



## **RAPID CREEK LANDCARE GROUP INC.**

**OCTOBER 2017**

**SUBMISSION TO:**

### **APPLICATION FOR DEVELOPMENT CONSENT SECTION 5936 ABALA ROAD, HUNDRED OF BAGOT, MARRARA NETBALL STADIUM AND SUPPORT FACILITIES**

The Rapid Creek Landcare Group is opposed to any development that destroys the ever diminishing native vegetation in the catchment. The vegetation in the area proposed for development provides important wildlife habitat and also forms a buffer to the sensitive riparian vegetation along Rapid Creek. The development will destroy this native vegetation. The Rapid Creek Landcare Group thinks it would be prudent for the new netball facility be built on already cleared land. For this reason, and due to the serious concerns raised below, the group considers that this application should not be approved.

The application does not mention the City of Darwin land (Sections 5249 and 4295) immediately adjacent to Section 5936 that is proposed for Conservation zoning. The development needs to demonstrate that there will be no negative impacts to this land.

It is obvious that an extensive amount of land filling would be required to build the facility in the proposed location; have the NT Government personnel involved in the Rapid Creek flood mitigation work been consulted? The landfill required would likely impact into the flood zone. There are no cross-section diagrams or contour diagrams that show what filling will occur; these need to be provided to show the extent of land fill. A comprehensive study needs to been undertaken to ensure that the project will not alter the hydrology of Rapid Creek in a way that will negatively change floodwater behaviour.

There needs to be an analysis of PFAS (per- and poly-fluoroalkyl substances) issues which have postponed the proposed adjacent Marrara Detention Basin works, and, as we understand, were considered for the nearby Marrara Tennis Centre currently under construction.

There is inadequate information on how soil erosion and sediment control will be managed. A much more detailed Erosion and Sediment Control Plan needs to be provided that complies with *Best Practice Soil Erosion and Sediment Control* by the International Erosion Control Association and the Northern Territory's *Soil Conservation and Land Utilisation Act 2016*. Due to the proximity to Rapid Creek, any work needs to be completed and stable before the end of the dry season, no work should occur during the wet season.

Information needs to be provided on how vehicle and equipment access and use will be managed to ensure there are no off-site negative impacts. There needs to be an absolute guarantee that access will not occur off Henry Wrigley Drive. The Rapid Creek Landcare Group has put considerable effort into working with landholders to prevent inappropriate vehicle access to Rapid Creek in this area. The development needs to guarantee that site works will not enable inappropriate vehicle access into the Rapid Creek riparian area by the public, and specifically that no construction vehicles enter Sections 5249 and 4295.

The application only refers to the beneficial uses for the Darwin Harbour Region; the Beneficial Uses and Objectives for the Freshwater Reaches of Rapid Creek (declared January 2000) are not mentioned. Information is needed on how ongoing water run-off and pollution from the site will be managed to ensure the Beneficial Uses of 'aquatic ecosystem protection and recreation and aesthetics' as declared for the Freshwater Reaches of Rapid Creek are to be achieved into the future.

Owners and occupiers of land in the Northern Territory are required to manage weeds under relevant legislation. Section 5936 includes: weeds that are declared under the Northern Territory *Weeds Management Act 2001*; species declared as Key Threatening Processes to Australia's biodiversity under the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999*; and species declared as Weeds of National Significance. Weed management is not mentioned in the application. A weed management plan is needed for the site for the construction phase and for the long term future. All declared weed species need to be appropriately removed before any activity commences.

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