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**From:** noreply@ntepa.nt.gov.au  
**Sent:** Tuesday, 2 November 2021 3:29 PM  
**To:** eia NTEPA  
**Subject:** NTEPA Consultation - North One Hotel and Apartments  
**Attachments:** 20211102-Little-Mindil-NT-EPA-submission.pdf

Consultation title: North One Hotel and Apartments  
Closed date: 2021-11-02T23:59:00

**Your details**

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Telephone:  
Address:

Are you making this submission on behalf of an organisation?: Yes  
Organisation name: Larrakia Development Corporation

**Submission contents**

Enter your submission below. Maximum of 500 words: Refer attached communication.

**Submission files**

Attachment 1: 20211102-Little-Mindil-NT-EPA-submission.pdf, type application/pdf, 182.4 KB  
Attachment 2: No file uploaded  
Attachment 3: No file uploaded  
Attachment 4: No file uploaded  
Attachment 5: No file uploaded

**Acknowledgement**

Before submitting this form please check one of the boxes below to indicate that you agree with one of the following statements: I agree for my submission to be published



**Working for ALL LARRAKIA**

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Tuesday, 2 November 2021

**North One Hotel Development and Apartments NTEPA Referral Report  
Larrakia Development Corporation Submission**

To whom it may concern,

The Larrakia Development Corporation (LDC) provides the below submission highlighting concerns relating to NT EPA referral by KTT Investments Pty Ltd for North One Hotel and Apartments proposed at Little Mindil Beach.

LDC believe the proposed development at Little Mindil Beach will have significant cultural and heritage impacts and the mitigation measures outlined are insufficient to manage these impacts.

The proposed works will include a significant amount of excavation for construction of the lagoon pools, below ground parking and installation of below ground services.

Given the known significance of the Mindil Beach area as a Larrakia burial ground and history of disturbance of the area through earlier developments, it is essential that full and exhaustive investigation is undertaken of the area prior to any consideration of approval for works to be undertaken. It is not acceptable to make the more detailed assessment a condition on the works before commencement. Once approvals are given and project works are underway the possibility of a full respectful process being undertaken is circumvented. The suggestion of an archaeological monitoring programme and Larrakia representative being on site for ground disturbance works is insufficient. The proposal as it currently stands will repeat the past, disturbing and disrespecting another of the very few remaining sites of significance to Larrakia.

The November 2020 Archaeological Assessment Report by Ellengowan Enterprises is listed as one of the technical studies used to inform assessment of cultural and heritage impacts.

LDC believe the scope of work undertaken in the archaeological report is significantly inadequate for the scale of development proposed and particularly considering the known cultural significance of the site. As stated in the document title the report is a *Small-Scale Archaeological Assessment*. The introduction to the report notes the survey was limited to surface finds only and undertaken as a one-day survey.

The report states, *"A complete history of Little Mindil Beach is beyond the scope of this survey, but suffice to state that the area had been and still is significant to the local Larrakia People of Darwin."* It is clear that the report's author is also of the belief the scope of the report is inadequate for the site and know history.

The works will necessitate significant disturbance of the site, adjacent to the listed sacred site and across an area known to be a Larrakia burial ground. As such a full and adequate investigation would need to be completed prior to contemplating a project design and feasibility on this site. Work that would also require an authority certificate from the Aboriginal Area Protection Authority.

The stakeholder engagement report, provided as an appendix, notes seeking an AAPA certificate for the works as a solution to the issues raised during stakeholder engagement meetings around the significance of Aboriginal sites. The timing for the AAPA certificate is listed to be after the Development Consent has been received. LDC does not support that this is a sufficient process to adequately address the above concerns, especially post issue of a Development Permit. It is my understanding that an AAPA certificate has not been issued in any event. This is a significant and fatal omission in this application process.

The 'mitigation' measures contained in page 143 of the report, referencing the LDC are not the subject of any formal discussions, nor agreement. They should be ignored in their entirety.

LDC do not believe sufficient investigation into the historical and archaeological significance of the Little Mindil site has been undertaken to support the conclusion that the North One Development is compliant with NT EPA Objectives. The risk of further desecration of Larrakia burial grounds is significant. As such this proposal should not be endorsed.

Regards,

A handwritten signature in black ink, appearing to read 'Nigel Browne', is positioned above the typed name.

Nigel Browne

CEO  
Larrakia Development Corporation