
From:
Sent: Tuesday, 2 November 2021 11:40 PM
To: eia NTEPA
Subject: Public Submission during the Environmental Impact Assessment - North One Hotel and Apartments (Lot 07651)

2.11.2021

NTEPA

Dear Sir/ Madam,

This is a Public Submission prepared during the Environment Impact Assessment of North One Hotel and Apartments (Lot 07651 (Referral documentation).

It is based largely on the information in the document 'Environmental Impact Assessment Guidance for Stakeholders', from major experience during the development application period, together with the list of Appendices shown on the website.

Personal Details of Submitter

Declaration about Publication

I agree for my submission to be published but with my personal identification not used with it.

This submission is a personal one, and not on behalf of any organisation.

SUBMISSION

EP2021/010 - North One Hotel and Appartments on Lot 07651, Town of Darwin.

1. This submission, to the NTEPA, concerns many aspects of the environmental impact of the proposed development on Lot 07651, Town of Darwin, and environs.

In making this submission I am mindful of the fact that the definition of the environment in the EP Act is a very broad one, and includes, physical, biological, economic, cultural and social aspects.

The development is proposed by DTT Investments Pty Ltd, having major foreign connections in Vietnam, with architects interstate. This is massive oriental style of built commercial development. It consists of various large, multi-storey apartment buildings, a hotel and supporting developments, jammed into the lot, with little space to spare, very inadequate parking and lacking ready vehicle access.

As a general statement, I have found some, at least, of the proponent's documents, including even some special reports, written and physical, insensitive and unreliable, much lacking in correct environmental references and analysis, both about the present site, or the future impact.

They can often seem unnecessary verbose and superficial, and can be misleadingly confident of outcomes that may never occur.

Community Consultation Seriously lacking

2. The proponents of this massive application have been active with the proposal for many months, including with the NT Government, without the public being aware of it. They refused to consult with the community on their application prior to the advertised application, except for residents of two buildings.

There was even a legal threat if a member of the public attended a consultation uninvited.

The public has found the massive documentation overwhelming in bulk, often confusing, and impossible for many to read or understand.

3. There is no doubt that the essential use of Section 42 of the new EP Act has failed. The public are not being recognised as stakeholders. This situation cannot be swept over, and forgotten. It must be rectified before any development goes on.

I include here the essential reference to truly appropriate truthful consultation with Aboriginal people at an individual-in-community level, and not merely at a senior organisation level. I cannot recall if the proponents have applied for appropriate authority from the Aboriginal Areas Protection Authority for any of their work.

The real Darwin Foreshore, and what Goyder Saw and Did.

4. This special land, known as Little Mindil, is part of Greater Darwin's foreshore, as defined by the Macquarie Dictionary which is the legal authority in Australia. It states that the **FORESHORE** is between the sea or water, and the first next roadway, and should never be built on. Darwin's Coastline uses this pattern, as promoted by Chief Minister Marshall Perron so wisely.

5. Environmentally Little Mindil is part of an important geographic feature in natural Darwin, as pointed out by a previous Planning Minister, Tim Baldwin. The Mindil Beach Area is a green amphitheatre edged round by the Green Escarpment. It forms a semi-circle from the mouth of Mindil Creek and runs behind the Botanic Gardens over to Bullocky Point. This beautiful natural feature would be destroyed by building.

6. Surveyor George Goyder after setting out the Darwin (Palmerston) Town Plan, looked beyond, and made the Mindil Beach Area a place for recreation - calling it Parklands. We should keep it that way. Because of COVID-19 people are appreciating having access to parks for walking much more.

Some Little Mindil Heritage and History

7. Historically Little Mindil has many stories to tell from both Aboriginal and European people who have known this place, old and young. It is said to be a place where different Aboriginal groups met formally with those from the Tiwi Islands. During World War II, there was need of emergency burials from the bombing of ships in the harbour. Later the beaches became a great recreation space for nurses and soldiers. And there is the aeroplane story too. It has been frequented by Aboriginals, and Europeans as a place to Live, Work and/or Play by many. It has been a place to source of food, especially in good seasons. To some it was a place of survival. It has been a caravan park when housing was short, with some people living on boats. From time to time, I am told that most of Lot 07561(under a different lot number) has been gradually consolidated to its present level by numerous periods of dumping.

Little Mindil Now

8. Little Mindil is now a grassed public open space for recreation, with the creek mouth to this sea. This layout with a parking area open to the public was established by one of the Covenants, by Mr Peter McQuean sitting as Chairman of the Development Consent Authority(DCA) in a formal decision on a Sky City Development application. Other Covenants cover the Green Escarpment, and the Creek. All the Covenants should still stand as when the Chairman established them, for the DCA decision on the Sky City development application.

Our Little Mindil

9. It is an enchanting place where the creek weaves itself around at the mouth. It finds its way eventually to the sea in a great boomeranging curve, whilst the tide goes in and out in its little corner of the world.

It is a lovely place at sunset. In the clean fresh air. It is a relaxing place to walk quietly down through the Nurses Walk, across, to the Casino, or around and back, across the green grass.

Many are angered by references on the proponents' illustrated maps which show clearly (and without shame) that if their development application was to be approved, our present public pathways would be redirected, and the development totally privatised and reserved for their paying clients. That would be intolerable.

The fact is that Little Mindil (Lot 07651, plus free easy access to the sea), is very dear to the hearts of thousands of Territorians, and it should by rights be returned to them now as a normal proper part of the rest of the real Darwin Foreshore.

10. Submission Points - Other Concerns that can be Mentioned only, due to lack of time.

I have spent many hours studying and investigating the proponents' documentation. Unfortunately, I am not in a position to comment in detail on each of my concerns in as great a detail as above, however in listing them, it may help to paint the bigger picture of people's concerns about the environmental issues. Many of these concerns I know are shared by others.

Further Submission Points for mention only:

11. STORM SURGE- Developments with a residential component should not be built in Surge Zones.

The proponent does not appear to be taking cyclones and storm surge seriously.

12. STOREY LEVELS - Because of the factor of building on filled land, true heights have been impossible to establish reliably.
13. HEIGHT REQUIRED ABOVE STORM SURGE - Local opinion is very strong in that not sufficient height is being used.
14. WATERFRONT BUILDING IS TOO CLOSE TO THE SEA - Local opinion is that the building would be damaged by storms.
15. USE OF GREEN ON ROOFS - Though being promoted, may not be sustainable in monsoon climate with a Dry Season.
16. HUGE AMOUNTS OF WATER IN DESIGN - May not be viable
17. DIFFERING SCALES AND VERY SMALL PRINT ON PLANS - Impossible to read or check details.
18. LACK OF PLANS SUITABLE FOR CONSTRUCTION USE BY THE DCA - How can these be thoroughly used by the DCA.
19. WIND DIRECTION AND WIND SPEED QUERIES - Disagreements with local knowledge.
20. IMPACT ON MYILLY POINT HERITAGE TRIANGLE - Inadequate and incomplete investigation
21. WHO IS RESPONSIBLE FOR THE MAINTENANCE OF THE ESCARPMENT- Has this been abandoned- who cares ?
22. BUILDING ON TOP OF THE FILL - Could there be bodies underneath
23. CERTIFICATION FOR BUILDING - Are there more than one 'Sacred Site'
24. HOW WILL CARS AND LORRIES ACCESS THE HOTEL AND APARTMENTS - Is an entrance possible. What land will be used if so.
25. PLANS FOR UNDERGROUNDING POWER LINES - What cost and who pays. is it safe ?
26. SAFETY ON GROUND LEVEL AROUND ELECTRICITY STATION - Whose responsibility
27. CULTURE CONSIDERATIONS - Will the development be family and culturally friendly to Darwin people
28. HOW WILL THE COMPLEX BE MANAGED - Will there be returns to the NT from it ? Will major decisions be made in Vietnam ?

29. WHAT IS THE SITUATION WITH THE FIRB ? We need to have access to their decision making

30. IS THE SALE OF LOT 07651 FROM SKY CITY, CONDITIONAL ON APPROVAL OF THE DEVELOPMENT ? - Could there be there better outcomes for the people of Darwin ?

31. THE PUBLIC IS AWARE OF THE SECRET REZONING NEAR THE BEACH, AND THE SECRET REMOVAL OF THE COVENANT COVERING THE PUBLIC USE OF LOT 07651 - How is that situation to be corrected for fair play ?

32. HOW MUCH IS THE REAL COST OF ALL THE EXTRA COSTS OF USING THIS LAND FOR THIS DEVELOPMENT, INCLUDING A MOST DANGEROUS ACCESS ROAD ?- Would the public pay this ?

Conclusion

33. From from the evidence shown, it is my position to most strongly recommend a refusal to accept the proponent (DTT Investments Pty Ltd) environmental assessment documentation.

Please acknowledge my submission as soon as possible.

Regards,

