



Australian Institute of Architects

23 March 2016

The Hon. Gary Nairn AO
Chairman
NT Planning Commission
GPO Box 1680
DARWIN NT 0801

Dear Gary

Re: Darwin Inner Suburbs Area Plan and Darwin Mid Suburbs Draft 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 were likewise pleased to convene a design workshop in relation to the *Mid Suburbs Area Plans Discussion Paper*, as well as preparing a submission (also December 2015) which captured many of the suggestions put forward by the diverse and experienced group of attendees.

We acknowledge that the tranche of work currently being undertaken by the Commission is substantial and of significant strategic importance to the future of the Northern Territory. It is in this light that we wish to provide comments in respect of the above.

1. Darwin Inner Suburbs Area Plan

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:

- a. 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)?
- b. 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.
- c. 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 have noted the above in comments provided to the Minister with respect to the proposed Amendment.

2. Darwin Mid Suburbs Draft Area Plan

The *Draft Area Plan* picks up on a number of suggestions that were contained in our submission, in particular opportunities that were identified in the context of Nightcliff Village. The "Acceptable Responses" proposed with respect to the Nightcliff and Coconut Grove Activity Centre seem well considered and appropriate, and foundational to a functional activity centre into the future (although we note that there remains a lack of detail regarding the future provision of Department of Housing stock which such redevelopment would replace).

We are disappointed however to see that the opportunities for increased density in the area between Dick Ward Drive and Trower Road, south of Progress Drive, have largely not been considered as a "potential area for change". It is our view that this zone, located between two primary roads, well serviced by public transport, with significant amenity and proximity to services, is practically synonymous with the metrics of the Compact Urban Growth Policy (we estimate the distance between the two roads to be <400m at this point, and squeezed between two "activity centres"). This area should be much more dense.

In addition, we note the following:

- The proposed rezoning of Part Lot 5182 from “Conservation” to “Restricted Development” (Dick Ward Drive west, between Totem Rd and Fitzer Dr) is obscured by having been addressed under “Movement and Transport”. This is potentially misleading. We are also unable to locate where such an Objective has been identified within the accompanying *Draft Needs Assessment*.
- On the land parcel on Fitzer Drive (Part Lot 5182 – Specific Use Zone (SD37)), there is also a marker nominating an “Area of cultural significance”. Likewise for the area proposed as “Specific Use Zone (Zone SD44)” this not only represents an apparent change from the existing Conservation use, but also appears collocated with a “Recorded Sacred Site”. We believe that sites of cultural significance should be appropriately respected, and query how the proposed Planning Principles work to achieve this.
- If an additional road is introduced between Dick Ward Drive and Bagot Road, it should also allow for the introduction of traffic signals, particularly at the Bagot Road intersection. Better still would be no additional road at all.

3. Summary

We ask ourselves, as the Plans prompt us to, whether this is the Darwin we imagine of forty to fifty years hence.

The post-Tracy era commences barely forty years ago. If the subsequent urban development and maturation of Darwin as a city is any guide, we believe a response projecting us forward into the next forty to fifty years can afford to be more ambitious than that currently proposed.

We urge you to pursue a bigger idea for Darwin.

Yours sincerely,



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per Andrew Broffman (NT Chapter President), Simon Scally (NT Chapter Immediate Past President), Col Browne, Steven Huntingford, Richard Layton, and Jo Rees.

cc. Mr. Michael Gunner MLA, Member for Fannie Bay: opposition.leader@nt.gov.au
 The Hon. David Tollner MLA, Member for Fong Lim: minister.tollner@nt.gov.au
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Attachment:

Mark up of respective plans in respect of the points made above.