

Submission on the Supplement to the draft EIS

TNG Limited – Darwin Processing Facility

This submission is made under clause 9 of the Environmental Assessment Administrative Procedures 1984 and section 296 of the *Environment Protection Act 2019*

Government authority: Department of Infrastructure Planning and Logistics (DIPL)– Lands and Planning Division

Summary: The Darwin Regional Land Use Plan identifies Section 1817 for the development of Strategic Industry. DIPL is planning for the development of Middle Arm as a Sustainable Development Precinct to support the construction and operation of large gas-based manufacturing industries.

Section of Supplement	Theme or issue	Comment
Supplementary Main report - Section 2.3.9.1	Water Supply	Additional information is requested on the volume of water that is initially required to be sourced from the Darwin Water Supply prior to recycling processes and stormwater harvesting coming online.
Supplementary Main report - Section 2.3.9.1	Workforce Accommodation	Further information is required on alternative workforce accommodation options as the use of Section 1864 (Bladin Village) for a use that constitutes a sensitive receptor is not appropriate as it would limit the development of other sites located closer to Bladin Village on Middle Arm to support the construction and operation of large gas-based manufacturing. The former INPEX workers village at Howard Springs is owned by the NT Government and being used for mandatory supervised quarantine for repatriated Australians.
Supplementary Main report - Section 2.2.7	Traffic	Further information is required on traffic impacts of other workforce accommodation options, including increased employment of local residents as the traffic generation numbers are based on workers being accommodated at Section 1864.
Supplementary Main Report - Section 2.6.2 and Section 3.5.3.3 Community	Atmospheric Emissions	The proposed 100m high stack may require approval from Department of Defence under Part 11A Defence Regulation 2016. Under the <i>Planning Act 1999</i> , it would be prudent to address the visual amenity impact on nearby properties, as well as views across the harbour, for the proposal for a 100m high stack and approximately 37 stacks or exhaust pipes, ranging from 9m to 40m in height.
Supplementary Main Report - Section 2.6.5	Noise	In relation to the future Weddell Urban Area, the Supplement's statement of "this development is no longer proposed to occur" requires review. While it is not currently anticipated that the development of Weddell will occur during the timeframe proposed for project construction, Weddell remains a part of the NT Government's long term strategic plans for development.

Environmental impact assessment under the Environment Protection Act 2019

<p>Section 3.3 Section 3.5.3.1</p>	<p>Air Quality Community and Economy - Sensitive Receptors</p>	<p>Weddell should not be excluded as a sensitive receptor for the purpose of air quality assessment as it is anticipated that Weddell will accommodate residents within the expected life of the plant.</p> <p>The future suburb of Mitchell is identified in the Darwin Regional Land Use Plan and Palmerston Eastern Suburbs Area Plan for potential future urban/peri-urban development and is located approximately 2.7km from the development but has not been identified as a sensitive receptor.</p> <p>All potential sensitive receptors should be addressed for the life of the project's operation.</p>
<p>Supplementary Main Report - Section 3.1.4</p>	<p>Inland Water Environmental Quality</p>	<p>DIPL concurs that development of industrial uses should be avoided in the Primary Storm Surge Area as identified by the NT Planning Scheme 2020.</p>
<p>Supplementation Main report - Section 3.3</p>	<p>Air Quality</p>	<p>Additional information is requested from TNG on its proportional contribution to the Darwin air shed of pollutants of concern. DIPL is developing an air shed model for the Middle Arm Precinct as part of its planning for the development of Middle Arm as a Sustainable Development Precinct for large gas-based manufacturing industries.</p>
<p>Supplementary Main report- Section 3.4.5</p>	<p>Mitigation and Management of GHG Emissions</p>	<p>DIPL is planning for the development of Middle Arm as a Sustainable Development Precinct and will be preparing a whole of Middle Arm Green House Gas (GHG) emissions strategy. TNG's GHG management plan should commit to participating in the whole of Middle Arm GHG emissions strategy, including how it will contribute to the Northern Territory Government's policy of net zero emissions by 2050.</p>
<p>Appendix B - Rehabilitation Plan</p>	<p>Figure 3.1 - Rehabilitation Areas</p>	<p>Areas identified to be rehabilitated on Figure 3.1 are identified in the Darwin Regional Land Use Plan for the development of Strategic Industry. Utilisation of this land for rehabilitation purposes is not considered an appropriate development and use of the land.</p>
<p>Appendix D - TIA - Section 4.4.2</p>	<p>Level Crossing Delays</p>	<p>The forecast delays at the Channel Island Road and Jenkins Road level crossing are not acceptable from an emergency management or operational perspective for existing or future tenants of the Middle Arm Sustainable Development Precinct.</p>
	<p>Approvals and Regulatory Framework</p>	<p>In accordance with current land use policy set out under both the Darwin Regional Land Use Plan and the Litchfield Subregional Land Use Plan, the subject site is identified as appropriate for Strategic Industry. The proposed use is therefore considered to be consistent with the types of land uses envisaged in the locality. The broader locality is in use for, or identified for, industrial and other non-residential uses, and the proposal is therefore consistent with land use policy and existing land use in the locality.</p> <p>However, Section 1817 is currently within Zone FD (Future Development) of the NT Planning Scheme. The proposal may constitute either a light industry or general industry use, which are prohibited uses in Zone FD. Section 1817 should be rezoned to Zone DV (Development) to reflect the intended use. The rezoning process is subject to approval from the Minister for Infrastructure, Planning and Logistics.</p> <p>Relevant land uses in Zone DV (Development) require development consent. The subject site is within the Litchfield Division of the Development Consent Authority.</p>