

21 April 2016

The Honorary Gary Nairn AO  
Northern Territory Planning Commission  
[ntpc@nt.gov.au](mailto:ntpc@nt.gov.au)

Dear Mr Nairn

### **Submission on Dual Occupancy in Zone SD (Single Residential Dwelling)**

The Property Council of Australia – Northern Territory Division welcomes the opportunity to provide a submission on Dual Occupancy in Zone SD. The Property Council of Australia is the peak body representing the property industry in the Northern Territory.

The Northern Territory Division collectively represents billions of dollars of commercial investment in the Northern Territory. The value of the property industry to the NT economy is second only to the Resources sector.

The Property Council's membership draws together key players from property development including owners of commercial office buildings and shopping centres, financial institutions and construction companies. Our membership also extends to those engaged in professions, businesses and provision of services directly associated with the property industry (architects, engineers, financiers, legal and other consultants, suppliers etc.).

As an industry, we not only have a keen interest, but also a financial investment in the future development of the Northern Territory.

We welcome the efforts of the Northern Territory Planning Commission in undertaking research and community consultation to develop a range of land use plans including the discussion on 'dual occupancy' and the subdivision of Single Dwelling (SD) lots.

We note that many Australian jurisdictions have policies relating to dual occupancy, which generally refers to the ability to develop a second dwelling on what has previously been a single residential lot.

From a strategic planning perspective, dual occupancy has the potential to deliver diversity in housing choice and affordability for changing demographics as well as a more compact urban form to reduce urban sprawl and maximise efficiencies through existing infrastructure. This proposal would largely affect urban areas in major centres.

We note that dual occupancy development proposals would be the subject of a development application assessed by the DCA having regard to public submissions. As you would appreciate, our members cover a broad spectrum from developers, investors, owners, manager, financiers, planners, and other professional consultants. Not surprisingly, this issue has attracted both significant interest and significant differences in opinions amongst our members.

In brief, these opinions include:

- Dual occupancy has the potential for greater housing choice, a more compact urban form and more efficient use of existing infrastructure.
- While acknowledging that the likely take up of dual occupancies if permitted within an SD zone will be gradual over a lengthy time period, there is some concern that the potential number of properties able to be utilised for dual occupancy would be quite high and this could result in adverse effect on the existing character of a suburb or locality; this is particularly evident should the minimum lot size be set at 800sqm.
- If dual occupancy is adopted, a minimum lot size of 900sqm, 950sqm or 1,000sqm is generally considered more suitable. The minimum lot size will be dependent upon the dimensions of the lot, the location of the lot on the street/neighbourhood, the size of the road/roads surrounding the lots.
- If dual occupancy is adopted, design controls should include appropriate setbacks, landscaping, parking requirements, infrastructure requirements, stormwater provision, and the impact on amenity of adjoining properties and the surrounding locality.
- The proposed amendment to provide an exemption for dual occupancy developments from the standard 3 metre separation is **not** appropriate as it would clearly alter the existing SD character of the locality.
- The proposed amendment to provide for reduced setbacks for dual occupancy developments is **not** appropriate as it would clearly alter the existing SD character of the locality; this is particularly relevant for setbacks from the front boundary.
- The capacity of existing infrastructure and the impact of dual occupancy developments on traffic and privacy are major concerns.
- Many of the existing neighbourhoods that will be affected by this change do not have the soft and hard infrastructure needed to support this intensification. The various levels of government and service authorities must have adequate plans to ensure the required soft and hard infrastructure can be provided when it is required before dual occupancy is adopted.

Having regard to the divergent views of our members, we believe that it is inappropriate for the Property Council of Australia to adopt a policy position on this issue at this time. Further work should be undertaken by the NT Planning Commission to determine the impact of the proposal; the preparation of a master plan and an infrastructure plan; and further explanation and consultation with the community.

However, we would like to make the following key points:

1. We believe that dual occupancy is worthy of investigation and agree with it being raised by the Planning Commission on behalf of the NT Government in order to seek the opinions of the community.
2. The Property Council is strongly supportive of infill development and dual occupancy can be a suitable means of achieving a greater number of homes in the established urban area, minimising

urban sprawl, reducing infrastructure costs, and achieving a desirable level of amenity in the older suburbs.

3. Infrastructure capacity in the older suburbs will be critical to the implementation of a dual occupancy policy and we believe that this should be examined in detail prior to any decision being made on the introduction of a dual occupancy policy.

We look forward to continuing to work with the Northern Territory Planning Commission and the Government on strategic planning policy matters relating to the Northern Territory.

Should you have any queries or require elaboration, please do not hesitate to contact [rpalmer@propertycouncil.com.au](mailto:rpalmer@propertycouncil.com.au)

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ruth Palmer', with a stylized, flowing script.

Ruth Palmer  
NT Director