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Director Lands Planning
Department of Infrastructure Planning and Logistics
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Via email: planning.ntg@nt.gov.au

Dear NT Planning Commission

Submission on Proposal to amend the NT Planning Scheme 2020 to update the Litchfield Subregional Land Use Plan – Gunn Point Peninsula

This is a joint submission from the Environment Centre NT (ECNT) and Keep Top End Coasts Healthy (KTECH). We welcome the opportunity to comment on the proposed update to the Litchfield Subregional Land Use Plan (LSLUP) in relation to the Gunn Point Peninsula.

ECNT is the peak community sector environment organisation in the Northern Territory, Australia raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision making processes and action.

KTECH is an alliance of environment groups including the Australian Marine Conservation Society, the Pew Charitable Trusts and ECNT.

General Comment

We reviewed the proposed updates to the LSLUP and related reports. As we have said in numerous land use submissions and development proposals for over thirty years, we do not support the development of industry on the Gunn Point and Glyde Point Peninsula. It is disappointing and concerning that the Northern Territory Government (NTG) continues to create policies to facilitate the development of industry in this special place.

Glyde Point's ecosystems, including mangroves, coral reefs, rainforest and woodlands, have high conservation, tourism, fishing and cultural values. 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 NTG 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 Glyde Point as Public Open Space and protected it from more inappropriate development.

The LSLUP policy documents continue to ignore the existing zoning and intended usages of the peninsula as Conservation (CN) and Public Open Space (PS). Under the NT Planning Scheme, the primary purpose of Zone CN is to “conserve and protect the flora, fauna and character of natural areas” and any “[d]evelopment... is [to be] sensitive to the natural features and habitats of the land, and located and operated to have minimal impact on the environment” (NT Planning Scheme 2020 at [4.23]). The primary purpose of Zone PS is to provide open space areas for public use and enjoyment (NT Planning Scheme 2020 at [4.17]). Identifying Glyde Point for major industrial development ignores the intended protection of this area, the significant environmental values, the current recreational use and enjoyment of this area and underestimates the commitment of the very broad community to maintain its current zoning use.

Key Recommendations

1. The NTG abandon plans for the Glyde Point industrial estate and associated massive residential development for 36,000 people.
2. The LSLUP and Darwin Regional Land Use Plan are both amended to reflect the abandonment of the plans described in recommendation 1, and, in particular, are amended to remove mention of a possible port and industrial area at Glyde Point, and to recognise the current zoning of the land at Glyde Point as Zone PS – Public Open Space, rather than the non-existent zoning category of “Strategic Industry”.
3. The NTG further examine the relative merits and benefits of a range of possible reservation, management and sustainable economic activity options for the whole area, such as Indigenous Protected Area/Marine Park/recreational fishing area 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.
4. The NTG plan for ecologically sustainable development in our existing communities and industrial areas, away from sensitive and pristine coastal environments and based on



appropriate, best practice, and transparent site selection criteria, instead of planning for a destructive, new, white elephant development.

Specific Comments

Active Recreation

We appreciate that the proposed updates to the wording around “Active Recreation” recognise the extensive use of the peninsula for informal recreation activities. However, the updated wording states that “recreational pursuits are recognised as valid uses to be balanced with development and preservation of the natural environment.” Recreational fishing and camping are at the heart of the Top End lifestyle. The Gunn Point, Glyde Point, Shoal Bay and the Vernon Islands region is one of the most valued and important recreational fishing areas for Territorians and is worthy of protection from overdevelopment, particularly dirty heavy industry. The proposed updated wording clearly suggests that these areas and their recreational fishing values can be compromised, can be 'balanced' with industrial development. This is not correct as some areas are too precious to lose, especially when alternate sites are available.

Recommendation: That the words “development and” be removed from the second sentence of the proposed paragraph about “Active Recreation”.

Commercial, Agricultural and Industrial Land Use

The report “Groundwater resources of the Gunn Point Area” (Woltmann 2020, page 21) focuses on the lower productive aquifer. This aquifer is essential for maintenance of the permanent groundwater dependent ecosystems at Bankers Jungle and Melacca Swamp. The rainforest at Bankers Jungle draws around half its water requirement from the lower aquifer late in the dry season (Liddle et al. 2008). A reduction in water supply from this aquifer is expected to negatively impinge on threatened rainforest species including the palm *Ptychosperma macarthurii* that occurs at this site. The proposed wording under the new point 18 relating to Agriculture Use states that “ the groundwater demand of land uses to not exceed the sustainable recharge of the aquifers” does not cater for long-term maintenance of these permanent groundwater dependent ecosystems. Sustainable recharge is not defined and while the water table may rebuild to former wet seasonal levels during the wet season, a failure of the permanent springs to keep flowing throughout the dry season will make the spring-fed rainforests vulnerable to fire impact as has happened at Whitewood Road Rainforest in the Girraween area (Liddle et al. 2006). The local population of *Ptychosperma macarthurii* at



Whitewood Road has collapsed following draw-down of the water table and increased incursion of fire into the rainforest.

Recommendation: That the first subpoint under the proposed point 18 be amended to say “require the groundwater demand of land uses:

(a) To not exceed the sustainable recharge of the aquifers; and

(b) To be set at such a level so as to not adversely impact permanent groundwater-dependent ecosystems.

Acknowledgement of Aboriginal Culture, and other Heritage values

We appreciate that the proposed updates to the LSLUP now include references to the long Aboriginal history in this area and the presence of archaeological and/or sacred sites. However, the proposed updates do not make clear the need to protect significant sites, nor do the proposed updates acknowledge that the slated development of dirty heavy industry would the Vernon Islands will be significantly impacted - an area recognised to be of the Tiwi people and of interest to the Larrakia people.

Recommendation: - That in the first subpoint under the new proposed point 29 (labelled “Culture and Heritage”) be amended to say “new development protects places and sites listed on the Northern Territory Heritage Register and /or sacred sites and other places of heritage interest”.

- ***That the proposed section labelled “Gunn Point Peninsula Aboriginal Cultural Heritage Values” be amended to note the likely deleterious impact of heavy industry on the Vernon Islands.***

Tourism

One of the aims of the proposed updates to the LSLUP is to “enable tourism ventures that respond to environmental, cultural and recreational opportunities”. However, mentions of tourism in the proposed updates are scant and when they do occur, they seem to relate to tourism development in the proposed Murrumujuk township. The proposed updates, and the current LSLUP, both ignore existing tourism operations in the area based on, for example, fishing, crabbing and exploring the Vernon Island reefs and blue holes. The opportunity for future tourism based the ecosystems of the region is high, especially given the proximity to Darwin. The proposed updates, with its continued emphasis on industrial and urban development ignore and jeopardises these tourism opportunities as such development would impact on the health of the environment and fish populations on which tourist operations rely.

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Recommendation: That the proposed updates be amended to include an acknowledgement of the tourism values of the area - fishing, coastal, reefs, and other natural features - and a requirement that these values are to be protected.

In conclusion, we urge the Planning Commission and the Northern Territory Government to consider our recommendations and create a new vision for the Gunn Point Peninsula, taking advantage of the significant cultural and environmental values of the region.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shar Molloy'.

Shar Molloy
ECNT
Co-Director

A handwritten signature in blue ink, appearing to read 'Kirsty Howey'.

Kirsty Howey
ECNT
Co-Director

A handwritten signature in black ink, appearing to read 'Adele Pedder'.

Adele Pedder
Marine Campaign Manager
Keep Top End Coasts Healthy

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References

Liddle, D.T., B.W. Brook, J. Matthews, S.M. Taylor, and P. Caley. (2006) 'Threat and Response: A Decade of Decline in a Regionally Endangered Rainforest Palm Affected by Fire and Introduced Animals'.

Biological Conservation 132, no. 3: 362–75. <https://doi.org/10.1016/j.biocon.2006.04.028>.

Liddle, D.T., D. Boggs, L. Hutley, D. Yin Foo, G. Boggs, D. Pearson, P.G. Cook, and L.P. Elliott. (2008) 'Biophysical Modelling of Water Quality in a Darwin Rural Area Groundwater Dependent Ecosystem'.

Woltmann, M. (2020) 'Mapping the Future Project - Gunn Point. Groundwater Resources of the Gunn Point Area'. Technical Report 5/2020. Department of Environment and Natural Resources. Darwin, NT, Australia.