



Australian Institute of Architects

18 March 2016

Director
Lands Planning
Department of Lands, Planning and the Environment
GPO Box 1680
DARWIN NT 0801
planning.dlpe@nt.gov.au

Dear Director:

Re: PA2016/0056 (Darwin Inner Suburbs Area Plan)

The Institute was pleased to commit time and effort to review of the *Inner Suburbs Draft Area Plan* and to providing a considered response (December 2015).

We are encouraged to observe that the *Inner Suburbs Area Plan* as currently gazetted acknowledges, responds to, or adopts a good number of the recommendations we made with respect to the *Draft*. We also appreciate that a good number of aspects that are required to deliver on the intent of the Area Plan are currently under consideration – particularly with respect to Dual Occupancy in Zone SD, and the Review of the NT Planning Scheme Performance Criteria.

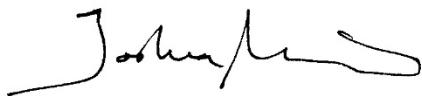
We do not expect that every point submitted for consideration during this process of public consultation will be adopted, and we respect that the role of the Commission is to maintain a holistic view. We are however disappointed that the final *Area Plan* has maintained, with little or no change from the *Draft*, the following elements:

1. Parap Village and Woolner Precinct. We maintain that a multi-deck car park in Parap Village would corrupt the urban design principles that contribute to its current commercial and social success. In addition, we believe that a multi-deck car park is less a solution to a problem, than it is moving the problem somewhere else – as we noted, if you need to build one of these, isn't this an admission that the intensity of use is too high for the capacity of the existing activity centre? We contend that a better way would be to acknowledge that activity centres such as Parap have a physical saturation point, and either adopt management strategies such as 'Park & Ride' to manage traffic flow, or promote the growth of similar precincts in other locations. What if, for example, there were street markets along a reinvigorated Stuart Highway corridor in Stuart Park (accompanied by a rerouted Stuart Highway)?

2. 6, 16 and 25 Blake Street, The Gardens. The proposed redevelopment of this site still leaves significant questions. We noted some inconsistency in the *Draft Area Plan*, in which smaller development sites (eg. 2-10 Dick Ward Drive) required the preparation of Master Plans, whereas it was not required for this larger and more complicated parcel, that involves not only development of significant built form, but new vehicular and pedestrian connections. Such a requirement continues to be lacking in the *Area Plan*. We note that the development of Master Plans seems to be a relatively standard practice for large parcel developments, and is demonstrated in the Commission's own current recommendations for other sites (eg. Greek Orthodox Community Site, Rapid Creek) as well as by former amendments to the Planning Scheme (eg. Amendment to NT Planning Scheme No. 184, Part Lot 5182, Dick Ward Drive, Town of Darwin). We believe that a Master Plan for this site(s) should be required, in part for consistency of approach, and in part because it would provide an opportunity for better design consideration of such aspects as traffic, form, height, wind and noise.
3. The *Area Plan*, in our view, still largely under utilises the potential of the Stuart Highway corridor. Despite having adopted some of our descriptive terminology ("Stitched together by the Stuart Highway"), the *Area Plan* remains little changed in this regard from that which we reviewed in *Draft* form. As we have submitted, we believe that one opportunity not yet fully grasped is of a strong and vibrant Stuart Highway, which might be the artery of the city in ways other than a vehicle corridor – as a primary public transport avenue, with compact and well serviced residential development, active street life, and places of employment.

We appreciate your consideration of our comments in relation to the proposed amendment.

Yours sincerely,



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