

The Hon Gary Nairn AO
Chairman
NT Planning Commission
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Dear Mr Nairn

RE: Submission on Holtze Area Plan

The Property Council of Australia welcomes the opportunity to provide a submission on the Holtze Area Plan.

The Northern Territory Division of the Property Council of Australia 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, owners of commercial office buildings and shopping centres, financial and legal institutions, and construction companies. Our membership also extends to those engaged in the professions, business or industry directly associated with the property industry (such as architects, engineers, financiers, 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, and we appreciate and take seriously the opportunity to provide comment on strategic planning proposals for the NT.

We commend the Northern Territory Government and the Planning Commission for continuing its efforts to pursue strategic planning that will guide long term land use, development and investment within the Darwin Region and throughout the Territory. Further, we understand that comprehensive and meaningful plans take time and we urge the Government to put the long-term wellbeing of Territorians ahead of short-term priorities that are tied to political cycles.

Overview

The development of land at Holtze is supported by the Property Council following on from the development of the new hospital; however, both residential and non-residential development should be sensitive to the proximity of the adjoining rural living areas and future hospital uses.

The Property Council believes that further work is needed to integrate future development at Holtze into the City of Palmerston and, in the first instance, there needs to be close communication between the Territory Government and the City of Palmerston to progress master planning of the interface.

The Property Council of Australia's Northern Territory Division has long advocated the need for a comprehensive, integrated plan for the Greater Darwin Area and for the implementation of the Darwin Regional Land Use Plan. It would be encouraging to see the Darwin Regional Land Use Plan come into play as the 'bigger picture' for overall planning of the area prior to the Holtze Area Plan being finalised.

It is our view that commercial uses planned in the Draft Holtze Area Plan may hinder development in the Palmerston City Centre which would be detrimental for the City.

Serious consideration needs to be given to how best to develop the land at Holtze to ensure that it does not have a long-term negative impact on the Palmerston City Centre. The City of Palmerston is making significant improvements to the Palmerston City Centre to encourage high density residential development and commercial development. There is a significant risk that the height level of commercial activity proposed for the Holtze area will significantly limit further development in and around the Palmerston City Centre.

Critical Comments

We make the following comments on some of the specific issues raised in the draft plan and consultation paper.

Residential and Urban Planning

- While some residential densities are indicated on the area plan map, the residential areas outside of the “compact walkable neighbourhoods” have no density indications. The planning principles specify a ‘mix’ of densities without any greater qualifying terms.
- Given recent development patterns and approvals, it is reasonable to expect that developers could take advantage of the lack of clarity here and develop a primarily small lot hub which is considered undesirable in this location.
- The smaller the lot becomes relates to the location of useable open space on the block with the area to the front of the block becoming important. This then will require the attention to how the street scape will work in relation to this space with front fencing, security to these spaces, privacy and street surveillance. It also will need to look at deep soil planting zones to enable large trees to be grown as part of street scape provision of shade. Currently the outcome for this area is mainly a bit of grass and a few scrubs.
- The suburb of Holtze has a relatively close proximity to the Palmerston City Centre and the surrounding suburbs. The Property Council believes that the Holtze Area Plan would be better served as a joint Master Plan with the City of Palmerston, rather than disconnected area plans that have little or no relationship to each other.
- The benefits to a holistic Master Plan are integrated commercial and residential provisions, services, transport routes and recreation facilities. This in turn, we believe, would provide better outcomes for urban amenity and in developing appropriate supply and demand.
- The design of subdivisions with street widths, easements, public footpaths and cycle ways also need to be considered with an appreciation that visitor parking needs to be accommodated additional to that provided on the blocks.

Commercial Planning

- The Service Commercial component in the Holtze Area Plan must have restrictions that limit the commercial portion to being only supplementary and / or ancillary to the health services use of this development.
Such a change would likely bring about global changes to the zone (ideally) or make the Service Commercial component at Holtze a ‘Specific Use Zone.’

- Has the NT Government undertaken a study to determine what the appropriate amount of land zoned commercial is needed within the City of Palmerston over the medium to long term, and more importantly, where the appropriate location for this commercial activity should be?
- Further to point 1 above, given the market and availability in Darwin, there does not appear to be demand currently for Service Commercial land or even 'bulky goods'. - It is unclear as to why a large Service Commercial area has been provided here when the entire adjacent suburb of Yarrowonga is Service Commercial in nature.
- We would like to see more definition in regard to the 'Mixed Use Medical Precinct and "Hub of Urban Growth." This is very open to interpretation and elaboration.

Transport and Infrastructure

- Future Arterial Corridor to Glyde Point – is this currently under consideration or being coordinated with the Department of Transport given the likelihood of future movements of heavy transport directly through the centre of the development?
The Holtze Area Plan quotes *"The corridor is likely to remain undeveloped into the foreseeable future."* The Property Council feels that this approach to planning and infrastructure will impede / influence future growth and development.
- The Stuart Highway is a significant barrier between the Holtze development area, Palmerston and its surrounds. How is this being considered in the context of the national Transport network given that this section of the Stuart Highway will remain the main national transport link between Darwin and the rest of the nation?
- For Planning Principle No. 10 in the Area Plan, a social infrastructure assessment will only work if it covers the entire suburb of Holtze.
- A social infrastructure assessment must be undertaken by the Northern Territory Government and proposed developments within Holtze must comply with the outcomes of the assessment. This would be an opportunity to further move on the master planning with Palmerston to ensure integration of the two areas.

The Property Council is the peak body representing the property industry in the Northern Territory. We appreciate the opportunity to comment on Holtze Area Plan and look forward to continuing to work with the Planning Commission on the completion of the final plan and on other strategic planning matters relating to the Northern Territory.

Should you have any queries or require elaboration, please do not hesitate to contact the NT Director, Ruth Palmer on rpalmer@propertycouncil.com.au

Yours sincerely



Ruth Palmer
NT Director