We recommend:**

1. The Northern Territory government (NTG) abandon plans for the Glyde Point industrial estate and associated massive residential development for 36,000 people.

2. That the Northern Territory Government:

- further examine the relative merits and benefits of a range of possible reservation, management and sustainable economic activity options for the area, such as Indigenous Protected Area/Marine Park status to support an expanded eco, fishing and cultural tourism industry in the area, and 'ecosystem services' benefits such as fish habitat, with the consent of Traditional Owners;
- examine alternative sites for appropriate industrial (and residential) development away from sensitive and pristine coastal environments and based on appropriate, best practice, and transparent site selection criteria;
- Invest in economic development in our existing communities and industrial areas, instead of pouring millions into a new, white elephant and destructive development.

3. That the NTG address as a matter of urgency the conservation and Indigenous concerns in the area, including protection of threatened areas of high conservation value such as Callitris and rainforest communities; resolution of land claims; and support for the traditional custodians to protect and manage sites of cultural significance.

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