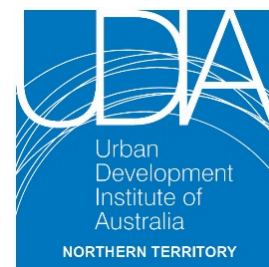


30 June 2021

Dr David Richie
Northern Territory Planning Commission
GPO Box 1680
DARWIN NT 0801



Via Online Submission (ntpc@nt.gov.au)
cc: John-Paul.MacDonagh@nt.gov.au

ATTN: John-Paul MacDonagh

Dear Dr Ritchie,

RE: PLANNING FOR THE FUTURE OF PALMERSTON ENVIRONS

The Urban Development Institute of Australia (UDIA) NT is the peak membership body representing all aspects of the development industry in the Northern Territory. As the independent voice for the industry, we seek to work collaboratively with Government, statutory agencies, service authorities and other industry bodies to represent our members and promote best practice urban development.

The Northern Territory Planning Commission (NTPC) has released the *Stage 1 - Discussion Paper* for the Palmerston Environs Subregional Land Use Plan (PESLUP) for public consultation. It is understood that this consultation phase is the first component of a three-stage planning process to develop a subregional land use plan for the 'environs' of Palmerston, being the land areas surrounding Palmerston. The PESLUP also includes the Palmerston CBD and existing Palmerston suburbs.

UDIA NT offers the following comments from an industry perspective on the proposal:

- The proposed boundaries of the PESLUP extend beyond the 'Palmerston Subregion' as delineated in the Darwin Regional Land Use Plan 2015 (DRLUP). Will there be an amendment to the DRLUP undertaken concurrently? Further information is requested to justify the changing of subregional boundaries set out in the DRLUP.
- The proposed PESLUP includes the focus areas of Greater 11 Mile, Greater Holtze, Virginia South-West, Archer and Mitchell West. It is noted that the focus areas of Archer and Mitchell West are located within the City of Palmerston municipality. However, the focus areas of Greater 11 Mile, Greater Holtze, and Virginia South-West are not currently located, or wholly located, within the City of Palmerston. There is therefore some disjunction in the proposed Palmerston subregional area and the existing City of Palmerston municipal area. This is further clarified as follows:
 - The Greater 11 Mile Focus Area covers the part-suburbs of Pinelands, Berrimah East, Tivendale and Wishart. While Pinelands is already within the City of

Palmerston boundary, the latter three suburbs are currently located in the Unincorporated Rates Area. The latter three suburbs are proposed to be incorporated into an expanded City of Palmerston municipality in a separate process currently underway (discussed further below).

- The Greater Holtze Focus Area covers the new areas of Holtze North, Holtze, Kowandi North and Howard Springs North, and a small portion of Johnston. While Johnston is already within the City of Palmerston municipality, the remainder of the Greater Holtze Focus Area is located within the Litchfield Council municipality.
- The Virginia South-West Focus Area covers a portion of the existing suburb of Virginia, which is located within the Litchfield Council municipality. It is also noted that, although not captured in the Focus Area, Virginia North-West (along Radford Road) and part of Howard Springs (between the Stuart Highway and Whitewood Road) have also been included within the PESULP boundaries.
- Areas within the Litchfield Council municipal area are already subject to the Litchfield Subregional Land Use Plan (LSLUP). Is it the Commission's intention to concurrently remove these areas from the LSLUP? If so, what is the intended benefit, when these areas are already covered by a viable and comprehensive subregional land use plan?
- If greater detail is required to be shown for the future development of Holtze and Virginia South-West within the LSLUP, the Focus Areas and detail already undertaken could easily be incorporated into the existing LSLUP rather than the proposed PESLUP. This would remove any perceived intent to further increase the City of Palmerston's municipal area (and correspondingly reduce Litchfield Council's municipal area) in line with the expanded PESLUP.
- The UDIA NT has recently submitted comments on the proposed expansion of the City of Palmerston Local Government (LG) boundary to include the unincorporated suburbs of Berrimah, Wishart, Tivendale and Elrundie. Given the proposed LG boundary changes are in line with the Greater 11 Mile Focus Area and the proposed PESLUP boundaries, the inclusion of areas of Litchfield Shire into the proposed PESLUP raises the question as to whether additional LG boundary changes will likely be implemented as a result.

As part of the LG boundary submission, UDIA NT provided the following comments (partial and summarised):

- There does not appear to be a formally documented process for any incorporation of unincorporated land into an existing Local Government (LG) area in the NT. That is; there is no publicly available documented process which accurately sets out an open and transparent process in relation to proposed LG boundary changes.
- UDIA NT has requested additional information in relation to the process to date that resulted in the City of Palmerston being the selected LG to incorporate the four abovementioned suburbs. It is noted that the subject unincorporated suburbs also abut the LG area of City of Darwin and Litchfield Council.

- It is unclear how the process of land incorporation, and consideration of each of the four abovementioned suburbs, was initiated.
- These above points are also relevant to the consideration of this PESLUP. Although the implementation of a Subregional Land Use Plan and any proposed municipal boundary change are separate processes under separate legislations, there appears to be a firm and tenable link between the two. This would substantially increase the City of Palmerston's municipal area, and significantly decrease the most likely development areas within the Litchfield Council municipal area. Therefore, UDIA NT offers the same comments for the PESLUP subregional boundary changes as in relation to the LG boundary changes.
- As noted in the discussion paper, subregional plans build on the broad direction in the overarching Darwin Regional Land Use Plan. The land use concepts in a subregional plan are then intended to guide how more detailed Area Plans are developed. However, several area plans within the PESLUP already exist, including the Central Palmerston Area Plan, Archer Area Plan and the Palmerston Eastern Suburbs Area Plans. Is the NTPC able to provide detail as to why a subregional plan was not undertaken prior to the Area Plans? It is unclear what tangible value the proposed subregional plan will provide, given that the entire area is covered by the DRLUP, a portion of the area is covered by the LSLUP, and a large portion of the area is already covered by existing area plans.

The UDIA NT supports a strong strategic framework and robust land use planning objectives. However, some clarity is requested in relation to the proposed subregional boundary changes, potential municipal boundary changes and the benefit to the overall strategic planning process.

We thank you for the opportunity to provide comment.

Should you require any further information, please do not hesitate to contact the undersigned on 0415 933 635.

Yours sincerely



Catriona Tatam

Chief Executive Officer

Urban Development Institute of Australia (NT)

