

APPENDIX P

Supplement to the EIS

Introduction

In accordance with the NT EPA and DoEE guidelines, a draft EIS was displayed on public exhibition between 18 November and 1 February 2018. During this period, government organisations, non-government organisations and members of the public had an opportunity to provide comment on the draft EIS. Responses were received from the following Northern Territory Government advisory bodies including:

- Department of Environment and Natural Resources;
- Parks and Wildlife Commission;
- Department of Health;
- Department of Trade, Business and Innovation;
- Department of Attorney General;
- Department of Tourism (Heritage Branch);
- Aboriginal Areas Protection Authority;
- Department of Tourism and Culture;
- Police Fire and Emergency Services; and,
- Power and Water Corporation.

Comments were also received from non-Government organisations, corporations and members of the public including:

- Justin Tutty;
- Larrakia Development Corporation;
- Anna Gazzard;
- Grusha Leeman;
- Nick Fewster;
- Environment Centre NT;
- Nicole Bergs;
- Tom Poulson;
- Andris Bergs;
- Darwin Off-roach Cyclists Committee;
- NextGen Garamanak;
- Eric Garcia;
- Kylie Welch;
- Rebecca Spain;
- Deb Hall;

- Clara Penton; and,
- Kevin Costello.

Comments from these organisations and individuals have been summarised in the tables below with a response to how each comment has been addressed in the EIS. Responses have been provided as either:

- **Clarification:** information already exists in EIS to address comment. Sections within the EIS is provided of where relevant information exists. As a result, there are no changes to the EIS; or,
- **Change:** information has been added to the EIS to address comment. Sections within the EIS is provided where relevant information has been added.

Where comments received from different organisations and/or individuals relate to a similar issue, the comment has only been addressed once. Similar comments are cross-referenced to the section of the supplement where the change has been made.

Comments

Table 81. Justin Tutty

Comment #	Comment	Response
1.1	Concerned about loss of flora and fauna habitat	Clarification. The EIS acknowledges that there will be an impact on flora and fauna. Section 7 of the EIS describes the flora and fauna values within the project site in detail, as well as the potential impacts and measures to retain and minimise impacts to these values.
1.2	Unconvinced about need for new housing	Clarification. The Lee Point project has been developed in consultation with the NT Government and City of Darwin and community stakeholders with the objective of meeting all economic and social needs for the ongoing development of the City of Darwin as well as sustaining the financial milestones for a DHA community development. The DHA 10 year Capital Plan identifies an ongoing need for 30 per cent of land developed to be required for ongoing Defence Housing provisioning. The balance of the community lots will be required at a rate of approximately 100 per annum for ongoing household creation numbers. The suburb of Muirhead commenced development in 2011 and is in the final stage of construction and sale in 2018 with a total yield of 1184 lots, 30 per cent of which are allocated to Defence Housing. This equates to a demand of 200 lots per annum. The Lee Point project is identified by the Department of Infrastructure, Planning and Logistics 10 Year Infrastructure Plan as an integral part of the future growth and development of Darwin.
1.3	Proposed development is too large/tall and dense and in close proximity to conservation reserve where it might have negative environmental impacts on the reserve	Clarification. The potential impacts to the conservation reserve have been considered in detail in Section 7.
1.4	Offset arrangement is "poorly defined"	Change. Refer to Comments 17.7, 17.8 and 17.9.
1.5	Adverse water quality impacts on nearby creeks. Buffalo creek and Sandy creek	Clarification and Change. The project is fully sewered and drainage outflows are restricted to the current overland flows already existing on site. Baseline testing of nearby creeks and water courses is underway. The existing Stormwater Management Plans and Water Quality Monitoring Plan will ensure impacts to Buffalo and Sandy Creeks are minimised, with potential for an improvement in water quality at Sandy Creek. Water quality data collected

Comment #	Comment	Response
		during the public exhibition period has been included (refer to Appendices of Water Quality Monitoring Plan).
1.6	Sea level rise is not factored into design and management	Clarification. The project is well above sea level and there are no Q100 impacts or coastal surge impacts on the site. See Figure 12.
1.7	Inadequate attention to Larrakia cultural heritage	Change. Refer to Comments 2.1 – 2.7.
1.8	Report fails to acknowledge the impact on local traffic	Clarification. Traffic impacts from the project are considered in Section 6.2.3, Appendix K and Appendix L. The Traffic Impact Assessment reports have been prepared in accordance with Austroads <i>Guide to Traffic Management Part 12: Traffic Impacts of Development</i> .
1.9	Concerned domestic animals/pets will have an adverse impact on native fauna	Clarification. The management of domestic pets in residential developments is a matter for the City of Darwin and the NT Government to manage and legislation where required. See Section 7.3.2.13 regarding threat from domestic cats.

Table 82. Larrakia Development Corporation

Comment #	Comment	Response
2.1	Project should provide alternative areas of land on Larrakia Country for the appropriate offsets	Change. DHA are currently working with rangers from the Larrakia National Aboriginal Corporation to locate a suitable off-site offset on Larrakia land. A potential site at Cox's Peninsula has been identified. Further information on this offset proposal is provided in Section 7.5.2.
2.2	Initial Ecology and Heritage Partners report fails to reference the Larrakia people by name or any prospective cultural, tourism, heritage, or economic development opportunities.	Change. See first paragraph of Section 2.2, Section 8.4.5.1 and Section 7.2.4.5 for references to Larrakia people. See Table 46 and Section 7.3.2.11 for how Larrakia Development Corporation will be involved in heritage monitoring during works and preparation of interpretive signage. Section 8.5.3.3 has been updated to describe how the LDC and LNAC will be engaged during the project. Section 8.5.3.5 has been updated to describe benefits for existing tourism businesses run by traditional owners.
2.3	Lack of consultation with Larrakia Development Corporation (LDC) and the Larrakia Nation Aboriginal Corporation (LNAC) where Larrakia people can contribute to the project.	Change. Representatives from LDC and LNAC were consulted following public exhibition period. This included discussions on how these organisations can contribute to the project. LDC provided detailed explanation of range of services it can provide throughout life-cycle of project. LDC and LNAC will be directly engaged on project (refer to Comment 2.2.). Dates of consultation are provided in Section 8.4.6.
2.4	Consultation with LDC, the LNAC or the Kenbi Ranger Group to discuss environmental offsets for the Black Footed Tree Rat.	Change. Refer to Comment 2.1
2.5	DHA to consider elevating the LDC to a first point of preference for any number of Sub or lead contracting opportunities relating to the Commonwealth Indigenous Procurement Policy	Change. Refer to Comments 2.2 and 2.3. The LDC will be directly engaged for specific activities, and have been informed of opportunities to partner with primary contractor.
2.6	DHA and Northern Territory Government to consider prioritising discussions with the LDC for the development of any proposed affordable housing models for the proposed development models. This could include LDC leading discussions with the Yilli Rreung Housing Aboriginal Corporation and Ironbark Corporation	Clarification. The need for affordable housing in the Lee Point area and wider Darwin region for Larrakia people was discussed. While it is acknowledged that housing affordability is a significant issue for Larrakia people, it is beyond the reach of this project to address the problem.
2.7	Lack of Larrakia influence in the proposed tourism/hospitality components of the proposed development. This must advance the standing of Larrakia as traditional owners of the development area and its surrounds	Change. Refer to Comment 2.3.

Table 83. Anna Gazzard

Comment #	Comment	Response
3.1	Insufficient community consultation, community meeting poorly advertised	Clarification. Stakeholder consultation with the Government and local community has been undertaken, refer to Section 8.4.6 for details.
3.2	Proposed development will have negative visual and related aesthetic impact on the area.	Clarification. As discussed in Chapter 2 and Section 8.4 the project is based on single level dwellings for the residential component with one dwelling per lot prerequisite with a maximum height of 2 storeys as per the NT planning scheme and project design parameters. In accordance with the approved rezone in 2015, there is a General Use and Multi Use sector which are 3 storeys and 4 storeys height limit respectively. The Tourism Precinct sites are to revert to the NT Govt. for short term tourist hotel type accommodation with designated heights in accordance with the approved rezone.
3.3	No economic case for project construction	Clarification. The project is a designated growth area under the Darwin Vibrant Future plan and forms part of the 10 year infrastructure plan for the future of Darwin. The economic demand for the project are addressed in Section 8.5.
3.4	Land clearing for this development would remove critical fauna habitat (particularly in Lot 4873)	Clarification. Impacts to fauna including threatened species have been considered in detail in Sections 7.2.4, 7.3 and 0.
3.5	Rejection of the statement that “in the Draft EIS that the Casuarina Coastal Reserve would provide a sufficient corridor for the movement of wildlife.”	Change. The role of Casuarina Coastal Reserve as a wildlife corridor is outlined in the reserve’s management plan. The Casuarina Coastal Reserve Management plan is now referenced in Table 48
3.6	Development will only further fragment the remnant vegetation	Clarification. Fragmentation impacts have been addressed in risk assessment (Table 47).
3.7	Development needs to consider sea level rise	Clarification. Refer to Comment 1.6.
3.8	Increased people traffic in the area will have negative consequences especially in the Casuarina Coastal Reserve and beach adjacent to the proposed development	Clarification. The potential impacts of increased human visitation along the Casuarina Beach is acknowledge with mitigation measures to address these impacts. See 'human disturbance' impact under risk assessment, as well as sections 7.3.2.7, 7.3.2.8 and 7.3.2.9.

Table 84. Grusha Leeman

Comment #	Comment	Response
4.1	Darwin Harbour Report Card 2016 was missing from report.	Change. The 2016 report card was not published until after the public exhibition period commenced. Figure 14 has been updated with 2016 report card.
4.2	Sea level rise will negatively effect the proposed development	Clarification. Refer to Comment 1.6.
4.3	Need for baseline monitoring of Sandy Creek	Change. Water quality monitoring for Buffalo Creek and Sandy Creek commenced during the public exhibition period. Results from the monitoring included in WQMP (Appendix O).
4.4	Aboriginal heritage needs more attention. No mention of traditional owners of Larrakia in the EIS the 50 metre wide transect was inadequate	Change. Refer to comments 2.1 to 2.8.
4.5	Removal of trees negatively effects local environment and fauna habitat	Clarification. Removal of fauna habitat has been considered in detail in Section 7.3.
4.6	Lack of weed management is an issue, levels on site are too high especially Gamba grass	Clarification. The presence of Gamba grass and other weeds has been acknowledged. DHA have been undertaking a weed management program on site as mentioned in Table 57.
4.7	Roads in the area need to be widened including Lee Point Road. This included the addition of pedestrian crossings	Clarification. Road design is in accordance with Austroad road design principles and is subject to review and approval by the City of Darwin and NT Department of Transport (as is incorporation of pedestrian crossings).
4.8	Limit domestic animals access to Casuarina Costal Reserve and new suburbs	Clarification. Refer to Comment 1.9.
4.9	Extend rear of the Lee Point Village Reserve to already cleared land	Clarification. The project area is in accordance with the approved rezone of 2015.
4.10	Poor housing design. Issues with heat and airflow in Lyons and Muirhead, no insect screens.	Clarification. All housing is constructed under strict design guideline parameters and thoroughly policed. All housing is cyclone rated and all Defence dwellings are constructed to additional Defence compliance standards including air conditioning in addition to fans, louvres, and breezeways. Defence houses require security screens with insect mesh to all dwellings

Table 85. Nick Fewster

Comment #	Comment	Response
5.1	Fauna Habitat removal. Development clears land of the EPBC listed Black Footed Tree Rat and places pressures on EPBC listed migratory bird species.	Clarification. Potential impacts to Black-footed Tree-rat and Migratory shorebirds have been addressed in Section 7.4.1.
5.2	No baseline data on the Floodplain Monitor, waterway health or management strategies waterways to indicate changes to that system from the development.	Clarification and Change. Water health addressed through Stormwater Management Plans (Appendix E and Appendix F) and Water Quality Monitoring Plan (Appendix O). Refer to Comment 4.3 regarding baseline monitoring of Sandy Creek and Buffalo Creek. Floodplain monitor was not recorded during the various field surveys. Targeted surveys were not completed for this species. The likelihood assessment in Table 44 considers the species 'may' occur in the project site. If so, it is likely to be found in environs close to Sandy Creek and Buffalo Creek that will not be impacted by the project. Further the species is likely to disperse from the site at its own accord if construction activities do impact on species' habitat. Likelihood of occurrence description in Table 44Table 47 has been updated accordingly.
5.3	Other stages of Defence Housing adjacent have completely cleared the remnant forest site and planted new trees.	Clarification. Greening Australia undertook an environmental stocktake and harvested seeds from native species and harvested seeds from native species and propagated trees for replanting throughout the Muirhead 'Breezes' project.
5.4	Unclear if development will retain mature trees within the street scapes	Clarification. Due to ongoing disturbance from fire, as well as historic military uses, most trees are immature. Cycads will be salvaged and incorporated into landscaping.

Table 86. Power and Water Corporation

Comment #	Comment	Response
6.1	There is currently no water or sewer infrastructure in this area. PWC has no current program to provide reticulated water or sewerage to this, or any other development in the adjacent areas.	Clarification. The subject parcels are not currently services however reticulated water and sewerage services are available in the area and the proposed developments can be services with headwork upgrades.
6.2	Any Development above 28.0m AHD ground level is not an acceptable option without major headwork upgrades.	Change. It is agreed that headwork upgrades are required to service development above 28.0 m AHD. The proponent is working with PWC on this issue and both parties agree that there are options to address this. See changes to Section 6.2.1.
6.3	The proposed development (2CRU) may exceed the total 1675 EP load allocation for the ultimate 2CRU development & 1623 EP allocation for ultimate Muirhead North development	Clarification and Change. Updated EP load calculations based on the current development layouts have been presented to PWC. The projected EP loadings for 2CRU and Muirhead North are 2,053 and 851 respectively. The total EP's are less than the combined EP allocation for both sites. The EP loading discharging to the Lyons SPS from the 2CRU west catchment is 567. This exceeds the DCP EP allowance by 3%. It is acknowledged that the proponent will be required to undertake minor upgrades to the Lyons SPS. The EP loading discharging to the Muirhead SPS from the 2CRU east catchment and Muirhead North is 2,337, which is less than the DCP EP allowance of 2,747. See changes to Section 6.2.2.
6.4	There is no Master Plan Report or Headwork upgrading proposals for the entire area covering 2CRU & Muirhead North development.	Clarification. The proponent is working with PWC to determine headwork requirements for the entire area covering 2CRU and Muirhead North. Both parties agree that suitable solutions are available and will be documented to PWC's satisfaction.
6.5	A sufficient sewerage and water services plan must be provided to PWC from the proponent, consistent with the proposed development plans, to the satisfaction of PWC	Clarification. Sewerage and water services plans will be updated in consultation with PWC during the DA stage.
6.6	Consideration of reuse/recycle systems will require formal engagement with Power and Water Services and the regulator, the Department of Health,	Clarification. Neither the proponent nor PWC are currently proposing any reuse/recycle systems.
6.7	Water for construction purposes may not be available from all existing PWC mains in this area due to network constraints.	Clarification. Possible constraints on water for construction purposes are noted. Any constraints or limitations will be agreed prior to construction.

Comment #	Comment	Response
6.8	Section 2.4 discussed future extensive development proposal without any consideration of overall Developers Master Plan & Headwork upgrading requirements. It also did not address EP load & Maximum Ground Elevation limitation for such development.	Clarification. Section 2.4 of the EIS is intended to provide a general description of the proposed development in the context of the Lee Point Area Plan. Infrastructure requirements are addressed in Section 6.
6.9	The overall 2 CRU proposals prepared without consideration of maximum 28.0m Ground level restriction or addressing how the Infrastructures will be developed to support the development in various stages.	Change. Refer to comment 6.2.
6.10	The proposed water servicing approach described in Section 6.2.1 of the Draft EIS document is not formally confirmed or accepted by PWC and cannot be used for proper modelling assessment as proposed without further clarification with PWC.	Clarification. The proponent is working with PWC to determine the best water servicing approach for short and long term needs. Both parties agree that suitable solutions are available and will be documented to PWC's satisfaction.
6.11	PWC has no fund allocation to construct Marrara Elevated Tank as proposed. However, the proposed 2CRU development would tiger construction of such Elevated Water Tank to meet minimum pressure requirements.	Clarification. The proponent is working with PWC on headworks options and triggers and is open to making a fair contribution to the proposed Marrara Elevated Tank and/or addressing short term requirements with a booster pump station and ground level storage.
6.12	Current & ultimate boundary condition with available pressure proposed in the report is not valid and cannot be used to assess internal or external headwork requirements as proposed.	Clarification. The boundary conditions stated in the EIS were provided by PWC. The proponent has discussed this with PWC and it is agreed that the modelling can be updated to reflect any change in conditions advised by PWC.
6.13	A detail overall Master plan with water & sewer Network proposal required from developer based on agreed boundary condition & strategy to develop the entire area. DN 200 reticulation pipe is not PWC standard size and cannot be used as proposed.	Clarification. The proponent is working with PWC to determine overall water and sewer requirements for the entire area covering 2CRU and Muirhead North. Both parties agree that suitable solutions are available and will be documented to PWC's satisfaction. As determined by hydraulic modelling DN200 is the minimum required pipe size to service some sections of the reticulation network. For construction DN225 pipe will be used in these locations in accordance with PWC standards
6.14	Pressure Booster system is not PWC preferred headwork option and is not acceptable to current PWC Standard as a suitable alternative option to replace Elevated Storage Tank as proposed.	Clarification. Please refer to comment 6.11.
6.15	Section 6.2.2 The proposed ultimate 2106 EP load discharge to Muirhead SPS must be the total EP load allocation from both 2CRU & Muirhead North Development. This must be clarified in the Master Plan Report.	Clarification and Change. Please refer to comment 6.3.

Comment #	Comment	Response
6.16	Section 6.2.2 There are no plans by Power and Water Corporation to upgrade the existing plant apart from its current investment of \$15.4 million in constructing new inlet works.	Clarification and Change. It is understood that LSWSP has spare capacity of approximately 22,000 EP's and no upgrade is required to service the proposed development. See changes to Section 6.2.2.

Table 87. Environment Centre NT

Comment #	Comment	Response
7.1	Apartment vacancy rates in Darwin and surrounds have risen substantially, population growth needs to be approached thoughtfully.	Clarification. Refer to Comment 1.2.
7.2	Concerned that this sensitive and valued area may be cleared without the current demand to match all of Darwin’s planned and in construction housing projects.	Clarification. Refer to Comment 1.2.
7.3	Most of the economic stimulus for this project will be temporary during the construction phase of the new suburb. We wonder if there are other projects that would be more suited to this area that would create long term social, ecological and economic outcomes.	Clarification. Refer to Comment 1.2.
7.4	Defence Housing Australia, housing design issues. design to reduce stormwater runoff and minimum design principles applicable to tropical housing design, to reduce the reliance on air conditioning	Clarification. Refer to Comment 4.10.
7.5	Removal of native remnant vegetation and associated Fauna habitat reduction. Black-footed tree-rat habitat	Clarification. Impacts to native fauna and Black-footed Tree-rat are considered in detail in Section 7.
7.6	Loss of biodiversity and slow growth of re-veg sites in the monsoonal climate of Darwin.	Clarification. Refer to Comment 7.5 regarding loss of biodiversity. Slow growth of revegetation is a valid point to raise. However, there are numerous successful revegetation projects in the Darwin area including on DHA sites.
7.7	Baseline water quality monitoring and management of Sandy Creek, when, how funding and release of results to public	Clarification and Change. Water Quality Monitoring Plan (Appendix O) has been updated to state that funding will be by DHA and that annual monitoring results will be published on DHA’s website and submitted to the NT EPA and DoEE. Water Quality Monitoring Plan (Appendix O) and Stormwater Management Plans (Appendix E and F) outline how water quality will be managed and monitored.
7.8	Water quality issues of Buffalo Creek including stormwater runoff from the study area and release of information surrounding this issue	Clarification. Refer to Comment 7.7 regarding Stormwater Management Plans.
7.9	The decision to not impose rainwater tank requirements, nor incentives to reduce paving and roof size is disappointing.	Clarification. The project is subject to the approval of City of Darwin and NT Government development standards with regards to paving and rainwater tank requirements. The project is compliant with these standards.

Comment #	Comment	Response
7.10	Implementation of water sensitive urban design features	Clarification. Table 11 and Table 47 provide details of how Water Sensitive Urban Design has been incorporated into the project.
7.11	Further detail is required regarding monitoring of the health of the monsoon rainforest to determine whether stormwater flows are appropriate for sustaining the patch. This information should be made publicly available	Change. Refer to comment 17.11.
7.12	We urge testing to be done for acid sulphate soils for all stages of the project, despite the elevations of the site	Clarification. Acid-sulphate soil testing will be undertaken in Stage 2B only under the direction of a suitably qualified environmental scientist, for reasons explained in Section 53
7.13	We question whether there is a conflict between the 'biting insect management plan' (limiting tree cover to 10%) and habitat for the black-footed tree-rat.	Clarification. Thinning in the esplanade area is a Department of Health requirement to address biting insect requirements. DHA have accounted for these losses as part of the impact and offset calculations for Black-footed Tree-rat (see Section 7.5).
7.14	Habitat mapping at 2CRU. When will this deficit of the habitat mapping be addressed and how will the results be made public? What opportunities will there be for public comment on this additional habitat mapping.	Change. The detailed habitat mapping for Black-footed Tree-rat in 2CRU is no longer proposed and this statement has been removed from the EIS. More detailed habitat mapping was proposed because the current habitat mapping was considered course and over-estimated the extent of suitable Black-footed Tree-rat habitat on 2CRU by not differentiating between access tracks and woodland.
7.15	Areas of prime habitat (7/10 and 5/10) for the threatened black-footed tree-rat exist on the eastern side of the 2CRU. This habitat should be preserved.	Clarification. The project does avoid impacts to areas of BFTR habitat. As described in Section 7.3.2.1, 21.95 and 0.88 hectares of habitat for BFTR will be retained with 2CRU and Muirhead North respectively. No further retention of BFTR habitat could be included without compromising the viability of the project.
7.16	Domestic cat control within the Lee Point suburb and domestic cat predation of native fauna	Clarification. Refer to Comment 1.9.
7.17	Lack of survey for Floodplain Monitor and threat form cane toads.	Change. Refer to Comment 5.2.
7.18	Health of the seasonal watercourse that flows into the monsoon rainforest present in Muirhead North	Clarification. The seasonal watercourse and health of the Monsoon Rainforest present in Muirhead North is fully preserved. See Section 4.3.2.2 and Stormwater Management Plan (Appendix F).
7.19	In reserving the Monsoon rainforest (0.88ha) within a 1.57ha area, will this be a big enough to protect the patch of Monsoon rainforest? Should there be a larger vegetated buffer zone around the rainforest?	Clarification. The Monsoon Rainforest will be preserved within a buffer area of 3.87 hectares. The key environmental factor for preserving the Monsoon Rainforest is hydrology, and the stormwater management plan have been designed to preserve flow to the area.

Comment #	Comment	Response
7.20	What assessment criteria will be used to ascertain if this vegetation is retained?	Clarification and Change. Monitoring the health and extent of native vegetation is described in Section 7.3.2.10. Refer to Comment 17.11 regarding additional information provided on monitoring of retained vegetation.
7.21	The EIS states that it is expected that 'native vegetation in the rural lots...will be partially retained...'. There is nothing in place to ensure that native vegetation, and habitat will be retained	Clarification. This statement is based on similar sized lots in Darwin area. DHA cannot require landowners to retain all native vegetation on rural lots.
7.22	We contend that clear-felling native vegetation does substantially alter the landscape features, even if some of the 2CRU is already heavily degraded.	Clarification. The significant impact assessment for landscape features was done in accordance with EPBC Act guidelines (See Table 52). In accordance with these guidelines, the project was not considered to have a significant impact on landscape features.
7.23	Suitable fencing would allow for the movement of native animals and prevent larger animals like dogs from accessing the area being conserved	Clarification. Fencing is in accordance with City of Darwin and NT Government design guidelines.
7.24	Lack of public exposure of the Casuarina Coastal Reserve Landcare Group	Change. The Casuarina Coastal Reserve Landcare Group will be consulted during preparation of the management plans for the 21.95 hectare conservation reserve. See last paragraph in Section 7.3.2.1.
7.25	Migratory shorebird education and monitoring signage has been in place at Buffalo Creek and Lee Point for some years and proven quite ineffective. Predation of the birds from disturbance by dogs.	Clarification and Change. The effectiveness of the existing signage has been considered when determining migratory shorebird signage and awareness. However, the signage and awareness program was a recommendation of an independent migratory shorebird expert (see Appendix N). Last paragraphs in Section 7.3.2.7 and Section 7.3.2.8 have been added describing how the involvement of NT Parks and Wildlife Commission will lead to a better outcome.
7.26	Clearing of vegetation including introduced species could have adverse impact to the Black-footed Tree-rats. Lack of details regarding offsets for the Black-footed Tree-rat.	Clarification and Change. Impacts to Black-footed Tree-rat have been discussed in detail in Sections 7.2.4.3 and 7.4.1.2. Refer to Comment 2.1 regarding additional information that has been provided in relation to Black-footed Tree-rat offsets.
7.27	Management of weeds if the integrity of the conservation areas is to be retained.	Clarification. An extensive weed management program focussing primarily on Gamba grass is already underway. First paragraph of Section 7.3.2.1 states that weed management works will be carried out in conservation area.
7.28	Housing developments in less sensitive areas should be prioritised first and this area be developed last and only when there is a pressing need for housing.	Clarification. The Lee Point masterplan has been developed in full consultation with the CoD, NT Govt., and the greater Darwin community prior to being rezoned and is now part of the Darwin 10 year growth plan to meet housing growth requirements.

Table 88. Nicole Bergs

Comment #	Comment	Response
8.1	Preservation of reserves (such as those found at Casuarina and Lee Point)	Clarification. An additional 21.95 hectares of DHA-own land will be transferred to NT Government and will be managed by Parks and Wildlife Commission as part of Casuarina Coastal Reserve.
8.2	Lack of public awareness of migratory bird habitat	Clarification. Section 7.3.2.8 discusses proposal to increase awareness and migratory shorebird habitat.
8.3	Water quality of Buffalo Creek and effort to maintain its current standings as to not change the patterns of the swordfish.	Clarification. Water quality impacts to Buffalo Creek will be managed in accordance with Stormwater Management Plan. Water quality will be monitored in accordance with Water Quality Monitoring Plan (Appendix O) to ensure no deterioration in water quality.
8.4	Other native wildlife which reside in this area have also not been mentioned. Will there be a survey conducted in the near future to determine reptile population numbers? How will their population be supported through the certain introduction of household pets including cats and dogs?	Clarification. Numerous surveys have been undertaken to establish fauna presence in area. See Section 7.2.4.1 for a summary. No further surveying is proposed. See Section 7.3.2.13 regarding threat from domestic cats.
8.5	How will planning ensure that the water feeding the rainforest in the wet season is the same quality as that which it is currently?	Clarification. Water quantity not water quality is the key determining factor in maintaining health of Monsoon Rainforest patch in Muirhead North. Please refer to Section 4.3.2.2 for description of drainage design to maintain hydrology to Monsoon Rainforest.

Table 89. Tom Poulson

Comment #	Comment	Response
9.1	Foul smell of Leanyer-Sanderson water treatment plant. Our concern is that the proposed development will worsen this problem.	Change. See changes to Section 5.2.2 and 5.3.2.
9.2	Taken into account the high number of properties currently available for rent in the Northern Suburbs, I see little value in clearing more land to make space for new houses	Clarification. Refer to Comment 1.2.
9.3	The creation of this new urban development will bring more domestic animals to the area. My particular concern are the possible increased abundance of cats in areas next to a coastal reserve.	Clarification. See Section 7.3.2.13 regarding threat from domestic cats.

Table 90. Andris Bergs

Comment #	Comment	Response
10.1	Project rationale is lacking, unsure if demand for the housing being generated by the project will be used.	Clarification. Refer to Comment 1.2.
10.2	This assessment does not explain over what period of time the \$350 million would be generated; which of the jobs would be temporary; or the business modelling around the entertainment industry and education.	Clarification. Staging Plan is provided in Table 3. The Lee Point project will be completed over a 10-year timeframe with consequent entertainment, retail and education and community facilities evolving with the development's implementation.
10.3	It does not factor in the costs to taxpayers of the development; the opportunity costs of government funds being diverted directly to this project and to mitigating its broader effects on the Darwin community; or those existing jobs which might be lost or relocated through the creation of the new school, shopping centre and tourist / entertainment region.	Clarification. DHA will fund the development from its own capital resources and return a dividend to treasury in accordance with its operating charter
10.4	Potential implications for fauna and flora. Floodplain Monitor, Black-Footed Tree -Rat, and to the various migratory bird species which visit CCR. Threats to Darwin Cycad were not considered significant.	Clarification. Impacts to biodiversity considered comprehensively in Section 7, including for Floodplain Monitor, Black-footed Tree-rat and Migratory Shorebirds.. Regarding Darwin Cycad, the significance assessment was only completed for nationally significant species. Darwin Cycad is threatened a territory level only and there are no significance assessment guidelines under NT legislation or policy
10.5	There was little regard to the longer-term implications of the development on the water quality of Buffalo Creek	Clarification. Water quality monitoring will be undertaken in Buffalo Creek (see Appendix O). There is considered a low risk to water quality in Buffalo Creek due to the existing poor water quality conditions in Buffalo Creek (see Figure 14) proposed Stormwater Management Plans (Appendix F) and ESCP (Appendix D). Any impacts are most likely to be detected during the construction phase of the project (i.e. within 10 years of construction commencing). Any exceedance of stated Water Quality Objectives (WQOs) will trigger a modification to stormwater management.
10.6	Benefits of proposed 'environmental offsets' to the region were not detailed.	Change. Refer to Comment 2.1
10.7	Consideration ought to be given to fencing the boundary of the development with CCR to help prevent informal tracks being created by those residents. A suitable barrier may also serve to reduce predation on wildlife in CCR by domestic cats and dogs.	Change. Fencing is proposed along top of escarpment. See first paragraph in Section 7.3.2.1. Fencing will be in accordance with City of Darwin and NT Government standards. See Section 7.3.2.13 regarding threat from domestic cats.
10.8	Increase in traffic is a concern also related road safety issues connected with the increase in population due to the project development	Clarification. Traffic Management Plans have been prepared. Traffic impacts considered in Section 6.2.3 (and Appendix K and L). The project design provides for the majority of traffic to enter and exit the master-planned

Comment #	Comment	Response
		<p>project via roundabouts on Lee Point road. The project provides for significant funding upgrades to Lee Point road in consultation with responsible authorities. There is a proposed bus link from Lyons and Darwin Hospital precinct at the request of the NT Dept. of Transport. NB- Tambling Terrace is a designated arterial road linking Lee Point road to Darwin Hospital</p>
10.9	<p>The likely impacts to the Darwin community beyond the development site do not appear to have been considered in detail and therefore not addressed.</p>	<p>Clarification. Social and economic impacts (positive and negative) have been considered in detail in Section 8.</p>

Table 91. Darwin Off-road Cyclists Committee

Comment #	Comment	Response
11.1	Development of the suburb will result in direct social impacts for the community which have not been identified in the EIS and require mitigation.	Clarification. Refer to Comment 10.9.
11.2	Mountain Bike Tracks will be unusable if development is approved and constructed.	Clarification and Change. A mountain bike is proposed along the western boundary of the project site. Further information is provided at the bottom of 6.2.3.3 regarding the mountain bike track, which the NT Government will be the lead agency. The project does not provide any intention of impacting on existing mountain bike tracks on NT Government land. The access track from the project site to Casuarina Beach will be designed so as not to interfere with mountain bike tracks.

Table 92. NextGen Garamanak

Comment #	Comment	Response
12.1	Lack of consultation with traditional owners in particular with Larrakia members	Change. Refer to Comment 2.3.
12.2	Desecration of registered/recorded sacred sites and the ongoing illegally obtained 'consent to destroy an archaeological site'	Clarification and Change. As discussed in Section 7.2.4.5, there are no registered sacred sites in the project site. Section 7.3.2.12 has been updated to reflect the work AAPA undertakes with custodians of sacred sites to ensure they are protected. Table 5 of CEMP updated as well.
12.3	Outright objection	Clarification. DHA firmly believes the project will be undertaken in accordance with all legitimate community concerns and the public interest will be well served by the development.
12.4	Land stealing	Clarification. DHA acquired the site from the Department of Defence under a legally binding contract as the legitimate freehold owner.
12.5	No follow-up to paragraphs "ToR 5.4"	Clarification. Section 5.4 of the Terms of Reference has been addressed in the EIS in Sections 7.2.4.5, 7.3.2.12, 7.4.2.3 and 7.4.2.4, and Table 5 of the CEMP.

Table 93. Erica Garcia

Comment #	Comment	Response
13.1	Oversupply of houses in Darwin	Clarification. Refer to Comment 1.2
13.2	Negative effects of clearing native bushland	Clarification. The impacts to native vegetation clearing are considered in Table 47, with mitigation measures proposed in Section 7.3.2.1. and Table 2 of the CEMP.
13.3	No consistent water quality monitoring of Sandy or Buffalo Creek.	Clarification. The Water Quality Monitoring Plan (Appendix O) has been prepared with reference to ANZECC guidelines for Water Quality Objectives (WQO). A specialist consultancy firm will be engaged to undertake the water quality monitoring to establish baseline conditions and whether any changes to the WQO is required. The WQO are likely to be different for Buffal Creek and Sandy Creek however the monitoring method is the same.
13.4	Loss of black footed rat habitat	Clarification. Impacts to Black-footed Tree-rat are addressed in Section 7.2.4.3 and 7.4.1.2. Impacts to the species will be offset in accordance with the Commonwealth Offset policy (see Section 7.5).
13.5	Could cats be excluded from the new suburb?	Clarification. See Section 7.3.2.13 regarding threat from domestic cats.
13.6	Black footed rat habitat offset plan is lacking detail	Change. Refer to Comments 17.7, 17.8 and 17.9.
13.7	No Floodplain Monitor surveys were conducted. There are no measures listed in the report about monitoring or protecting this reptile	Change. Refer to Comment 5.2
13.8	Threats to migratory bird habitat.	Clarification. Impacts to migratory birds is addressed in Sections 7.2.4.3 and 7.4.1.3, while mitigation and avoidance measures are discussed in Sections 7.3.2.7 and 7.3.2.8 and Table 2 of the CEMP.

Table 94. Kylie Welch

Comment #	Comment	Response
14.1	Odour impacts from Leanyer-Sanderson Wastewater Treatment Ponds are greater than stated in report	Change. See changes to Section 5.2.2 and 5.3.2.
14.2	Lack of pedestrian/cycle connections into the adjacent suburbs.	Clarification. The pedestrian bikeway corridors are extensive within the project and connect in to Lyons and the location preferred and requested following detailed community consultation (see Section 8.4.6) and by the respective responsible authorities, i.e. City of Darwin and Department of Transport.
14.3	Increased traffic volumes need greater speed control through Lyons past the main parkland areas	Clarification. Traffic Impact Assessment reports have been prepared in accordance with Austroads guidelines (Appendix K and Appendix L). The bulk of the Lee Point traffic will access directly on to Lee Point road with only minor volumes to utilise the Lyons connection and speed control will continue to be the responsibility of the City of Darwin, Department of Transport and NT Police force.
14.4	The EIS doesn't make it clear that the construction of a new school would be the responsibility of the NT Government. The short to medium term impact on these schools has not been considered in the assessment of social impacts associated with the development.	Clarification and Change. First paragraph of Section 8.4.2 has been updated to make it clear the NT Government will be responsible for building the new school. The timing of when the school will be constructed is the responsibility of the NT Government.
14.5	Biting Insects is a key risk that has not been adequately addressed in the Draft EIS. Explain how each of the Medical Entomology recommendations will be addressed, what role the developer will play and what will be left up to NTG to address.	Clarification and Change. The EIS has been prepared to comply with the recommendations of the biting insect management plan (Appendix G). Further information has been provided on how design of project meets biting insect requirements, including third paragraph below Table 12 (discharge rates and location), Table 47 (vegetation management to reduce biting insect risks) and Section 7.3.2.4 (infilling of gully erosion). Biting insects is already discussed in Section 6 of the CEMP.
14.6	Lack of detail relating to funding of drains all the way through to the tidal sections of Sandy Creek and excising these from the Coastal Reserve so that they can be adequately managed.	Clarification. Section 4.3.2.2 provides details on the drainage system which will be constructed to ensure run-off rates do not exceed pre-construction levels. DHA will be responsible for construction and management of drains in accordance with City of Darwin and NT Government design standards. Detailed designs will be provided during the Development Assessment stage.

Comment #	Comment	Response
14.7	Stormwater Management Plan that finishes at the site boundary is inadequate to address the complexities of biting insect management in the area.	<p>Clarification. The NT Government Entomology Department have been fully consulted and have conditioned the project with design parameters to ensure compliance with biting insect interaction in accordance with Northern Territory Government policy. The drain will discharge within the tidal section of Sandy Creek and Buffalo Creek to prevent pooling of water that may provide for breeding insects.</p>

Table 95. Rebecca Spain

Comment #	Comment	Response
15.1	General concerns with impacts to native flora and fauna.	Clarification. Impacts to biodiversity, including proposed avoidance, mitigation and offsetting measures are addressed in detailed in Section 7.

Table 96. Deb Hall

Comment #	Comment	Response
16.1	Can the clearing of more woodland be justified?	<p>Clarification. The project has been designed to retain as much native vegetation as possible. Approximately 110 hectares of degraded native vegetation that is common to the region will be cleared. The vegetation is also of a poor quality, particularly in 2CRU. All sensitive vegetation types, i.e. Monsoon Vine-thicket and Monsoon Rainforest, will be retained, conserving approximately 22.5 ha of native vegetation on site.</p>

Table 97. Department of Environment and Natural Resources

Comment #	Comment	Response
17.1	In the Supplement, please outline how surface water runoff from stage 1A and 1B would be managed prior to the construction of the drainage reserve in Stage 2B.	Change. To ensure compliance with Stormwater Management Plan, development of drainage system and treatment train will need to be carried out in early stages of project. See Staging section added to bottom of Section 4.3.2.2 for further details.
17.2	In the Supplement, please outline how surface water runoff from stages 2A and 3 would be managed prior to construction of the drainage reserves	Change. Refer to Comment 17.1.
17.3	The draft EIS does not discuss other aspects of the hydrology that would change as a result of the Project. In particular, there is likely to be increased runoff quantity due to greater areas of impervious surfaces. The Supplement should discuss the potential impacts of this increased runoff to Sandy Creek, the monsoon vine thicket and Buffalo Creek	Clarification. The risk associated with increased run-off is addressed in detail in Section 4.3. Management of stormwater will ensure no increase in run-off compared to pre-construction levels. See Section 4.3.2.2, Appendix E and Appendix F for further details.
17.4	The Supplement should identify any risks and potential impacts to the environment (erosion/scouring, vegetation change, waterlogging and creation of habitat for biting insects, etc.) associated with increasing the quantity of water being discharged from the site, increased discharge time and reduced rate from drainage reserves for Sandy and Buffalo Creeks and sensitive vegetation.	Clarification. As stated in Section 4.3.2.2, the stormwater treatment train has been designed to ensure no change in peak flows discharging into Sandy Creek and Buffalo Creek, and detention basins have been designed to retard flow and prevent erosion and scouring.
17.5	The report provides a summary of the results of previous surveys in the local region but does not provide information on the significance of <i>M. gouldii gouldii</i> habitat at 2CRU/Muirhead North in a regional context. Provide a regional assessment which identifies suitable/occupied habitat and dispersal corridors for the species.	Change. Final paragraph of Black-footed Tree-rat section in Section 7.2.4.3 added to discuss regional context of population of Black-footed Tree-rat.
17.6	The risk assessment proposes the use of boundary mesh fencing to prevent black-footed tree rats from entering the site. It is noted that this measure is unlikely to be effective due to the arboreal nature of the species which is adept at climbing. The outcome in the risk assessment needs to be revised with more appropriate avoidance measures identified in the Supplement.	Clarification. This measure was only proposed to avoid the species moving across Lee Point Road. There is no canopy connectivity across Lee Point Road, so animal proof fencing is considered suitable to prevent the species moving from established areas of habitat in Muirhead North into 2CRU during clearing.
17.7	In the Supplement, outline how the offsets proposed in the draft EIS address that policy and demonstrate that it will adequately compensate for the loss of <i>M. gouldii gouldii</i> individuals and habitat.	Clarification and Change. Section 7.5 provides detail regarding how the offset complies with policy on basis of calculation. Further information is provided on how the payment system to a 3rd party contributes to policy.

Comment #	Comment	Response
17.8	Section 7.5 of the draft EIS proposes the funding of \$4500 for each hectare of <i>M. gouldii gouldii</i> habitat removed for the development. As the proposed offset is based on the Eastern Leases Project approval, clarify why the proposed offset only applies for habitat for <i>M. gouldii gouldii</i> and not all native vegetation cleared for the development. In the Supplement, clarify whether DHA intends to offset the loss of all native vegetation or only habitat for <i>M. gouldii gouldii</i> .	Change. See third paragraph of Section 7.5.2.
17.9	The draft EIS is unclear with respect to the scope and benefit of land management works that would be funded through this offset. It is recommended that DHA provide costings of the types of works that would be undertaken, an estimate of the cost and likely benefit for <i>M. gouldii gouldii</i> in the Supplement.	Change. See first paragraph of Section 7.5.2.
17.10	The amount of habitat for <i>C. armstrongii</i> impacted by the development has not been quantified in the draft EIS. For the purposes of assessing the Project's impact to the species, provide quantities of the areas (in hectares) mapped as having none, low and moderate densities of <i>C. armstrongii</i> (Figure 33 of the draft EIS).	Change. See new Table 43.
17.11	Provide further detail on the person(s)/agency that would be responsible for monitoring the rainforest patch, the monitoring methods, trigger values and additional actions if the development is having an impact.	Clarification and Change. Monitoring method is described in Section 7.3.2.10 and Section 5 of the CEMP. Trigger values and reporting requirements added to these sections.
17.12	In the Supplement, provide the total amount of monsoon vine thicket within 2CRU (including areas zoned CN) and provide an estimate of the area that would be disturbed as a result of the development (including detention basins and erosion stabilisation works).	Clarification and Change. The conservation area is 21.95 ha. The area of Monsoon Vine-thicket to be retained in the conservation area is 20.1 hectares, the rest is Low Eucalypt Woodland. Report altered throughout to provide consistency. Due to existing impacts, the erosion stabilisation works are not considered to reduce area of Monsoon Vine-thicket. Approximately 0.5 ha of Monsoon Vine-thicket will be removed as part of construction of detention basin in south-west of 2CRU.
17.13	In the Supplement, please map and clearly identify the area of monsoon vine thicket that would be protected. Furthermore, provide details on the size of the vegetated buffer between the outer edge of the 'Conservation Area' and the monsoon vine thicket.	Clarification and Change. The Conservation Area and Monsoon Vine-thicket are the same, as such there is no buffer between the two. Refer to Comment 17.12 regarding Monsoon Vine-thicket loss.
17.14	In the Supplement clarify the total area of monsoon vine thicket that would be impacted for all components of the development (including erosion control and detention basins).	Change. Refer to Comment 17.12

Comment #	Comment	Response
17.15	In the Supplement, provide further detail around who would be responsible for undertaking the annual audit of weeds and managing any found on-site or in adjoining areas of the coastal reserve. The period over which the annual audits needs to be clearly outlined to assess the ongoing risks from weeds.	Clarification. Table 2 of the CEMP states that weed monitoring will be conducted by weed contractor and ecologist appointed by head contractor.
17.16	The Supplement should outline the bushfire prevention and management measures that would be implemented at the site. Consideration should be given to the inclusion of asset protection zones, the frequency and timing of controlled burns and the person that would be responsible for undertaking the burns and maintaining asset protection zones.	Clarification. Development would reduce risk of bushfire due to replacement of woodland vegetation and grassy weeds with built form and manicured areas. No further bushfire prevention strategies are considered necessary.
17.17	In the Supplement, provide strategies for ensuring that clearing, preparation of the site and construction of buildings do not generate dust to an extent that the monsoon vine thicket would be negatively affected.	Clarification. Strategies for addressing impacts of dust are provided in Section 5.2.5 and Table 2 of CEMP.
17.18	The Supplement should provide a management strategy which would be implemented for the life of the action to ensure the floristic diversity and integrity of the monsoon vine thicket 'Conservation Area' is retained.	Change. A Conservation and Offset Management Plan will be prepared for the Conservation Area as outlined in Section 7.3.2.1.
17.19	Throughout the draft EIS there are different values for the size of the conservation area and the monsoon vine thicket that would be protected at Muirhead North.	Change. Discrepancies have been addressed.
17.20	In the Supplement outline the size of the monsoon vine thicket patch, the area proposed to be contained in the conservation area and the width of vegetated buffers around the monsoon vine thicket patch.	Change. Refer to Comment 17.12, 17.13 and 17.14.
17.21	In the Supplement, provide a strategy for ensuring that the thinning of the biting insect buffer would not create or exacerbate erosion issues along the north-western edge of the 2CRU.	Clarification. Thinning of native vegetation in biting insect buffer is not considered to be a risk to erosion as understorey vegetation and groundcover will be maintained. Any risk will be addressed through standard measures to be included in the ESCP.
17.22	To demonstrate that there would be adequate erosion and sediment controls in place during each stage of the development, please provide an overarching Erosion and Sediment Control Plans (ESCP) which identifies specific measures that would be used for stabilising soils and managing fine sediments.	Clarification. Overarching ESCP framework included in Section 6 of the CEMP.
17.23	The CEMP has not identified a maintenance schedule and/or monitoring during the development to ensure that erosion and sediment controls are effective and being managed appropriately.	Clarification. This information will be contained within the ESCP.

Comment #	Comment	Response
17.24	Expand on this further to indicate how works would be undertaken and when monitoring and maintenance of erosion and sediment control measures would occur. Monitoring and maintenance should occur throughout the life of the Project and particularly prior to the Wet season to ensure accumulated sediments are not mobilised.	Clarification. Refer to Comment 17.22 and 17.23.
17.25	The development would increase effluent inflows to the LSWTP with subsequent increased discharges into Buffalo Creek. The comments by the Power and Water Corporation confirm that no such upgrades are planned to occur. In the Supplement provide an analysis of the increased quantity of effluent that the development would contribute to the <i>Leanyer Sanderson Wastewater Treatment Plant</i> (LSWTP). Furthermore, provide an analysis of the current assimilative capacity of the receiving environment (Buffalo Creek) and provide an assessment of the risks/potential impacts resulting from the increase to treated effluent being discharged from LSWTP	Change. See Sections 4.2.5, 4.3.1, 6.2.2 and 6.3.1.1 as well as Appendix T and Appendix U.
17.26	Provide information on other methods for managing effluent including re-use and recycling.	Clarification. Following discussions with PWC, neither PWC nor DHA are proposing any re-use or recycle systems.
17.27	Provide details of quantity and quality of runoff from stages 2A and 3, and how contaminants/pollutants in runoff from stages 2A and 3 would be managed prior to the construction of detention basins 2 and 3 constructed during stage 4 of the Project.	Change. Refer to Comment 17.1
17.28	In the Supplement, provide an analysis of the likely impacts to water quality in Buffalo Creek prior to the construction of the drainage reserve proposed in Stage 2B. Consideration should be given to the existing water quality and the assimilative capacity of Buffalo Creek to receive additional urban stormwater water from stages 1A and 1B of the development.	Change. Refer to Comment 17.1
17.29	In the Supplement provide evidence of consultation with the Parks and Wildlife Commission and the outcomes of negotiations relating to migratory shorebirds at Lee Point beach and the mouth of Sandy Creek. Describe the proposed monitoring as well as the funding, timing and ongoing implementation of mitigation and control measures.	Change. See Sections 7.3.2.8 and 8.4.6. Refer to Comment 7.25. Parks and Wildlife Commission will have input into the Conservation and Offset Management Plan for the Conservation Area, and practical measures to minimise impacts to migratory shorebirds. Parks and Wildlife Commission were consulted on 14 March 2018. See correspondence from Parks and Wildlife Commission in Q
17.30	In the Supplement, provide an assessment of the risks of the Project on nesting/hatchling turtles due to sky glow and light pollution. The assessment should include consideration of measures for addressing the risk including the	Change. Refer to Comment 20.5.

Comment #	Comment	Response
	use of lighting to minimise risks to marine turtles (i.e.an appropriate wavelength, shielding and low light fixtures).	
17.31	The Proponent should prepare a Dust Monitoring sub-plan as part of the CEMP. The sub-plan would include provisions for monitoring dust prior to clearing and would continue for the life of the Project. Furthermore, the sub-plan would identify trigger thresholds and clearly outline the mitigation and management measures that would be implemented when necessary to manage dust.	Clarification. Dust is addressed in Section 10 of the CEMP.
17.32	In the Supplement, provide details of the final land use of the heritage site referred to in Jung (2015) and how the Konfrontasi cruciform (KAS-1) site would be retained <i>in situ</i> as a heritage feature.	Change. See changes to Section 7.3.2.12. Local military historians will work with landscape architects to preserve military history within areas of public open space.
17.33	In the Supplement, please outline further heritage studies that will inform the development of interpretation material referred to in Table 46 of the draft EIS.	Clarification. No further studies are proposed as the location of military sites is well understood.
17.34	Comments from the Aboriginal Areas Protection Authority (AAPA) suggest that there may be previously unrecorded sacred sites located on or adjacent to the Project area. In the Supplement, outline the consultations that have been undertaken with relevant NT Government agencies and Larrakia stakeholders and the outcomes of those consultations.	Change. Refer to Comments 2.1-2.7.
17.35	Ensure all actions all within the new draft NT Noise Management Framework guidelines for public comment. The draft guideline is available at: www.ntepa.nt.gov.au/about-ntepa/for-your-comment/comments-open/nt-noise-managementframework-guidelines	Clarification. Noise impacts have been assessed in accordance with the guidelines referenced in the Terms of Reference. As the guidelines are draft only and still at public comment stage (and therefore likely to be revised before finalising), it is considered in appropriate to base the EIS on them at this stage.
17.36	In the Supplement, clarify whether DHA intends to undertake construction activities that may disturb the sleep of sensitive receptors. If so, provide an updated noise management sub-plan which identifies the sensitive receptors and the relevant measures that would be implemented to avoid impacts to sleep. The measures should be consistent with the NT EPA's noise guidelines.	Change. Section 9.2.3.2 and Table 79, as well as Table 7 of CEMP have been updated to ensure that avoidance measures are in place to prevent sleep disturbance to sensitive receptors.
17.37	The noise targets identified in the Construction Environmental Management Plan are inconsistent with the NT EPA's draft noise management framework guideline. To avoid potential impacts on existing and future residents, it is recommended that DHA consider updating the Noise Management Sub-plan consistent with the NT EPA's draft guideline. That guideline is available at: www.ntepa.nt.gov.au/about-ntepa/for-your-comment/comments-open/nt-noise-managementframework-guidelines	Clarification. Refer to Comment 17.35.

Comment #	Comment	Response
17.38	DHA is encouraged to meet with the Operations team at the NT EPA to discuss the known footprint of areas impacted by odour in the northern suburbs of Darwin. In addition to the results of the odour assessment (Appendix J of the draft EIS), a summary of the area known to be impacted by odour should be provided in the Supplement.	Change. See changes to Section 5.2.2 and 5.3.2.
17.39	In the Supplement, provide the location of the relevant sewage pumping stations (Lyons and Muirhead) and demonstrate that the relevant separation distances are in place around those areas where it relates to this Project. The guidelines are available on the NT EPA website at: https://ntepa.nt.gov.au/__data/assets/pdf_file/0006/453192/guideline_recommended_land_separation_distances_oct.pdf .	Clarification. The Lyons and Muirhead sewage pumping stations are existing sewage pumping stations constructed as part of previous residential development to the south. Separation distances to these pump stations from the proposed 2CRU and Muirhead North developments are several hundred metres, well in excess of the recommendations in the NTEPA guidelines.
17.40	In the Supplement please outline what works have been undertaken to identify/remove/remediate contaminants and hazardous materials (asbestos, PCBs, hydrocarbons etc.) from the site. Furthermore, please provide an overview of any site reports, audit statements and plans that have been prepared to ensure that the site is fit for its future intended use.	Change. Findings of site auditors report for 2CRU included in Section 4.3.2.1 'impacts to water quality groundwater during construction activities', and Sections 5.2 and 5.2.5 regarding asbestos. Emu-picking grid walks included as a mitigation measure in Section 5.2.5 and CEMP to identify any residual surface asbestos containing materials as recommended by site auditor. Also see Appendix R and S for site reports.

Table 98. Clara Penton

Comment #	Comment	Response
18.1	General concerns with relating to the impact of Black Footed Tree Rats in the area	Clarification. Impacts and avoidance measures relating to Black-footed Tree-rat are considered in detail in Section 7.2.4.3, 7.4.1.2 and 7.5.
18.2	Cameras used during Black Footed Tree Rats survey were not deployed for the correct amount of time in relation to (Davies et al. 2017). (4 day/night as opposed to 7day/night recommended) Davies, H, McCarthy, M, Firth, R, Woinarski, J, Gillespie, G, Anderson, A, Geyle, H, Nicholson, E & Murphy, B 2017, 'Top-down control of species distributions: feral cats driving the regional extinction of a threatened rodent in northern Australia', <i>Diversity and Distributions</i> , vol. 23, pp. 272-283.	Clarification. The study of Davies et al. 2017 was targeted at a different species to Black-footed Tree-rat. The survey design utilised in this EIS was discussed and agreed with NT DENR prior to commencement and complies with relevant guidelines. See Section 7.2.3.2 for further information
18.3	Significant impact on Black Footed Tree Rats within the proposed sites due to habitat loss in particular loss of mature trees and hollows.	Clarification. Refer to Comment 18.1.
18.4	Current proposed mitigation to have a fauna spotter-catcher only mitigates the direct threat of death or injury as land is cleared.	Clarification. Measures to avoid impacts to fauna include retention of native vegetation and migratory shorebird awareness program.
18.5	There is no proposal to mitigate the loss of hollow-bearing trees from the area which not only will negatively impact BFTR but all other hollow dependant fauna in the area.	Clarification. The loss hollow-bearing trees will be offset by protecting suitable habitat offsite that either contains hollow-bearing trees, or will develop into hollow-bearing trees based on the proposed mitigation measures.
18.6	Funding should be allocated for the translocation and/or monitoring of BFTR that currently reside in the area	Clarification. Funding is allocated to the proposed offset (onsite and off-site). The DENR do not recommend translocation of Black-footed Tree-rat due to stress induced injury or death.

Table 99. Parks and Wildlife Commission

Comment #	Comment	Response
19.1	Rehabilitation work done to control erosion in the gullies in the southwest of 2CRU must be to the satisfaction of the Commission. Included in the Development Agreement between the Northern Territory of Australia and Defence Housing Australia.	Change. ESCP will require approval of Parks and Wildlife Commission and DENR. See Table 52 and Section 7.3.2.4, and Section 6 of the CEMP.
19.2	The proposed Erosion and Sediment Control Plan must be subject to approval from the Land Management Unit, Department of Environment and Natural Resources (DENR).	Change. Refer to Comment 19.1.
19.3	Initial litter mitigation measures prior to Stage 4 are not identified. The proposed Erosion and Sediment Control Plan will need to address this.	Change. DHA will remove any rubbish and engage a site auditor to determine the presence of contaminants and threat to humans. See Sections 5.2.5 and 7.3.2.1. and CEMP.
19.4	Any existing rubbish and debris from previous defence operations within the proposed Conservation Area must be removed before transfer of responsibility for the land to the Commission.	Change. Refer to Comment 19.3.
19.5	The 2CRU area need to be closely examined for further asbestos contamination. Asbestos containing material may have been washed down from the site into the Conservation Area below.	Clarification and Change. A site audit report has been completed for 2CRU. Refer to Comment 17.40 regarding additional measures in place to address asbestos risks.
19.6	The EIS does not contain details about the mountain bike track and access to the beach as contained in the initial agreement	Clarification and Change. Refer to Comment 11.2 regarding mountain bike track. Section 7.3.2.7 discusses general location of access track. Detailed design of access track will be completed prior to Development Approval. See additional text in Section 7.3.2.7 regarding to how location of access track will utilise existing degraded areas to minimise removal of native vegetation.
19.7	There is a lack of information regarding the infrastructure required to restrict access to the conservation area post construction. In particular the fence between the proposed Conservation Area and the ‘Escarpment Park’ (top edge of the escarpment).	Change. Information on fence provided in Section 7.3.2.7.
19.8	There is a lack of detail regarding the revegetation of native flora in part to provide habitat for the Black-footed Tree-rat and rehabilitation plans of areas that have been damaged by erosion	Clarification and Change. Revegetation in erosion gullies discussed in ESCP section of CEMP.
19.9	The proponent will be responsible for ongoing weed management within the Conservation Area until the area is transferred to the NT Government in accordance with the Agreement.	Change. Section 7.3.2.1 updated to make it clear DHA will be responsible for management until a hand-over time is agreed with Parks and Wildlife Commission.

Comment #	Comment	Response
19.10	There is a lack of details regarding the proposed barrier fence 100 metres on the western and eastern side of Sandy Creek described in section 7.3.2.7 is within the Casuarina Coastal Reserve (CCR). The same comment applies to the proposed signage described in sections 7.3.2.8 and 7.3.2.9	Clarification and Change. Detailed plans regarding the location of barrier fencing will be prepared prior to the Development Authority approval. Parks and Wildlife Commission were consulted on 14 March 2018 regarding this matter. It was agreed that the fence and signage would be implemented under the guidance of Parks and Wildlife Commission who have experience with these matters. See changes to Sections 7.3.2.7 and 7.3.2.8.
19.11	The Commission have not been consulted on the management action 'Improved awareness of values of conservation area as part of broader signage programs for migratory shorebirds and threatened sawfish.' (pg. 159)	Change. Refer to Comment 19.10.
19.12	The change of zone of the Conservation Area is a very slight indirect mechanism that adds to protection for threatened species. There is no management change that will benefit the BFTR	Clarification. Refer to Comment 20.3.
19.13	The impact of the proposed mountain bike trail and walkway through the Conservation Area is not mentioned.	Clarification and Change. Refer to Comment 19.6.
19.14	Details surrounding the funding of the Conservation Area is questioned. The Commission expect that DHA would be financially responsible for the offset beyond this time.	Clarification. DHA will be financially responsible for management of Conservation Area until hand-over to Parks and Wildlife Commission, in accordance with the agreement with NT Government.
19.15	Details in the CEMP need to be included regarding the construction of the mountain bike track, access way to the beach and fence line along the escarpment. Also regarding asbestos the CEMP need to contain mitigation measures in wash down areas and the process if asbestos is discovered during construction.	Clarification and Change. Asbestos mitigation measures discussed in Section 10 of CEMP but refer to Comments 19.3 and 19.4 for changes to asbestos mitigations. Details regarding the construction of the mountain bike track, access way and escarpment fence will be addressed after detailed design.
19.16	Who will fund the mosquito breeding rectification program in Casuarina Coastal Reserve and the Buffalo Creek Management Area	Clarification. DHA will fund the rectification program in the Casuarina Coastal Reserve (i.e. remediation of erosion gullies) and Buffalo Creek Management Area (i.e. infill of existing breeding sites).
19.17	There is a lack of consultation with the commission regarding use of the Conservation Area as an offset area for BFTR, installation of fencing and signage within the Casuarinas Coastal Reserve, educational programs to be conducted by the Commission, potential increase in the number of patrols by the Commission and the mosquito breeding rectification program to be initiated in Casuarina Coastal Reserve and the Buffalo Creek Management Area	Change. Refer to Comments 17.29, 19.11 and 19.16.

Table 100. Department of Environment and Natural Resources (consolidated comments)

Comment #	Comment	Response
20.1	Proposed works will fragment BFTR habitat and reduce habitat connectivity. Development will permanently alter one of the last landscape-scale continuous linkages of woodland within the northern suburbs of Darwin. In addition, the staged removal of habitat to allow fauna an opportunity to relocate will be of little benefit if there is not sufficient habitat in which to relocate.	Clarification. Impacts to Black-footed Tree-rat habitat is addressed in detail in Sections 7.2.4.3, 7.4.1.2 and 7.5. Staged removal of habitat is generally considered best practice. Casuarina Coastal Reserve and woodland along Buffalo Creek provide suitable sink locations for Black-footed Tree-rat. Ecologists will be on site to salvage any species that do not move to these areas at their own accord.
20.2	Details lacking in EIS regarding BFTR impacts this includes no evidence that the habitat near the hospital is of better quality than that of the project site, nor is there sufficient evidence presented to demonstrate that there is adequate habitat in areas adjoining the project site to sustain breeding, or movement of animals from inside the project footprint.	Clarification and Change. The results of Griffith et al. (2002) and Rankmore et al. (2001) support better quality BFTR habitat than in the impacted area of 2CRU based on number of records. See Section 7.2.4.3. Reference to results of Rankmore (2006) added to Table 48 regarding home range of Black-footed Tree-rat.
20.3	Offset mapping of BFTR is based on certain parameters which could also take into account that BFTR is a highly mobile species with relatively large home range and may partly rely on lower quality habitat. The reservation of the monsoon vine thicket area is a mitigation action and should not be considered an offset. Rehabilitating illegal access points to the beach are also not suitable offsets for Black-footed Tree-rats, as they are unlikely to provide direct benefits to the species.	Clarification. The offset mapping does take into consideration the mobile nature of the species. For instance, dirt roads, Gamba grass infested areas are mapped as habitat albeit at a low rating. The reservation of the Monsoon Vine-thicket was undertaken during the rezoning process which was proposed by DHA as part of the development of the study area and can be considered as part of the same action under the EPBC Act. Under the EPBC Act, the protection of an offset site prior to clearing is considered more advantageous to the species and can be assigned additional points using the EPBC Act calculator. However, no additional points for early offsetting were included in the offset calculation in the EIS. While we acknowledge the benefit from revegetating tracks is low, this should not be considered a reason not to proceed with the works and there are plenty of successful revegetation projects implemented in the greater Darwin area. .
20.4	Further details is needed in regard to impact reduction strategies for migratory shorebirds. This includes; community awareness and engagement program, implementation and maintenance of the rehabilitation of informal tracks between the project site and the beach, the installation of barrier fencing on the western and eastern side of Sandy Creek and installation of signage, the security offences and gates that lead to unauthorised vehicle entry to beach is included in Appendix N as a mitigation action, but this was not adopted in the EIS. The objectives, design and implementation of the proposed shorebird monitoring.	Clarification. Impact reduction strategies are discussed in Sections 7.3.2.77.3.2.8, and Table 2 of the CEMP and Appendix N. The objectives, design and implementation of the shorebird monitoring is articulated in the CEMP (see performance indicators, monitoring and management actions).

Comment #	Comment	Response
20.5	FLighting impacts to turtles have not been addressed in the EIS	Change. Mitigation and CEMP updated to include mitigating light impacts to turtle. Flatback Turtle and Olive Ridley only species recorded on beach. Olive Ridley considered vagrant. Lighting from house, buildings at least 400 m from nesting sites. Main risk is from multistorey buildings in main streets. Refer to Environmental Assessment Guidelines for Protecting Marine Turtles from Light Impacts (WA EPA 2010). See Section 7.3.2.11 and changes to CEMP.
20.6	Ongoing management of the smaller area (1.57 ha) of monsoon rainforest in Muirhead North has not been described. No further mitigation to reduce negative impacts on the rainforest is proposed if a trigger point is reached.	Clarification and Change. No management of Monsoon Rainforest in Muirhead North considered necessary provided hydrology is maintained. Refer to Comment 17.11 regarding values that will be used to trigger a management response.
20.7	No weed management plan was included in the draft EIS. Additionally, the draft EIS uses the past/defunct genus and species for the perennial mission grass (Pennisetum polystachion) instead of the current genus and species Cenchrus polystachios.	Clarification and Change. Weed management is covered in Table 2 of the CEMP. Mission grass botanical name updated.

Table 101. Department of Health

21.1	Biting insect issues have been left out of the risk assessment and needs to be included. Infrastructure mitigation measures in Sandy Creek, Muirhead discharge drain are to include biting insect management features. The possibility of nearby mosquito breeding in CCR, Lee Point and Buffalo Creek affecting residents needs to be addressed.	Change. Refer to Comment 14.5.
21.2	The 2CRU open wind buffer should be at least 50 m wide, to minimise pest problems from a short dispersing jungle mosquito (<i>Verrallina funerea</i>)	Clarification. Mentioned that buffer is 50 m in Table 47, and Sections 7.2.4.3 and 7.3.2.1.
21.3	Infrastructure designed to be low maintenance, and that all discharge drains and associated access easements have been excised from conservation zoned land and appropriately zoned to allow easy future maintenance. Furthermore bioretention basins, lakes and other stormwater treatment devices design should allow effective maintenance by the relevant authority and be completely free draining within a few hours or within 3-4 days after the rain event. Lakes would need to be stocked with small native fish and have appropriate edge design to minimise the potential for dense semi-aquatic vegetation growth and subsequent mosquito breeding	Change. See last paragraph in Section 4.3.2.2 regarding stormwater treatment train.
21.4	The proposed 2CRU development occurs within 300 m of a helicopter mosquito spray zone in CCR, which may contradict civil aviation regulations.	Clarification. It will be up to the NT Government the height of buildings in the commercial zone of 2CRU. Any contraventions of civil aviation regulations will be considered by the Government when they take ownership of their sites.
21.5	There should be no dry season low flows directed into the monsoon patch. This is an attempt to stop the patch becoming a weed infested mosquito breeding swamp. Medical Entomology is not a handover authority for stormwater drainage.	Clarification. The stormwater drainage system has been designed to mimic the natural hydrology so there should be no change in breeding habitat conditions within Monsoon Rainforest Patch. Furthermore, the Government requires that the Monsoon Rainforest patch be retained and thus some stormwater will need to be redirected to patch.

Table 102. Department of Trade, Business and Innovation

Comment #	Comment	Response
22.1	No comment.	Not applicable.

Table 103. Department of the Attorney General and Justice

Comment #	Comment	Response
23.1	No comment.	Not applicable.

Table 104. Department of Tourism and Culture (Heritage Branch).

Comment #	Comment	Response
24.1	Draft EIS document contains a number of references to NRET (NT Natural Resources, Environment and the Arts) The department no longer operates under this name, any references to NRET or NRETA in relation to Heritage issues should be amended to now read Department of Tourism and Culture (DTC).	Change. Department name updated.

Table 105. Aboriginal Area Protection Authority

Comment #	Comment	Response
25.1	No previous certificate over the area and therefore there could be risk to the development associated with previously unrecorded sacred sites. The proponent will obtain an Authority Certificate from the AAPA prior to commencement of works. AAPA have reviewed the project and it is highly recommend the proponent seek an Authority Certificate.	Change. Refer to Comment 12.2.

Table 106. Department of Tourism and Culture.

Comment #	Comment	Response
26.1	Discrepancies between residential population, noted as between 2700 and 3100 persons on page 173 and values (2516) stated in the adopted master plan page 60.	Clarification. Correct figure is those stage in EIS.
26.2	Encourage the proposed bus service along Coastal Esplanade to continue up to Lee Point.	Clarification. The bus route has been developed based on requests of NT Transport Department, consultation with the public and NT Government regulations.
26.3	The maps do not confirm where the pedestrian and cycle path/s that have been referenced on page 67 are to be located.	Clarification. Refer to Comment 14.2.
26.4	Suggested that “safe pedestrian infrastructure” include shaded walkways/paths and water fountains around high use areas such as the proposed Tourist Precinct.	Clarification. Refer to Comment 14.2.
26.5	Tourism question why local Larrakia Rangers have not been suggested as the group like to carry out the black footed tree rat surveying.	Change. Refer to Comment 2.1.