

**COMMENTS ON THE 'GREATER DARWIN PLAN' AND THE 'GREATER DARWIN LAND USE PLAN, TOWARDS, 2030. CONSULTATION PAPER', BY PLAN: THE PLANNING ACTION NETWORK, INC.**

**12 April, 2012.**

**Introduction**

**1. PAn is an independent non government community organization devoted to balance in planning. It is concerned with the social, cultural, environmental, and long term economic impact of development on the living environment in the Northern Territory. It works for better living environments.**

**2. Our focus at this time is on commenting on the 'Greater Darwin Plan'(GDP). However, our comments often encompass both plans. We are surprised that the Chief Minister would question the need for an opportunity for the community to do so at this stage.**

**3. The Greater Darwin Land Use Plan (GDLUP) introduced population projections, and wider parameters and policies, including some like COAG originated, from outside the NT, and proposed strategies for expansion of the built environment.**

**4. GDP contains both new material, including projections for the very rapid introduction of various particular mining and heavy industrial projects and processes into the NT, and particularly the Greater Darwin area.**

**5. The GDP is also new when it introduces specific interpretations of the impact of the proposed new planning strategies, particularly through an actual set of proposed 'Area Plans'. These have not been tested individually through the normal public exhibition processes which**

would address local knowledge in each area. They contain some significant material with on the ground implications completely new to the community.

6. There are some obvious anomalies. These may be difficult to pick up, because of the small scale maps, and the use of colours inconsistent with present zoning codes which is confusing.

7. We do not believe, except perhaps in parts of the rural area, that the public has known to scrutinising these Area Plans sufficiently in this general scope forward plan, for them to be binding. The public cannot be expected to accept these new area plans without focussed local area consultation.

8. There is no indication of how community consultation arising from the GDLUP eg. rural activity centres densification, has informed the GDP.

9. Consultation must be such that it draws attention specifically to these proposed changes, including where they are not obviously derivative of the proposed use of new strategies. We doubt that this type of consultation has been done.

#### **Population Projections (GDP Section 5 p 27)**

10. The population projection which forms the basis of the application of the residential strategies in the document is that there will be a growth in the population of Greater Darwin from 2010 to 2025 from 127,254 to 188,951 or uses a working number of 62,000 to be newly accommodated. We do not believe that this will happen.

**11. We do not agree that it is wise to plan for such a high growth rate. If achieved, the rapid rate of growth would cause social problems.**

**12. Indications are that in recent years there has been a turnover of the population through new arrivals and loss rather than a rapid growth rate. This is shown for 2011 in the chart on page 24.**

**13. The NTG is energised by the final signing of an agreement with Inpex. However the rapid sequence of industrial and mining major projects to be established in the NT in the years 2012-2020, shown on the timeframe on page 25, is unlikely to happen. We have already seen how two LNG plants have been unfortunately located within Darwin Harbour through lack of independent long term planning of siting.**

**14. The GDP Plan has as its basis the industrialisation of Greater Darwin. That in itself will cause many of the present population to leave. Whilst some business interests may welcome the industrial development of our tropical paradise, with the best lifestyle in Australia' (p18), many of the longer term community will remark 'Who asked us?', and go elsewhere to live, taking their growing families with them.**

### **Residential Growth Strategies (Section 7)**

**In the summary paragraph on page 42, a potential 23,500 homes would be needed for the additional 62,000 people.**

**16. The Plan identifies two major options for housing the increased population- Greenfields development and Infill. These are not always clearly and consistently defined. However, it is stated on page 42, 50,000 dwellings could be achieved from 'greenfields' and 40,000 from infill**

**development. The infill figures are untenable, and if we only need 23,500 homes, why the intense pressure for infill methods to bring the total yield to 90,000 ?**

**17. Infill strategies in already developed areas are listed on page 42 as:**

**17.1 Future development in activity centres**

**17.2 infill sites**

**17.3 Dual occupancy**

**17.4 Redevelopment of underutilized multiple dwelling zoned land, including Rural Activity Centres,**

**The GDP's yield projections are tabled on page 43.**

**Infill Strategies**

**18. We agree there are opportunities for new development of major activity centres (17.1), particularly Casuarina Shopping Centre for future residential development in mixed use contexts. Such basic affordable accommodation, near public transport, and cheap eating out, (including at clubs) are attractive to young singles, students, or people living as singles, working on new projects.**

**19. The question still to be answered however, is where do the planners see this development actually occurring, in or around activity centres.**

**20. Inside the Casuarina area, bounded by Dripstone, Bradshaw and Trower Roads, there are many vacant sites, including unused ground level carparks, which could provide such housing. However it would require changes of hours of trading, more multi level carparks, and greater night policing.**

**There are areas of central Palmerston where this could be done with reasonable numbers.**

**It would be quite different to densify around the outside perimeter of commercial centres, disrupting established home owners, and undermining the value of their major life investment.**

**Apart from the major centres, the distributed total potential is small. Residents are resistant to strip denser residential along bus routes within established suburbs.**

**21. Infill sites (17.2) in existing suburbs are not so easily defined. There is residentially zoned land which has not yet been developed and may be used for residential. There is also land with community purposes, conservation and recreational zonings which should not be used for residential.**

**The community is particularly concerned about plagues of applications to rezone land zoned for community purposes, eg. the Charles Darwin University's use of two-thirds of granted Palmerston land being a present case in point; or green open space/heritage.**

**Somewhere in this document, it states then community purpose land could be used for higher order uses. That planner's line should be expunged from word and thought. It is a disgraceful idea for any planner to have or express.**

**22. Dual Occupancy (17.3) may appeal to a small number of home owners with lots of 1000sm and above. However it would not produce a useful yield meaningful yield. Maps on page 39 and 40 show the number of such single dwelling lots in Darwin and Palmerston.**

**Downsides would include:**

**\*Neighbours adversely affected by dual occupancies.**

- \*Makes a mockery of the NTPS. This requires new detached houses in SD zones in Darwin be on lots in excess of 800sm.**
- \*Spoiling of tropical suburban planning by Commonwealth planners, including breeze and solar orientation on lot, loss of shading garden trees.**
- \* Confusion of ownership on common land.**
- \*Extra burdens on suburban infrastructure, including greater local use of airconditioning, electricity, water, drainage and shared parking and traffic.**
- \*Upgrading and replacing existing infrastructure in existing suburbs may disperse the cost.**
- \*Loss of established trees and gardens.**
- \*Loss of character in particular suburbs, by pockmarking of dual occupancies.**

**Many of the suggested lots are in suburbs prized for their large lots, or lovely character. Nightcliff is the ‘Garden suburb’, Bayview has a special setting, Northlakes is set around a golfcourse, and Brinkin is prestigious because of its big lots, houses and gardens. A resident of Nightcliff stated recently that he aims to pass his Bauhinia Street house on to another family to enjoy.**

**A hearing held recently by the Development Consent Authority(DCA) was attended by about 20 people, many of whom from Parap/Fannie Bay, and all but two speaking vehemently against dual occupancies. This has been the attitude for many years.**

### **23. Redevelopment of underutilized multiple dwelling zoned land (17.4) including Rural Activity Centres.**

**This is a difficult category to identify and define. It includes lots zoned MR(Medium density residential - up to 4 storeys) but developed as SD(Single dwelling - 1/2 storeys) or MD(Multiple dwelling duplexes or cluster - 1/2 storeys).**

**There are examples of this group all over Darwin, often as fine developments, eg. at Karama where there was a recent community conflict over new MR building, or at Trower Road, Tiwi, or at the estate in Old McMillans Road.**

**24. Unless these areas are old stock, and owned by the NT Government for rental, it would seem unwise to disturb the lives of the residents, by forced acquisitions of comfortable homes. This would be sure to be contentious. Such existing residences would have had government approval.**

**25. Rather than disrupting suburban residents, the GDP should be accelerating plans for the development of Weddell and the northern part of the Cox Peninsular, even though it may at present fear the cost of Greenfield infrastructure in these locations.**

**26. Densification near Rural Activity Centres will be dealt separately with the Area Plans.**

**27. The Table on page 43 shows the possible total dwelling yield from both greenfields, and infill to be 90,300. There is no need then to force private infill demolitions which would be contentious.**

**28. Areas selected from both infill and greenfield sites like those listed on page 51, will require masterplans.**

**29. The experience of the past ten years means that community will not trust the NTG planners, developers, investors, or their associated organisations alone, such as the Planning Institute, Urban Design Advisory Panel (UDAP) Urban Development Institute of Australia (UDIA), and the Property Council, to prepare such precinct masterplans. These are consistently focussed on their own interests, and to the detriment of the well being of the wider community.**

**These masterplans must be open to real consultation by the wider community.**

**30. The Commonwealth administration years gave us good community planning in the suburbs of Greater Darwin. This planning was designed for tropical living in walkable neighbourhoods, with recognition of conservation constraints, and provision for commercial centres, public open space and community facilities, particularly schools. It was the real basis of a sense of place. The present artificial mode of 'placemaking' is a nonsense beside this real planning.**

**31. This Commonwealth planning set has been seriously eroded in the last five years or so. Examples are the recent crude imposition of the Ludmilla Special School on the Alawa Oval, ignoring local community objections. Another is the refusal to recognise the long established, well informed and publicly exhibited Area Plan for conservation of the Mitchell Creek Catchment in Johnston. Area plans are a central part of the NTPS planning hierarchy. Next two thirds of the Community Purposes zoned land on the CDU campus at Palmerston, was rezoned for residential purposes, without so much as providing for the existing needs of Durack Primary School. These are all examples of very poor planning, against peoples' rights. It must stop.**

**32. Some very poor planning outcomes for climate and community show in large areas of Palmerston, and more recently at Lyons and Muirhead. Partnerships between developers and planners using the Specific Use device which is inconsistent with the standard provisions of the NTPS can result in new suburban areas without community facilities/**

**33. The NTG has adopted energy ratings suitable for a temperate climate, instead of insisting on energy ratings suitable for our tropical climate, and outside way of life. It**



**has also allowed developers to create whole new suburbs whilst refusing to insist on provision for proper conservation zones and usable parklands, apart from drains.**

**Primary schools should be within walking or cycling distance of suburban homes. There should be local community centres, child care facilities, youth engagement places, and small shops, creating and welding a sense of belonging, and local identity.**

**34. The GDP calculates, and illustrates future provision for commercial and industrial land, not only in Area Plans, but also in text and panels. New centres of industry are dotted all over, around ‘activity centres’ in the Northern suburbs, and a whole range of unexpected places, such as adjacent to City Valley. Obsolete ones like Nylander Street have not been converted to residential areas.**

**35. In a small city like Darwin, it would be sensible to concentrate light and heavy industry in separate specific manufacturing and service areas, as is done in Canberra. They variously should be close to raw materials, close to transport and services that can support them, and where heavy traffic, pollution and recycling can be managed. They should not be dispersed, particularly amongst residential areas where the air and water should be fresh for the wellbeing of the population.**

**36. Most Australian capital cities have separate industrial port locations, rather than having heavy industry close to homes. Darwin should already have this strategic goal.**

**There is a strong case for some segregated clean light industrial areas in the rural area.**

**37. What has been noticed in public discussion, as seriously lacking, is NTG analysis in the text and commitment on**

maps to community facilities, public open spaces, conservation zones, and heritage, in some cases even where they are known to currently exist.

Emphatically, it must be formally recognised that these zones are priority areas for members of the Darwin community. Any relegation of them by planners and the NTG, for the sake of industrial development, is simply not acceptable. Communities are no longer willing to live under in the eighteenth or nineteenth century conditions in order to have a job.

38. The GDP seriously lacks recognition of the natural environment, and our tropical climate. This appears to derive from political causes at the national and NTG. However this is affecting building costs, infrastructure provision, greenhouse emissions, climate change, social interaction, and public health.

39. The 'strategic plan' makes little, or no reference to impact of greenhouse gases, generated firstly by the two LNG plants in Darwin Harbour. Darwin will have no access to the gas itself. Later there could be a raft of further air and water polluting industries.

40. The NT is poorly placed to manage and benefit from industries and minerals developments, particularly the face of large multi-nationals. Our Environment Protection Authority (EPA) is small, not independent, has limited coverage, and insufficient power. It is unlike the usual EPA. Pollution control authority is not centralised which makes reporting difficult.

Our jewel of a harbour, so important for tourism and our own recreation, has but a Darwin Harbour Advisory Committee, which has made long term broad policy, but has no authority or regulatory power for enforcement.

**Darwin's experience is of dealing retrospectively with pollution disasters, rather than preventing them. Formally the actions of INPEX are monitored by a consultant company paid by INPEX.**

**41. The GDP has been influenced by calls down south for more city densification and a smaller footprint, leading to planning suggestions inappropriate for the tropical north. Darwin is not Melbourne or Sydney, and has a small footprint in a very large territory.**

**42. Planners should avoid using the Q100 line in assessing land use in the rural area. Fortunately there is a move to 'truthing' sites by tracking vegetation along seepage lines. It is very important to observe the 'constrains' on land use in Greater Darwin, and particularly in the rural area.**

**43. Developers are even now calling for the cutting of 'red tape'. There may be an argument for it in some southern states. Local government should have greater influence in planning in the NT, as in other states.**

**44. Berrimah farm should not be used for development, but remain freestanding as a green belt. As more and more people wish to grow food, it is an area suited to that being done.**

**There should be provision for an official fresh food market in Darwin, and this is a good location for it.**

### **Area Plans**

**45. The greater Darwin Plan stresses the importance of Area Plans in the NTPS. It proposes a series of area plans. However people have remarked on how many inconsistencies and strange anomalies that it would be**

**impossible to accept them as a set of master Area Plans as currently printed. They are also too small for the full detail to be evaluated.**

**Since these Area Plans were not contained in original GDLUP, this is the first chance the community has to comment on them and they are rejected as binding.**

**46. However we will comment about the Rural Area Plan. This area is a very important one. Those who chose to live in this area are entitled to the special lifestyle. Litchfield is very much affected by the physical constraints of wet season inundation. Lots should be also be larger, to allow for living with non reticulated power and water in bush settings.**

**47. We fully accept the response made to the Rural Area proposals by Gerry Wood and Kesia Purick, which is entitled 'Rural Centre Plans (Alternative plans to the Governments Draft Rural Village Plans)'. These set minimise size lots in activity centres and beyond in the rural area, in general, and also describe where there should be activity centres. It stresses that these areas are not suburbs. We accept their assessment since they have consulted local residents.**

**48. Aboriginal friends have commented on errors on the Cox Peninsular Area Plan. We are not aware of planning for Aboriginal people being a part of the GDP.**

**49. We note the references to the 2030 Territory Objective in Section 9, but cannot see the causal linkages from it to the GDP, especially in respect to community benefits in terms of health and education.**

**50. It is ironic that the very first aim of the Territory 2030 Strategic Plan as stated on the GDP, page 3 is that Darwin be:**

**‘recognised as a university city and a hub of international education.’**

**CDU may well have already failed the people of Greater Darwin in this.**

**51. In summary, the GDP is very much about the industrialisation of our own capital city, and not very much about the wellbeing of the community which lives here and deserves more.**

**52. We do not support the proposed planning amendment 2012/0019, as it would destroy the NTPS.**

**MA CLINCH**

**Convener-Plan:the Planning Action Network, Inc**