

Formal Submission of Objection

Proposal: PA2026/0205 – Planning Scheme Amendment

Subject: Proposed Planning Scheme Amendment to Zone LR (Low Density Residential) – Minimum Lot Sizes and Infill Development

Affected Localities: Rapid Creek, Nightcliff, Millner, and Coconut Grove

Submitted by:

Name: Debra Gay Shields

Address: [REDACTED]

Email: [REDACTED]

Phone:

- [REDACTED]
- [REDACTED]
- [REDACTED]

I am writing to formally lodge my strong objection to the proposed Planning Scheme Amendment PA2026/0205.

I have been a resident of Rapid Creek since 1980 and a rate-paying homeowner at my current property since 1982. My decision to purchase in this locality was based specifically on the low density and large blocks of the area, with open tropical setbacks, privacy and substantial garden spaces.

While I recognise the broader need for diverse housing supply across the Northern Territory, I believe that blanket down-zoning via a reduction in minimum lot sizes in established suburbs is an inappropriate mechanism. It rewards speculative development at the direct expense of existing community residents, privacy, infrastructure, suburban amenity, and climate comfort.

1. Erosion of Neighbourhood Character and Tropical Architecture

The older established suburbs of Rapid Creek, Nightcliff, Millner and Coconut Grove possess a distinct Territory lifestyle character defined by elevated houses, generous setback buffers and mature vegetation. Incremental changes have already eroded elements of this character.

The proposed reduction in minimum lot sizes would be the cause of demolition of original climate-appropriate dwellings, to be replaced with inappropriate concrete structures entirely out of character and lacking architectural merit, with the distinct possibility to become widespread over time.

2. Conflict with Long-Term Resident Investment Expectations

Properties within this northern suburbs precinct command a financial premium specifically because of their large block sizes and low-density zoning protections. Homeowners like myself purchased into this zone with reasonable planning expectations of long-term privacy, large open garden spaces, mature tree canopies and structural separation. Subdividing these blocks would create higher density dwellings, visually unappealing structures and severe acoustic issues where daily household noises compromise the quiet enjoyment of long-term residents.

3. Encroachment of Visual and Acoustic Privacy

Higher density via reduced block size and boundary setbacks severely degrades residential privacy. Higher density dwellings on smaller blocks inevitably leads to privacy issues with direct lines of sight through windows and doors into adjacent properties, and loss of views toward established green canopies. The closer proximity of buildings amplifies sounds, reducing the functional indoor and outdoor living spaces that define Zone LR, reducing enjoyment of lifestyle.

4. Compounding On-Street Parking Deficits and Traffic Hazards

Dempsey Place and the broader Rapid Creek, Nightcliff, Millner and Coconut Grove areas already experience significant parking and traffic pressures due to the close proximity of multiple primary/secondary schools, childcare centres, churches, businesses, local markets and pockets of high density housing.

Modern trends mean average households now retain two or more vehicles, driven largely by adult children residing at home due to broader housing affordability challenges. In restricted urban areas like cul-de-sacs this vehicle load is already at capacity. Allowing further infill into these streets will result in hazardous overflows of on-street parking, severely restricting line of sight visibility for vehicles entering and exiting driveways, creating a distinct safety risk for local children and pedestrians.

5. Worsening Local Traffic Congestion and Bottlenecks

The local road network already struggles with severe traffic bottlenecks during peak school drop-off/pick-up times, morning/afternoon work commute times, market times and during community events. The physical capacity of these intersections cannot absorb the cumulative traffic generation of higher density dual-occupancy subdivisions without causing systemic gridlock.

6. Sewerage Infrastructure Failures

The existing sewer network in the Rapid Creek and surrounding areas is clearly operating at or above capacity and cannot sustain increased density. During periods of prolonged wet season rainfall, the downstairs toilets at my property routinely gurgle and fail to flush due to systemic backpressure in the main line.

Any potential internal property faults have been fully mitigated. The sewerage easement traversing my backyard has previously been updated to modern PVC, my property's internal connections, including the connection to the main line, were fully replaced with new PVC ten years ago, and my overflow relief gully (ORG) is entirely clear. The failure lies with the under-capacity of the public sewer network. Adding further connections to an infrastructure asset that already fails during common wet season rainfall constitutes planning negligence.

7. Water Ingress and Compromised Overland Runoff Flow Paths

While my property is not classified as within a primary flood or storm surge zone, localised urban flooding has occurred in the surrounding area. During previous heavy wet season rainfall, houses situated further downhill in my cul-de-sac suffered direct internal water inundation.

The flooding occurred because the natural overland runoff flow pathways were impeded by down-slope houses and gardens. Replacing permeable ground with impervious surfaces (foundations, outbuildings, concrete driveways) will further block runoff pathways, accelerating stormwater velocities and increasing the risk of urban flooding and damages to adjacent low-set properties.

8. Microclimate Degradation and Urban Heat Island Effect

Mature gardens and established tree canopies provide vital shade and ambient cooling, essential to Darwin's tropical climate. Subdividing Zone LR allotments forces the systemic clearing of the mature vegetation canopy.

Replacing this greenery with extensive hard, heat-absorbing surfaces, such as concrete slabs, metal roofing, driveways and masonry walls, will systematically trap heat during the day and radiate out at night. Higher density housing will eliminate cooling ambient breezeways and cause a pronounced suburb-wide Urban Heat Island effect. This temperature spike will be compounded by a high concentrations of adjacent air-conditioning units discharging exhaust heat into confined boundary setbacks.

Conclusion

Amendment PA2026/0205 represents a blunt tool applied to a complex urban environment. Rather than a blanket reduction of standards across Zone LR, housing density should be directed to dedicated transport corridors through localised Area Plans that mandate adequate infrastructure.

I request that the Minister refuse this amendment in its current form to protect the environment, infrastructure and social integrity of Darwin's established northern suburbs.

Sincerely,

Debra Gay Shields



Dated 28 July 2026

Dear Sir/Madam

Re: Planning Scheme Amendment PA2026/0205

I wish to make a submission in relation to Planning Scheme Amendment PA 2026/0205.

I fully support the proposed amendment to facilitate infill development and subdivision in Zone LR through reduced minimum lot sizes and increased housing choice.

The amendment recognises that housing needs have changed. In established suburbs such as Nightcliff and Rapid Creek, housing affordability is increasingly preventing younger generations from remaining in the communities in which they were raised. Equally, many older residents wish to age in place but do not need or want to maintain a large residential allotment. The proposed reforms will help provide more diverse housing options while preserving the character and amenity of these established neighbourhoods for people like me and my children who have been raised in the area.

My concern relates to the proposed exclusion of land affected by flooding and storm surge overlays.

The Town of Nightcliff is particularly affected by the storm surge overlay, yet it contains many properties that would otherwise be well suited to subdivision and modest infill development. As a result, the proposed amendment may have a disproportionately limited effect in the very areas where it could make a meaningful contribution to increasing housing supply and diversity.

A significant proportion of lots in the Nightcliff and Rapid Creek areas that would otherwise be suitable for subdivision are affected, either wholly or partially, by these overlays. The amendment effectively creates a blanket prohibition on subdivision, dwelling-group and dwelling-multiple developments on such land, regardless of the level of actual risk.

In many cases, these properties may only be affected during extremely rare events, particularly where land is located within a secondary storm surge zone, yet they are treated in the same manner as land subject to a much higher flood or storm surge hazard. This approach unnecessarily excludes a large number of properties from the benefits of the amendment and disproportionately impacts established suburbs where infill development could make a significant contribution to housing affordability, housing choice and the objectives of the planning scheme amendment.

There is also some ambiguity between the explanatory document and the draft amendment.

The draft amendment states that consent must not be granted on land in Zone LR that is subject to the flooding or storm surge overlays for the creation of new lots or dwelling-group and dwelling-multiple developments (clause 3.6 LSF and 3.7 LSSS). In contrast, the explanatory document refers to development being prohibited on the "affected portion of lot", which suggests a more limited restriction (clause 4.1, page 4 of the Explanatory Document).

There needs to be clarification as to whether the prohibition applies:

1. To the entire lot where any part of the land is affected by an overlay; or
2. Only to the portion of land affected by the overlay.

More importantly, **I submit that the amendment should not impose an absolute prohibition. Instead, the Consent Authority should retain discretion to assess applications on a case-by-case basis**, in areas affected by the storm surge overlay, having regard to matters such as:

- The extent of the land affected by flooding or storm surge;
- Whether proposed lots and access arrangements can be located outside identified hazard areas;
- Proposed mitigation and remediation measures;
- Building design, floor levels and resilience measures;
- Emergency access and evacuation considerations; and
- The level of risk demonstrated by contemporary engineering, hydrological, and storm surge studies.

A performance-based assessment framework would better balance the need to manage natural hazards with the objective of increasing housing supply and diversity. It would also encourage landowners to incorporate modern flood and storm surge mitigation measures into both new and existing developments, improving the overall resilience of the housing stock over time.

This presents an excellent opportunity to encourage the renewal of ageing housing stock through contemporary developments designed to modern engineering, construction and climate-resilience standards. New dwellings can incorporate elevated floor levels, improved structural resilience, appropriate site drainage, flood-compatible design and other measures that significantly reduce risk and enhance community safety.

Importantly, encouraging the replacement of older dwellings with more resilient housing may also help address the increasing cost of insurance in areas affected by natural hazard overlays. Insurance affordability has already emerged as a significant issue in nearby suburbs such as Millner, requiring government intervention. While existing homes are unlikely to undergo substantial retrofitting or redevelopment in the short to medium term, meaningful improvements in resilience are most likely to occur through the redevelopment of ageing properties that have reached, or are approaching, the end of their economic life. The proposed reforms should encourage rather than discourage this transition.

Rather than excluding a substantial proportion of lots in Nightcliff and Rapid Creek from participating in the proposed reforms, a discretionary assessment process would enable the Consent Authority to approve suitable developments where hazards can be appropriately managed, while still refusing proposals that present an unacceptable level of risk. This would address concerns regarding emergency response and evacuation arrangements while facilitating the gradual replacement of older dwellings that were not designed to contemporary flood, storm surge and resilience standards.

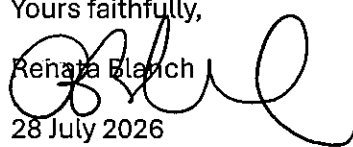
For example, where only part of a property is affected by an overlay, it may be possible to locate new lots, building envelopes and access ways outside the affected area, or to undertake carefully designed filling and level-raising works to achieve compliant development standards and mitigate risk without adversely affecting streetscape character or neighbourhood amenity. Such

proposals should be capable of being assessed on their individual merits rather than being automatically excluded, particularly where expert engineering evidence demonstrates that the residual risk can be effectively managed and reduced to an acceptable level.

A blanket prohibition may unintentionally undermine the broader objectives of the amendment by preventing well-designed and low-risk infill development in established suburbs where demand for housing is high and infrastructure already exists. A merit-based approach would allow the Consent Authority to distinguish between sites where hazards can be appropriately managed and sites where development should not proceed.

I respectfully request that the proposed prohibition be reconsidered and replaced with a performance-based assessment framework that allows the individual circumstances of each site to be properly evaluated. Such an approach would maintain appropriate safeguards for public safety while ensuring that the amendment achieves its intended objectives of increasing housing supply, improving affordability and providing greater housing choice in established suburbs.

Yours faithfully,


Renata Blanch
28 July 2026

Formal Submission Form

To: Lands Planning, Department of Lands, Planning and Environment

Delivery Method: Online Submission Portal

Date: 28 July 2026

RE: SUBMISSION IN SUPPORT OF PLANNING SCHEME AMENDMENT – PA2026/0227

- **Proposal:** Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential)
- **Key Mechanisms:** Reducing minimum lot size from 800m² to 450m² and expanding permissible housing types
- **Submitter Name:** Shane Gerard Phillips
- **Submitter Address:** 6 Stanford Way Durack NT 0830
- **Contact Details:** E: spindarwin@bigpond.com M: 041 965 1035

Dear Assessment Team,

I am writing to formally lodge my strong support for the proposed Planning Scheme Amendment PA2026/0227. The decision to lower the minimum lot size in Zone LR to 450m² and permit diversified housing types is a progressive, necessary policy shift. It directly addresses the Territory's pressing residential challenges.

As a property owner, I believe this amendment unlocks critical strategic benefits for the Northern Territory:

1. Optimisation of Existing Infrastructure

Suburbs across Greater Darwin and Palmerston feature vast, underutilised low-density lots already serviced by established roads, water, sewage, and electricity grids. Prioritising "gentle density" through infill development allows the Territory to absorb population growth efficiently. This reduces the financial burden on taxpayers required to fund expensive new greenfield utility extensions.

2. Improvement of Housing Supply and Affordability

The Territory is facing an acute housing availability crisis. Shrinking the minimum lot threshold from the historical 800m² standard to a flexible 450m² footprint lowers the barrier to property ownership. This reform empowers existing homeowners to safely subdivide, creating more affordable entry points into highly sought-after, well-located residential areas.

3. Support for Multi-Generational Living and Aging in Place

Limiting Zone LR primarily to large single-family homes no longer reflects contemporary demographic realities. Allowing diversified housing choices—such as smaller, low-maintenance homes on compact blocks—enables aging downsizers to remain in their lifelong communities. It also provides independent housing options for young Territory families and multi-generational households.

4. Safe and Equitable Property Rights

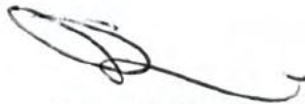
Crucially, this framework preserves community choice because subdivision remains entirely optional. It protects the unique character of Territory neighbourhoods while granting willing landowners the financial autonomy to downsize, develop, or adapt their property to suit modern lifestyles.

Recommendation for Final Approval

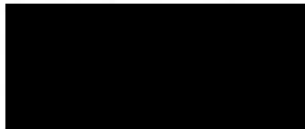
I encourage the Minister for Lands, Planning and Environment to finalise and adopt amendment PA2026/0227 swiftly without diluting its core density objectives. This policy aligns closely with the Northern Territory Planning Commission's framework to responsibly fast-track sustainable housing stock.

Thank you for considering this submission in support of the amendment.

Yours sincerely,



Shane Phillips



Kind regards,
Dilip Nellikat
(ex. Alice Springs Town Council employee and Manager of Developments)

LR parcels 900m2 and larger subdivided

I object to this ruling or planning amendment **if it does not specify the maximum building house ratio**. I do not believe the building envelope should be allowed to be more than 50% of the new sub-divided plot.

Drive ways should be encouraged to be permeable surfaces. (Grassed block work).

No more than 60% of the plot should be impermeable area (including swimming pools and hard surfaces).

Darwin's newer suburbs are a heat sink and make our city hotter and more unliveable. (This is documented by CSIRO).

Impermeable surfaces create flooding problems.

Tiny homes and trailer houses should encouraged.

% canopy cover should be maintained when increasing density.

Shared access driveways are an advantage of large blocks with 2 homes so shared driveways should be accommodated if subdividing large blocks.

Subdivisions will not necessarily increase density if larger blocks already have 2 homes on them.

Robin Knox

[REDACTED]

[REDACTED]

Submission — Proposed Planning Scheme Amendment: Infill Development and Subdivision in Zone LR (Low Density Residential)

To: NT Planning Commission, GPO Box 1680, Darwin NT 0801 / planning.ntg@nt.gov.au

From: Owen Kelly

Date: 10/08/2026

Signature:

A handwritten signature in black ink, appearing to be 'Owen Kelly', written over a horizontal line.

Summary

I am a resident of Alice Springs and support the intent of this amendment. Zone LR as currently drafted locks up serviced, well-located land at a density that no longer reflects household size or housing need, and the case for infill made in Section 2 of the explanatory document is sound. We are not opposed to smaller lots, to dwelling-group and dwelling-multiple becoming merit assessable, or to battle-axe configurations in constrained circumstances.

Our objection is narrower and, we think, correctable. Every provision this amendment alters is a control on *how much* can be built. Minimum lot size, variation allowance, density, frontage, lot configuration — all quantity. Not one corresponding change is proposed to the provisions that determine whether what gets built will function in the climate it is built in. In Alice Springs that omission has consequences the scheme is currently unable to manage: loss of mature canopy, increased hard surface and ambient heat, reduced infiltration into a groundwater resource that is not renewable, and increased peak stormwater discharge into drainage networks sized for a different pattern of development.

There is a related gap at the street boundary. Zone LR has no fencing provision at all, and the amendment will roughly double the number of street frontages per unit of land while narrowing each of them.

We ask that the amendment not proceed in Zone LR in Alice Springs without accompanying provisions addressing site permeability, deep soil and canopy, existing tree retention, on-site stormwater management and fencing to the street boundary. Specific drafting recommendations are at the end of this submission.

1. The subdivision pathway carries the fewest controls

The amendment makes dwelling-group and dwelling-multiple merit assessable, which brings them within Clause 5.2.6.1(5) — not less than 30% of the site landscaped — and, for dwelling-multiple, Clause 5.4.7 communal open space, Clause 5.4.8 building design and Clause 5.4.17 articulation. That is a reasonable package.

The subdivision pathway attracts almost none of it. Two dwellings-single on two newly created 450 m² lots produce the same or greater aggregate ground coverage as a duplex on the original 900 m² site, and trigger no landscaping requirement at all. Clause 5.2.6.1(5) does not extend to dwelling-single. Zone LR has no site coverage control and no plot ratio control — Clause 5.4.19 applies only in Zones MR and HR. The only permeability and deep soil provisions that reach a dwelling-single are Clause 5.4.6.1(2)(d) and (2)(e), and both are expressed as "should", both are variable under Clause 5.4.6.1(1), and both are very small.

A dwelling-single on a 450 m² lot requires 50 m² of private open space open to the sky, of which half must be permeable. That is 25 m² — around 5.5% of the site — and it is discretionary. Nothing else in the scheme requires a single square metre of that lot to remain unsealed.

The first illustration in Section 4.4 of the explanatory document shows exactly this outcome: two indicative 456 m² lots, 12 m frontages, on what was a single block. It is presented as the standard case. Under the amendment as drafted, that case is the least controlled development available in the zone.

2. The amendment has not been tested against the arid climate objectives in its own strategic framework

Section 5.2 of the explanatory document asserts alignment with the NTPS strategic framework, and cites housing diversity, efficient use of infrastructure and efficient use of land. Those objectives are real and the amendment does advance them. But the strategic framework applying to Alice Springs contains a second set of objectives that the explanatory document does not mention.

The Alice Springs Regional Land Use Plan 2016 lists among its Key Urban Residential Objectives "respond to climate change and address the urban heat island effect", and among its Key Development Structure Objectives "encourage urban design that takes account of the arid climate to minimise the creation of heat islands". Its open space objectives recognise the role of urban green space in reducing urban heat impacts. On water it is unambiguous: the town's supply is drawn from confined aquifers, the resource is described as non-renewable and effectively being mined, water levels at Roe Creek have fallen since extraction began in the 1960s, and the Plan states that water sensitive urban design should be included in all

development. It also observes that a low ratio of impervious to natural surface assists annual aquifer recharge.

The Central Alice Springs Area Plan carries the same direction into outcomes 1.4 and 11.3, seeking innovative responses to heat mitigation, greening and cooling mechanisms and water sensitive design.

An amendment whose principal physical effect in Alice Springs will be to increase the proportion of each residential lot occupied by roof and pavement should be assessed against these objectives explicitly. At present it is not. We ask the Commission to require that assessment before reporting to the Minister.

3. Canopy cannot be retrofitted, and the amendment removes the room for it

The cooling infrastructure of established Alice Springs suburbs — Gillen, Braitling, East Side, Sadadeen — is largely mature trees in private back yards, planted forty to sixty years ago. They are the reason those streets are habitable in January. They are not protected by anything in the NTPS. Clause 5.2.6.1(3)(d) asks that significant trees be retained, but that sub-clause only operates "where landscaping is required by this Scheme", and for a dwelling-single it is not required. A subdivision application in Zone LR can presently be lodged, assessed and approved without any plan showing what vegetation exists on the site.

The amendment makes removal of that canopy the path of least resistance, because a mature tree standing in the middle of a 900 m² block is precisely the obstacle to a two-lot subdivision.

Nor does the amendment leave room to replace what is lost. A 450 m² lot with a 12 m frontage, a 3 m front setback under Clause 5.4.3.3, and a permitted zero setback to one side boundary has very little unbuilt ground, and Clause 5.4.6.1(2)(e) asks only for one deep soil area of 5 m² with no dimension less than 1.5 m. A 1.5 m wide strip will grow a shrub. It will not grow a tree with a canopy capable of shading a roof or a west wall, and it cannot supply the uncompacted root volume a large-canopy species needs to reach maturity in this soil and this rainfall.

We note the explanatory document offers Ochre Court in Alice Springs as evidence that smaller lots work. The relevant test is not whether a house fits on the lot. It is whether the resulting dwellings are comfortable and affordable to run through a Central Australian summer, and whether the streets they form are walkable in February. We are not aware of any post-occupancy or thermal performance review of the existing 450–600 m² stock in Alice Springs. If one exists it should inform this amendment. If it does not, the claim in the explanatory document is doing more work than the evidence supports.

We would also caution against relying on the NCC to deliver thermal performance here. NatHERS assessment uses a regional climate file and does not model site microclimate, shading from adjacent buildings, or the presence or absence of vegetation. Two identical dwellings, one shaded by an established tree and one on a stripped lot with a west-facing zero-setback wall, will produce the same star rating and will not perform the same way. Planning is the instrument that governs the difference, and this amendment relaxes it.

4. Stormwater and permeability

Rainfall in Alice Springs is low in annual total and delivered in a small number of short, intense falls. Existing suburban lots absorb a meaningful proportion of that on site, across unsealed yards, before the remainder reaches the kerb. Reticulated drainage in the older suburbs was designed against that pattern of ground cover.

The amendment increases impervious area lot by lot, with no trigger anywhere for assessment of the cumulative effect within a catchment. Clause 6.2.3(3) addresses site grading for lots under 600 m², not on-site retention. Clause 6.2.4 addresses connection to infrastructure, not hydraulic capacity under an altered runoff regime. Each application will be assessed alone, on its own merits, and the aggregate cost of the resulting increase in peak discharge will fall on the Alice Springs Town Council and on downstream property owners rather than on the developments that generate it.

The same provision solves both problems. Ground kept permeable retains water on site, reduces peak discharge, supports the vegetation that provides shade, and contributes to the infiltration the Regional Land Use Plan identifies as valuable. Sealing it does the opposite on every count.

5. Fencing and the street boundary

Zone LR contains no fencing provision. Clause 5.4.18.1 applies only in Zones MR and HR, and Zone LMR has none either. This amendment moves Zone LR toward lot sizes and densities previously associated with the low-medium and medium density zones, and does so without picking up the one control the scheme uses to manage the interface between a private lot and the street.

The scheme already knows what good practice looks like here. Clause 5.4.18.1(4) caps fences on road boundaries and boundaries adjoining public open space at 2 m, and limits the area of material that is not visually permeable to an area equivalent to the length of that boundary multiplied by 1.2 m — in effect a solid element to 1.2 m with visually permeable treatment above. Sub-clause 5 requires fencing within 1.5 m of driveways, pedestrian entries and street corners to be visually permeable above 0.6 m so that sightlines are maintained where vehicles cross the footpath.

The Community Safety Design Guide, a Schedule 5 reference guideline of this Scheme, is more direct again. It states that front fences should be either visually permeable or less than 1.2 m high to enable surveillance of the street, and identifies solid front walls as blocking views to and from the street and reducing the interaction between the private and public domains. Its application checklist asks whether front fences are low, or not solid.

That guide is given effect through Clause 5.5.3(1), which requires an application to demonstrate consideration of it. But Clause 5.5.3 applies to commercial, civic, community, recreational, tourist and mixed use development. It does not apply to residential development in Zone LR. The Territory therefore has a Crime Prevention Through Environmental Design guide with a clear, specific position on residential front fencing, and no mechanism to apply it to residential development in the zone that occupies most of the residential land in Alice Springs.

The practical result will be familiar to anyone working here. Solid front fencing at 1.8 m or above, commonly blockwork or steel sheet, is widespread across Alice Springs suburbs, and it is built for reasons residents hold sincerely. The position taken in the Territory's own guide, and in the CPTED literature it draws on, is that removing occupants' view of the street does not reduce risk overall — it removes the informal surveillance that deters opportunistic behaviour and that makes a street feel usable on foot. An individual householder cannot act on that; it is an aggregate effect. Planning is the only instrument that operates at that scale, and in Zone LR it currently does nothing.

The amendment sharpens the issue in two ways. It increases the number of street frontages per unit of land, so front boundary treatment becomes a larger proportion of what the streetscape actually is. And it reduces the minimum frontage to 12 m, of which Clause 5.2.4.5 preserves only 6.5 m as continuous frontage free of driveway or on-site parking. On a 12 m frontage with a single 3.5 m driveway, the fenced portion is a short, high, blank element immediately adjacent to a vehicle crossing — the precise sightline conflict that Clause 5.4.18.1(5) is drafted to prevent in Zones MR and HR.

There is a thermal dimension as well, which is why we raise fencing in the same submission as heat. A solid masonry or sheet metal fence on a street boundary absorbs radiation through the day and re-radiates it into the footpath and the front yard in the evening, and it blocks air movement across the lot. Where the amendment permits a 3 m front setback to habitable rooms under Clause 5.4.3.3, a 2 m solid fence 3 m from a living room window produces a small, hot, still enclosure rather than usable outdoor space — and does so on the elevation where the offsetting increase in private open space under Clause 5.4.3.3(5)(a) is supposed to be delivered.

6. Zero setbacks and orientation

Clause 5.4.3.3 permits a zero setback to one side boundary on lots between 300 m² and 600 m², and newly created infill lots will satisfy sub-clause 4(b). In a hot dry climate the orientation of

that wall matters a great deal. A zero-setback wall on a western boundary receives full afternoon summer sun, cannot be shaded by planting on its own lot, and radiates into the adjoining property. The clause is silent on orientation.

7. Alice Springs is currently treated differently, and the amendment removes that distinction without explaining why

Clause 6.2.1(1) presently restricts lot size variations to 5% in Zone LR, and separately in Zones LR and MR in Alice Springs and adjacent zoned areas. The amendment lifts Zone LR to 10% Territory-wide while retaining 5% for Zone MR in Alice Springs. Whatever reasoning led to the Alice Springs-specific control in Zone LR is not addressed in the explanatory document. We ask that it be identified and reconsidered on its merits rather than removed as a consequential change.

Recommendations

We recommend the amendment proceed only with the following additional provisions. Each could be implemented as a location-specific development requirement under Clause 5.9 applying to Alice Springs, which is the mechanism the NTPS already provides for exactly this purpose, or as amendments of general application.

1. **Minimum permeable area.** Introduce a requirement that not less than 25% of any lot in Zone LR less than 600 m² remain permeable, unroofed and unpaved, applying to dwelling-single as well as to dwelling-group and dwelling-multiple. This should be a requirement the consent authority must not vary below a floor, not a "should".
2. **Deep soil and canopy.** Replace the 5 m² / 1.5 m deep soil provision in Clause 5.4.6.1(2)(e) with, for Zone LR in Alice Springs, at least one contiguous deep soil area of not less than 20 m² with no dimension less than 4 m, sited to allow a canopy tree to shade the northern or western elevation of the dwelling at maturity.
3. **Tree retention.** Require any subdivision, dwelling-group or dwelling-multiple application in Zone LR to be accompanied by a plan identifying existing trees over 3 m in height, with retention as the default position and replacement planting of equivalent mature canopy where removal is demonstrated to be unavoidable.
4. **Landscaping.** Extend Clause 5.2.6.1(5) so that a proportionate landscaping requirement applies to dwelling-single on lots less than 600 m² in Zone LR, so that the subdivision pathway is not less controlled than the merit assessable pathway.
5. **Stormwater.** Require subdivision, dwelling-group and dwelling-multiple applications in Zone LR in Alice Springs to demonstrate no net increase in peak discharge to the public

drainage network relative to the pre-development condition, through on-site retention or detention, for a nominated design event agreed with the Alice Springs Town Council.

6. **Fencing.** Extend Clause 5.4.18 to Zone LR, either by amending the heading of Clause 5.4.18.1 to read "Fencing in Zones LR, LMR, MR and HR" or by inserting a new Clause 5.4.18.2 adopting the same requirements: a maximum height of 2 m to any road boundary or boundary adjoining public open space; non-visually-permeable material limited to an area equivalent to the length of that boundary (excluding driveways) multiplied by 1.2 m; and visually permeable treatment above 0.6 m within 1.5 m of driveways, pedestrian entries and street corners. Add Clause 5.4.18 to the Zone LR assessment table against dwelling-single, dwelling-group and dwelling-multiple. Consequential drafting will be needed so that existing sub-clause 6, which requires a solid screen fence where development abuts Zones LR or LMR, does not operate between lots within Zone LR.
7. **Community Safety Design Guide.** Insert a requirement equivalent to Clause 5.5.3(1) into the residential provisions, so that subdivision, dwelling-group and dwelling-multiple applications in Zone LR must demonstrate consideration of the Community Safety Design Guide and the consent authority must have regard to it. At present the Guide has no application to residential development in Zone LR, notwithstanding that its residential guidance is the most detailed CPTED direction the Scheme contains.
8. **Orientation.** Amend Clause 5.4.3.3 so that a zero setback to a western boundary in Alice Springs is available only where the application demonstrates a shading or thermal response to that elevation.
9. **Strategic framework testing.** Require the amendment to be assessed against the arid climate, urban heat and water objectives of the Alice Springs Regional Land Use Plan 2016 and the Central Alice Springs Area Plan, and the assessment published, before the Commission reports to the Minister.

We would be glad to speak to this submission at any hearing, and to assist the Commission or the Department with drafting on any of the above.

Owen Kelly

FORMAL SUBMISSION OPPOSING PROPOSED PLANNING SCHEME AMENDMENT

Infill Development and Subdivision in Zone LR (Low Density Residential)

Northern Territory Planning Scheme 2020

To: Northern Territory Planning Commission

Re: Proposed Planning Scheme Amendment – Infill Development and Subdivision in Zone LR

Position: Strong objection – amendment should be rejected in its entirety

1. Introduction

I am writing to strongly oppose the proposed Planning Scheme Amendment to facilitate increased infill development and subdivision within Zone LR (Low Density Residential) throughout the Northern Territory.

I support sensible planning for population growth and recognise the importance of providing appropriate housing choice. However, I do not believe that these objectives should be achieved by substantially increasing development intensity across established low-density residential neighbourhoods.

One of the things that makes the Northern Territory an attractive place to live is the **space, greenery, outdoor lifestyle and privacy** available in its established residential communities.

The character of many Territory suburbs is defined by relatively large residential blocks, established gardens and mature trees, generous separation between homes, quiet streets and access to private outdoor space. These characteristics are particularly valuable in the Territory's climate and form an important part of the lifestyle that attracts people to live and raise families here.

I am concerned that the proposed amendment would progressively erode these characteristics.

A change that allows individual properties to be subdivided may appear relatively minor when considered in isolation. However, if the same development rights are applied across established Zone LR neighbourhoods, the cumulative effect could be a fundamental transformation of those communities.

The result could be smaller lots, more dwellings, more traffic, increased parking pressure, loss of mature vegetation, reduced private open space, greater overlooking and reduced privacy.

I therefore respectfully request that the proposed Planning Scheme Amendment be rejected in its entirety.

2. Protecting what makes Territory neighbourhoods liveable

Planning policy should not focus solely on the number of additional dwellings that can theoretically be accommodated.

It should also consider what makes a neighbourhood desirable and liveable.

Established Territory residential areas provide a combination of:

- generous residential space;
- mature trees and vegetation;
- private gardens;
- shade and natural cooling;
- outdoor living areas;
- privacy between homes;
- natural ventilation;
- relatively quiet streets;
- space for children and families; and
- a strong connection between indoor and outdoor living.

These characteristics are particularly important in the Northern Territory.

The outdoor lifestyle is one of the Territory's greatest assets. Homes and neighbourhoods are designed around outdoor living, gardens, swimming pools, entertaining areas and shaded spaces.

Reducing lot sizes and increasing building intensity places direct pressure on all of these features.

Once mature trees are removed and established blocks are subdivided, the resulting loss of space and vegetation cannot easily be reversed.

Planning policy should therefore protect these characteristics rather than gradually eroding them through incremental development.

3. The proposed amendment represents a fundamental change to Zone LR

Zone LR exists to provide a low-density residential environment.

The proposed reduction of the minimum lot size to approximately **450m²** is a significant departure from the existing 800m² minimum.

A 450m² lot represents only 56.25% of an 800m² lot.

That is not simply a minor technical adjustment.

Combined with greater flexibility for dwelling-group development, dwelling-multiple development and battle-axe subdivision, it creates substantially greater development potential across established neighbourhoods.

The distinction between low-density and higher-density residential zones risks becoming increasingly blurred.

If the Government considers a particular location suitable for higher-density development, the appropriate planning response should be to identify that location through a place-based process and consider whether rezoning to a higher-density residential zone is appropriate.

A blanket change to Zone LR is not an adequate substitute for that process.

4. The cumulative impact of infill is the real issue

The proposal needs to be assessed not just on whether an individual development can comply with planning controls, but on what happens when the development rights are exercised repeatedly across an entire suburb.

For example, if a large number of existing residential properties are subdivided, the cumulative result could include:

- substantially more dwellings;
- smaller private lots;
- increased building footprints;
- more driveways and vehicle access points;
- increased traffic;
- increased on-street parking;
- loss of mature trees;
- reduced landscaping;
- reduced private open space;
- greater overlooking;
- reduced privacy;

- increased noise; and
- a substantial change to the streetscape.

The fact that each individual development may comply with the planning scheme does not mean that the cumulative outcome will be appropriate.

This is one of the fundamental reasons why the proposed amendment should not proceed without comprehensive modelling of the likely cumulative impact.

5. Infrastructure capacity must be established first

The argument that infill development makes better use of existing infrastructure should not be accepted without evidence that the existing infrastructure actually has sufficient capacity.

The Planning Commission's own consultation material identifies concerns regarding:

- water;
- sewer;
- electricity;
- roads;
- drainage;
- parking; and
- other infrastructure.

The Commission's report also identifies concerns regarding ageing infrastructure and limited remaining capacity in some established suburbs.

This is particularly important because the proposed amendment would create development rights that could remain available for decades.

The Government should therefore establish:

How many additional dwellings could potentially be created under the proposed rules, and can the existing infrastructure actually support them?

That assessment should occur before the planning framework is changed.

Existing infrastructure should not automatically be regarded as available capacity.

6. Traffic and parking

More dwellings generally mean more residents, more vehicles and more vehicle movements.

Many established residential streets were designed around their existing low-density development pattern.

Increasing the number of households in those streets could result in:

- increased on-street parking;
- greater congestion;
- more vehicle movements;
- additional driveway crossings;
- reduced pedestrian safety;
- greater pressure on intersections; and
- increased demand for road maintenance.

Battle-axe subdivision and multiple dwellings can further increase vehicle movements while concentrating additional households within streets that were not necessarily designed for that level of intensity.

Traffic and parking impacts should therefore be assessed at a **neighbourhood and network level**, rather than simply through the assessment of individual developments.

7. Loss of greenery and mature vegetation

The greenery of established Territory suburbs is one of their defining characteristics.

Large blocks provide space for mature trees and vegetation that:

- provide shade;
- reduce heat;
- support biodiversity;
- improve visual amenity;
- provide privacy;
- contribute to natural cooling; and
- help manage stormwater.

Smaller lots and greater building coverage create significant pressure to remove existing vegetation.

Planting replacement trees after redevelopment does not provide an equivalent outcome.

A mature tree can take decades to establish.

The planning system should therefore recognise the existing value of mature vegetation rather than treating it as something that can simply be replaced after development.

8. Loss of outdoor lifestyle and private open space

The Territory's climate makes private outdoor space particularly important.

Large yards and gardens provide opportunities for:

- outdoor entertaining;
- children's play;
- swimming pools;
- gardening;
- shaded areas;
- recreation; and
- connection with nature.

Increasing residential density necessarily places pressure on this space.

A smaller lot with a larger building footprint, driveway and other hard surfaces may technically satisfy minimum open-space requirements while providing a very different quality of life.

The question should not simply be whether there is a minimum amount of open space left.

The question should be whether the development continues to provide the **quality of outdoor living that is characteristic of Territory residential communities**.

9. Privacy and amenity

Privacy is another important component of the existing low-density environment.

Generous separation between houses allows residents to use their gardens, pools and outdoor entertaining areas without feeling that they are constantly overlooked by neighbouring properties.

Increasing dwelling density can result in:

- more windows overlooking adjoining properties;
- balconies and elevated outdoor areas;
- outdoor living areas closer to neighbouring homes;
- increased noise;
- increased activity; and
- reduced visual separation.

These impacts are particularly significant where existing residents have purchased their homes in reliance on the established low-density character of the neighbourhood.

10. Neighbourhood character should not be treated as an afterthought

Neighbourhood character is created by the combined effect of:

- lot sizes;
- building separation;
- vegetation;
- gardens;
- setbacks;
- building height;
- streetscape;
- traffic;
- parking; and
- residential density.

Changing one of these characteristics across a large number of properties inevitably affects the others.

A neighbourhood can gradually change without any single development appearing unreasonable.

That is precisely why the cumulative effect must be considered.

The objective should be to preserve the qualities that make established Territory suburbs desirable while allowing additional housing in locations where increased density is genuinely appropriate.

11. A better approach to increasing housing supply

I do not oppose increased housing supply.

I oppose the proposition that established low-density neighbourhoods should all be treated as suitable locations for increased density.

Additional housing should instead be directed towards locations where it can be supported by:

- infrastructure capacity;
- public transport;

- roads;
- schools;
- employment;
- shops and services;
- open space;
- drainage; and
- an appropriate existing built form.

This could include selected activity centres, transport corridors and locations specifically identified through Area Plans.

Where a particular neighbourhood is suitable for higher density, a targeted planning process can determine the appropriate development controls.

This would be a much more considered approach than changing Zone LR across the Territory.

12. Housing growth should not come at the expense of existing residents

There is an important distinction between increasing housing supply and transferring the costs of increased density onto existing residents.

Existing residents should not be expected to accept:

- increased traffic;
- parking congestion;
- loss of mature trees;
- reduced privacy;
- increased noise;
- reduced outdoor space;
- increased stormwater pressure;
- infrastructure constraints; and
- loss of neighbourhood character

simply because additional housing is required somewhere in the Territory.

The benefits and costs of planning reform need to be fairly distributed.

Where additional density is appropriate, it should be planned for locations that can accommodate it.

13. The proposal should not proceed until the outstanding issues are resolved

The Planning Commission's own work has identified many of the concerns raised in this submission, including infrastructure capacity, traffic, parking, landscaping, tree canopy, ventilation, privacy, stormwater and neighbourhood character.

The Commission has also recognised that further consultation and detailed testing are required.

This strongly suggests that the current proposal is not sufficiently resolved to justify a broad statutory change to Zone LR.

The Government should undertake comprehensive assessment before creating additional development rights.

That assessment should include:

1. infrastructure-capacity modelling;
2. traffic and parking modelling;
3. stormwater and drainage analysis;
4. vegetation and tree-canopy assessment;
5. community-facility capacity;
6. modelling of potential additional dwelling numbers;
7. assessment of cumulative neighbourhood impacts; and
8. detailed mapping of areas likely to experience significant change.

14. Requested outcome

For the reasons outlined above, I respectfully request that the Northern Territory Planning Commission and the Minister for Lands, Planning and Environment:

- 1. Reject the proposed Planning Scheme Amendment in its entirety.**
- 2. Retain the existing Zone LR minimum lot size and development-intensity framework.**
- 3. Do not introduce a blanket 450m² minimum lot size throughout Zone LR.**
- 4. Do not introduce Territory-wide provisions facilitating additional dwelling-group, dwelling-multiple or battle-axe development within established Zone LR neighbourhoods.**
- 5. Undertake comprehensive infrastructure, traffic, parking, drainage, environmental and community-facility assessments before considering any future increase in residential density.**
- 6. Identify specific locations where increased housing density is genuinely appropriate based on infrastructure capacity and planning considerations.**

7. Consider targeted rezoning or other place-based planning mechanisms for those locations rather than changing the fundamental character of Zone LR throughout the Territory.

8. Undertake further meaningful consultation with affected communities before any future amendment is progressed.

15. Final statement

The Northern Territory needs to grow, but growth should not mean that every established low-density residential neighbourhood must become progressively more intensive.

The **space, greenery, outdoor lifestyle and privacy** available in established Territory suburbs are valuable community assets.

They contribute to the liveability of the Territory and are part of what makes it an attractive place to live.

Once established residential blocks are repeatedly subdivided, mature vegetation removed and additional dwellings constructed, those characteristics cannot easily be restored.

Good planning should look beyond the number of additional dwellings that can fit on a block.

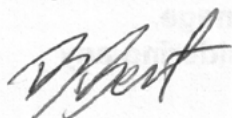
It should consider the type of community that the Territory wants to create and preserve for the next generation.

Housing growth can and should occur, but it should be directed to locations where infrastructure, roads, services and the surrounding built environment can support it.

The solution to housing demand should not be to progressively eliminate the characteristics of low-density neighbourhoods.

For these reasons, I strongly oppose the proposed Planning Scheme Amendment and respectfully request that it be **rejected in its entirety**.

Regards



Brooke Best

FORMAL SUBMISSION OPPOSING PROPOSED PLANNING SCHEME AMENDMENT

Infill Development and Subdivision in Zone LR (Low Density Residential)

Northern Territory Planning Scheme 2020

To: Northern Territory Planning Commission

Re: Proposed Planning Scheme Amendment – Infill Development and Subdivision in Zone LR

Position: Strong objection – amendment should be rejected in its entirety

1. Introduction

I am writing to strongly oppose the proposed Planning Scheme Amendment to facilitate increased infill development and subdivision within Zone LR (Low Density Residential) throughout the Northern Territory.

I support sensible planning for population growth and recognise the importance of providing appropriate housing choice. However, I do not believe that these objectives should be achieved by substantially increasing development intensity across established low-density residential neighbourhoods.

One of the things that makes the Northern Territory an attractive place to live is the **space, greenery, outdoor lifestyle and privacy** available in its established residential communities.

The character of many Territory suburbs is defined by relatively large residential blocks, established gardens and mature trees, generous separation between homes, quiet streets and access to private outdoor space. These characteristics are particularly valuable in the Territory's climate and form an important part of the lifestyle that attracts people to live and raise families here.

I am concerned that the proposed amendment would progressively erode these characteristics.

A change that allows individual properties to be subdivided may appear relatively minor when considered in isolation. However, if the same development rights are applied across established Zone LR neighbourhoods, the cumulative effect could be a fundamental transformation of those communities.

The result could be smaller lots, more dwellings, more traffic, increased parking pressure, loss of mature vegetation, reduced private open space, greater overlooking and reduced privacy.

I therefore respectfully request that the proposed Planning Scheme Amendment be rejected in its entirety.

2. Protecting what makes Territory neighbourhoods liveable

Planning policy should not focus solely on the number of additional dwellings that can theoretically be accommodated.

It should also consider what makes a neighbourhood desirable and liveable.

Established Territory residential areas provide a combination of:

- generous residential space;
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- private gardens;
- shade and natural cooling;
- outdoor living areas;
- privacy between homes;
- natural ventilation;
- relatively quiet streets;
- space for children and families; and
- a strong connection between indoor and outdoor living.

These characteristics are particularly important in the Northern Territory.

The outdoor lifestyle is one of the Territory's greatest assets. Homes and neighbourhoods are designed around outdoor living, gardens, swimming pools, entertaining areas and shaded spaces.

Reducing lot sizes and increasing building intensity places direct pressure on all of these features.

Once mature trees are removed and established blocks are subdivided, the resulting loss of space and vegetation cannot easily be reversed.

Planning policy should therefore protect these characteristics rather than gradually eroding them through incremental development.

3. The proposed amendment represents a fundamental change to Zone LR

Zone LR exists to provide a low-density residential environment.

The proposed reduction of the minimum lot size to approximately **450m²** is a significant departure from the existing 800m² minimum.

A 450m² lot represents only 56.25% of an 800m² lot.

That is not simply a minor technical adjustment.

Combined with greater flexibility for dwelling-group development, dwelling-multiple development and battle-axe subdivision, it creates substantially greater development potential across established neighbourhoods.

The distinction between low-density and higher-density residential zones risks becoming increasingly blurred.

If the Government considers a particular location suitable for higher-density development, the appropriate planning response should be to identify that location through a place-based process and consider whether rezoning to a higher-density residential zone is appropriate.

A blanket change to Zone LR is not an adequate substitute for that process.

4. The cumulative impact of infill is the real issue

The proposal needs to be assessed not just on whether an individual development can comply with planning controls, but on what happens when the development rights are exercised repeatedly across an entire suburb.

For example, if a large number of existing residential properties are subdivided, the cumulative result could include:

- substantially more dwellings;
- smaller private lots;
- increased building footprints;
- more driveways and vehicle access points;
- increased traffic;
- increased on-street parking;
- loss of mature trees;
- reduced landscaping;
- reduced private open space;
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- increased noise; and
- a substantial change to the streetscape.

The fact that each individual development may comply with the planning scheme does not mean that the cumulative outcome will be appropriate.

This is one of the fundamental reasons why the proposed amendment should not proceed without comprehensive modelling of the likely cumulative impact.

5. Infrastructure capacity must be established first

The argument that infill development makes better use of existing infrastructure should not be accepted without evidence that the existing infrastructure actually has sufficient capacity.

The Planning Commission's own consultation material identifies concerns regarding:

- water;
- sewer;
- electricity;
- roads;
- drainage;
- parking; and
- other infrastructure.

The Commission's report also identifies concerns regarding ageing infrastructure and limited remaining capacity in some established suburbs.

This is particularly important because the proposed amendment would create development rights that could remain available for decades.

The Government should therefore establish:

How many additional dwellings could potentially be created under the proposed rules, and can the existing infrastructure actually support them?

That assessment should occur before the planning framework is changed.

Existing infrastructure should not automatically be regarded as available capacity.

6. Traffic and parking

More dwellings generally mean more residents, more vehicles and more vehicle movements.

Many established residential streets were designed around their existing low-density development pattern.

Increasing the number of households in those streets could result in:

- increased on-street parking;
- greater congestion;
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- additional driveway crossings;
- reduced pedestrian safety;
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- increased demand for road maintenance.

Battle-axe subdivision and multiple dwellings can further increase vehicle movements while concentrating additional households within streets that were not necessarily designed for that level of intensity.

Traffic and parking impacts should therefore be assessed at a **neighbourhood and network level**, rather than simply through the assessment of individual developments.

7. Loss of greenery and mature vegetation

The greenery of established Territory suburbs is one of their defining characteristics.

Large blocks provide space for mature trees and vegetation that:

- provide shade;
- reduce heat;
- support biodiversity;
- improve visual amenity;
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- help manage stormwater.

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A mature tree can take decades to establish.

The planning system should therefore recognise the existing value of mature vegetation rather than treating it as something that can simply be replaced after development.

8. Loss of outdoor lifestyle and private open space

The Territory's climate makes private outdoor space particularly important.

Large yards and gardens provide opportunities for:

- outdoor entertaining;
- children's play;
- swimming pools;
- gardening;
- shaded areas;
- recreation; and
- connection with nature.

Increasing residential density necessarily places pressure on this space.

A smaller lot with a larger building footprint, driveway and other hard surfaces may technically satisfy minimum open-space requirements while providing a very different quality of life.

The question should not simply be whether there is a minimum amount of open space left.

The question should be whether the development continues to provide the **quality of outdoor living that is characteristic of Territory residential communities**.

9. Privacy and amenity

Privacy is another important component of the existing low-density environment.

Generous separation between houses allows residents to use their gardens, pools and outdoor entertaining areas without feeling that they are constantly overlooked by neighbouring properties.

Increasing dwelling density can result in:

- more windows overlooking adjoining properties;
- balconies and elevated outdoor areas;
- outdoor living areas closer to neighbouring homes;
- increased noise;
- increased activity; and
- reduced visual separation.

These impacts are particularly significant where existing residents have purchased their homes in reliance on the established low-density character of the neighbourhood.

10. Neighbourhood character should not be treated as an afterthought

Neighbourhood character is created by the combined effect of:

- lot sizes;
- building separation;
- vegetation;
- gardens;
- setbacks;
- building height;
- streetscape;
- traffic;
- parking; and
- residential density.

Changing one of these characteristics across a large number of properties inevitably affects the others.

A neighbourhood can gradually change without any single development appearing unreasonable.

That is precisely why the cumulative effect must be considered.

The objective should be to preserve the qualities that make established Territory suburbs desirable while allowing additional housing in locations where increased density is genuinely appropriate.

11. A better approach to increasing housing supply

I do not oppose increased housing supply.

I oppose the proposition that established low-density neighbourhoods should all be treated as suitable locations for increased density.

Additional housing should instead be directed towards locations where it can be supported by:

- infrastructure capacity;
- public transport;

- roads;
- schools;
- employment;
- shops and services;
- open space;
- drainage; and
- an appropriate existing built form.

This could include selected activity centres, transport corridors and locations specifically identified through Area Plans.

Where a particular neighbourhood is suitable for higher density, a targeted planning process can determine the appropriate development controls.

This would be a much more considered approach than changing Zone LR across the Territory.

12. Housing growth should not come at the expense of existing residents

There is an important distinction between increasing housing supply and transferring the costs of increased density onto existing residents.

Existing residents should not be expected to accept:

- increased traffic;
- parking congestion;
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- increased noise;
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- increased stormwater pressure;
- infrastructure constraints; and
- loss of neighbourhood character

simply because additional housing is required somewhere in the Territory.

The benefits and costs of planning reform need to be fairly distributed.

Where additional density is appropriate, it should be planned for locations that can accommodate it.

13. The proposal should not proceed until the outstanding issues are resolved

The Planning Commission's own work has identified many of the concerns raised in this submission, including infrastructure capacity, traffic, parking, landscaping, tree canopy, ventilation, privacy, stormwater and neighbourhood character.

The Commission has also recognised that further consultation and detailed testing are required.

This strongly suggests that the current proposal is not sufficiently resolved to justify a broad statutory change to Zone LR.

The Government should undertake comprehensive assessment before creating additional development rights.

That assessment should include:

1. infrastructure-capacity modelling;
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3. stormwater and drainage analysis;
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8. detailed mapping of areas likely to experience significant change.

14. Requested outcome

For the reasons outlined above, I respectfully request that the Northern Territory Planning Commission and the Minister for Lands, Planning and Environment:

- 1. Reject the proposed Planning Scheme Amendment in its entirety.**
- 2. Retain the existing Zone LR minimum lot size and development-intensity framework.**
- 3. Do not introduce a blanket 450m² minimum lot size throughout Zone LR.**
- 4. Do not introduce Territory-wide provisions facilitating additional dwelling-group, dwelling-multiple or battle-axe development within established Zone LR neighbourhoods.**
- 5. Undertake comprehensive infrastructure, traffic, parking, drainage, environmental and community-facility assessments before considering any future increase in residential density.**
- 6. Identify specific locations where increased housing density is genuinely appropriate based on infrastructure capacity and planning considerations.**

7. Consider targeted rezoning or other place-based planning mechanisms for those locations rather than changing the fundamental character of Zone LR throughout the Territory.

8. Undertake further meaningful consultation with affected communities before any future amendment is progressed.

15. Final statement

The Northern Territory needs to grow, but growth should not mean that every established low-density residential neighbourhood must become progressively more intensive.

The **space, greenery, outdoor lifestyle and privacy** available in established Territory suburbs are valuable community assets.

They contribute to the liveability of the Territory and are part of what makes it an attractive place to live.

Once established residential blocks are repeatedly subdivided, mature vegetation removed and additional dwellings constructed, those characteristics cannot easily be restored.

Good planning should look beyond the number of additional dwellings that can fit on a block.

It should consider the type of community that the Territory wants to create and preserve for the next generation.

Housing growth can and should occur, but it should be directed to locations where infrastructure, roads, services and the surrounding built environment can support it.

The solution to housing demand should not be to progressively eliminate the characteristics of low-density neighbourhoods.

For these reasons, I strongly oppose the proposed Planning Scheme Amendment and respectfully request that it be **rejected in its entirety**.

Regards



Shaun Best



Dear NT Government

I object to this change to the Planning Scheme and the way it is being implemented with no associated controls or conditions. This amendment will change the character of our suburbs forever and the NT Government has not genuinely consulted with the residents that will be impacted.

I am not against infill and densification of our suburbs as a way to reduce urban sprawl and increasing population density which can often justify better services such as public transport and better public infrastructure. The ad hoc way this change is being implemented however does not ensure the infrastructure and services will keep up with the densification and only put strain on these services and the local Council.

It is irresponsible and short sighted to change the Planning Scheme without any controls or conditions to prevent the subdivision of lots whereby we will lose trees, canopy cover, garden space around houses and room to allow breezes etc. This infill threatens our ability to mitigate the urban heat island effect in our suburbs and the climate resilience of Darwin. We may be able to fit more people in but what is the point if nobody wants to live in Darwin because its too hot and getting hotter with climate change and the provision of infrastructure servicing these suburbs cant keep up e.g. sewage, roads, public transport, schools.

This ad hoc change to the Planning Scheme threatens the liveability of our suburbs and the future population growth of Darwin given it will become a less desirable place to live.

Before implementing this poorly considered amendment the NT Government needs to genuinely consult with the impacted communities and also do some serious and carefully considered planning for the future to ensure the Planning Scheme enables Darwin to improve in liveability and mitigate the urban heat island effect and climate change.

Emma Smith



Letter of opposition to Proposed Planning changes

I write this in opposition to the proposed amendment to the Planning Scheme to allow for smaller blocks in a range of suburbs that currently have large blocks and are zoned LR.

All persuasions of NT Governments talk about maintaining and improving live-ability in the NT. We have a problem attracting and maintaining people, staff, workers. Maintained and improved live-ability is very important to attract people and business to move to, invest in and stay in the NT. This sort of proposal has been raised previously (Henderson Govt for example) and been unsuccessful due to the fact that it degrades liveability and many other values that make Darwin an attractive place to live.

I personally live in Fannie Bay and have intentionally purchased a large house on a large block and VERY IMPORTANTLY surrounded by large blocks. This investment was underpinned by the Low Density Residential Zoning.

The current LR Zone does not allow for a diverse mix of housing and accommodation as that results in a degraded suburb and living environment for those who wish for, require and can afford to invest in the LR zone as it stands.

All cities need areas of housing diversity and this includes areas of premium housing and living opportunities so as to attract and maintain people who can afford that style of living and will not accept lower quality housing opportunities. These include senior public servants and most importantly business people who bring money and invest in the Territory. Creating a monoculture type city absolutely has the opposite impact.

A reason given for the changes in the planning act is;

These provisions constrain development within existing residential areas by limiting the range of housing outcomes that can be achieved, making it difficult to respond to changing household needs, accommodate smaller households, or provide more and alternative housing forms within well-established suburbs.

Is this not why we have planning regulations? For the constraint of development that does not suite the area. To maintain the character of the suburb and the values that attracted its residents in the first place.

The prospect of having my neighbours subdivide goes against the whole reason I invested into this part of Darwin. I chose Fannie Bay and I remain operating my business in Darwin because the area I live in is zoned single dwelling and is all large blocks and I love that.

All of my new neighbours over the past 9 years have been young families, mostly of business owners, who have invested in this area because of the values that it currently possesses, large spacious blocks to bring up a Territory family in a tropical house and a nice neighbourhood.

The destruction of this scenario by infill will severely degrade the quality of the liveability of the suburb and reduce values.

Darwin is getting hotter. Large blocks with shade trees, airflow and tropical houses allows for a style of living that doesn't not require constant air conditioning. Infill adds to the urban heat sink effect.

I recommend that the Planning Commission put effort into the Protection of the Mature Tree Canopy. Infill on existing lots leads to the loss of mature shade trees, directly worsening the urban heat island effect and reducing quality of living.

The Minister mentioned in his release that *if you don't want to subdivide you don't have to....* Such a statement really misses the entire point – if your neighbour subdivides, your lifestyle and property value is degraded. They will most likely build a 2 storey block wall 1.5 metres from your boundary. It will be covered in the heat and noise producing motors of air conditioners, be a heat sink and reduce or completely block any air flow. All trees will have been removed, privacy reduced and you will be living immediately next door to a construction site for the majority of a year.

The potential of this is exacerbated by the removal from the planning documents of the sentence; “Potential land use conflicts are minimised by taking account of the visual and acoustic privacy of residents”. As well as the removal of the need for “On site Parking” which encourages parking on the road – degrading lifestyles of neighbours.

A number of aging houses in this part of Fannie Bay have been replaced with completely new dwellings over the past few years and many houses undergo substantial renovations. These very expensive works are not driven by greed, economics or investment in anything other than the desirability of the location to live in and the style of living that the current zoning allows for. These substantial investments by people that can afford it will not continue if the neighbourhood changes to a higher density and schizophrenic suburb that has lost its appeal, character and value.

The Commission's review identified that the existing Zone LR provisions may reduce opportunities for infill development, particularly in established suburbs. Feedback from consultation indicated there is some community support for increased housing diversity, provided new development is appropriately designed, maintains neighbourhood character, and includes suitable planning controls

Infill cannot allow for the maintenance of community character and the values that large blocks in LR zones allow for.

The Planning Commission consultation report suggests that - Design, Amenity, and Environment are important. That “Good design is essential, including privacy, landscaping, shade, airflow, and community amenity”. This is in conflict with the proposed changes and there are no or very few controls over this – building a new 2 storey block house 1.5 metres from a boundary is in conflict with privacy, landscaping, shade, airflow, and community amenity and the planning commission has little influence to prevent this from happening once the flood gates are opened.

I call for the Planning Commission to develop targeted design controls, including clear, enforceable controls on side-boundary setbacks, vehicle access, on-site landscaping, privacy, and stormwater management so that if this ridiculous proposal is approved that the outcome respects adjoining homes and the established streetscape and has a lesser detrimental impact on neighbours.

Parap and to a lesser extent, Fannie Bay are currently examples of good planning, where there is higher density close to the commercial centres, but low density away from them. This planning of density and avoidance of random density changes encourages the economic sustainability of

the shops and businesses and makes public transport and other community services more effective and efficient for the benefit of the community.

It also allows for the correct provision and costing of services to the higher density dwellings.

I implore the Planning Commission to build on this sensible planning involving directing density to appropriate areas. Higher density belongs along major arterial corridors and commercial centre's (where infrastructure already exists) rather than deep within quiet residential streets.

This action does not in any way go towards solving our housing shortage. A housing shortage is solved by large scale residential developments like Northcrest, Lee Point and the various new estates planned around Palmerston and beyond. The NTG should be focussing on better supporting these and getting them up and running and actually solve the problem rather than putting in band aid solutions that degrade our city and detract from its live-ability.

The proposed changes would fundamentally change the character and desirability of Darwin's established suburbs in ways that cannot be reversed once implemented.

The loudest voices in support of such proposals are often driven by greed based on the fact that housing has become one of the major recipients of investment in this country which has resulted in over inflated property prices and partly responsible for the inability for first home buyers to enter the market.

I am concerned that any opposition to this proposal will simply be ignored like the recent substantial community opposition to the greed driven EDP subdivision of a tiny sliver of 380m² off the back of a house in Scott St Fannie Bay. I will add that the signing of EDP's is the acceptance of a failed planning scheme where ways around it are sought and happily granted by the Minister, to the dismay of the ignored community.



Ray Hall

Subject:

FW: submission

From: [REDACTED]

Sent: Sunday, 9 August 2026 8:51 PM

To: Das NTG <Das.NTG@nt.gov.au>

Subject: submission

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom this concerns,

I wish to provide this as my submission to state that I strongly reject the idea of subdividing existing properties throughout suburbs like Brinkin, Nakara, and Nightcliff into smaller parcels.

Governments and developers find it much cheaper and easier to bulldoze trees at Lee Point or split an old 800-square-metre block in the northern suburbs than to fix the corporate leasing system problem.

Using finite local housing stock (often empty units in the city) to serve as empty, part-time holding bays for multinational corporations and federal agencies (Defence and Mining Fife's) is a massive structural planning failure. It is the local community that pay the price through lost backyards and flattened bushland.

It is ridiculous to devalue areas such as Brinkin, Nightcliff and Nakara and increase already existing pressures such as erosion of the cliff edges due to increased population usage, increased urban runoff into our water ways (have you seen Adelaide's water quality?), concrete heaters like driveways and block housing instead of trees, traffic congestion, increased destruction of forest habitat for wildlife through increased population use, and completely unmanaged fire use that uses bonfire budget like approaches to protect increasing non environmentally sustainable housing, thanks to chronically underfunded and understaffed ranger groups.

Where once this city had a unique and enviable connection to nature, actual design skill and amazing open green space 'freeness' to living, it now has one of increasing cement block cookie cutter houses with ridiculous amount of air cons and depressing generic mediocre ground hog day like nothingness.

Casuarina Coastal Reserve is systematically being devalued and destroyed, eventually the complicit councils and politicians will proclaim once they have burnt it enough that nothing is there to protect so 'let's develop it'. This is outrageous planning from people who need to actually care and say something. We can earn a living, bring our family up here and surely still fight for quality of life and environmental protection? Or perhaps we just keep the bar low and say it's too hard or 'I'm not paid for that'? How depressing.

There are so many ways a city can be alive, sustainable, shared, prosperous, environmentally friendly, culturally at the forefront, attractive to families and the young and maximised to its modest but exquisite potential, incentivising the protection of nature and lifestyle, but yet Darwin is digging itself down into the

dust in a desperate reactive economic and sadly predictable pattern of bad planning and over welcoming industry that simply plunders and leaves.

Regards
Ms Bowden

Subject:

FW: Planning Scheme Amendment to facilitate smaller blocks in Zone LR - PA2026/0205

From: Anthony Kerr [REDACTED]**Sent:** Sunday, 9 August 2026 6:39 PM**To:** Das NTG <Das.NTG@nt.gov.au>**Subject:** Planning Scheme Amendment to facilitate smaller blocks in Zone LR - PA2026/0205

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I have received information about proposed changes to in Zone LR - PA12026/0205.
I live in Claymore Circuit, Brinkin and I am very concerned.

Brinkin is a beautiful suburb. I have lived there for many years and enjoy the serenity and the neighbourhood. There is quite a bonded community here. Please do not proceed with these proposed planning changes as they would significantly change the nature of this unique area.

A building is being constructed in Claymore circuit that already is suspiciously unlike a normal residential footprint. There was significant concerns raised about this at the time, but it seemed to fall on deaf ears.

We love Brinkin the way it is, do not change it.

Kindest Regards,

Anthony Kerr

[REDACTED]

Note: I often respond to emails outside normal work hours. Please do not feel obliged to respond immediately.

Subject:

FW: Re PA2026/0205 Planning Scheme Amendment

From: Judith Durnford [REDACTED]
Sent: Tuesday, 11 August 2026 10:49 AM
To: Das NTG <Das.NTG@nt.gov.au>
Subject: Re PA2026/0205 Planning Scheme Amendment

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Judith Durnford
[REDACTED]
[REDACTED]

Re PA2026/0205 Planning Scheme Amendment

I refer to the Town of Nightcliff that falls within this proposed amendment.

The division of a substantial number of residential allotments within this area would be catastrophic to the current ambience and facilities that residents are currently able to access.

It would be detrimental in a wide variety of circumstances:

- create issues with overcrowding regarding insufficient parking
- higher density living equates to additional traffic
- higher density living equates to structures that must use air conditioning: housing designs can no longer be built to open freely to outside spaces
- substantial loss of adequate green spaces thereby the current cooler environment for housing is lost
- increased residential energy costs due to overcrowding of structures
- current walkways/paths along the foreshore would be insufficient
- urban habitats for local native animals and birds diminished /depleted

I live in a small cul-de-sac that forms part of this proposal. Rapid Creek has a substantial number of these small cul-de-sacs. If all residents were to half there allotments, parking and movement of traffic would become a severe issue, neighbourhood noise would escalate and the ample green environment would be depleted in an already hot tropical zone. City of Darwin Council 'Gardens for Wildlife' program becomes a farce as wildlife that already struggle are further limited further. Sadly, planning is always running behind necessary infrastructure.

signed

Judith Durnford

Judith Durnford

11 August 2026

Northern Territory Department of Lands, Planning and Environment
GPO Box 1680
Darwin NT 0800

Dear Sir / Madam

RE: Submission on PA2026/0205

Proposed Planning Scheme Amendment to Facilitate Infill Development and Subdivision in Zone LR

Cunnington Rosse Town Planning and Consulting (CRTPC) welcome this opportunity to provide a submission in response to PA2026/0205, being a proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential). CRTPC have extensive experience in the assessment and facilitation of residential development and subdivision in the Northern Territory and are well placed to provide feedback on the proposed amendment, particularly as it affects development assessment and determinations of the Development Consent Authority. It is in this context that this feedback is provided.

Whilst the fundamental objectives behind the proposed amendments are supported, CRTPC holds some reservation on the capacity of service infrastructure to support increased infill development and, critically, ensuring that efficient processes are implemented to identify potential capacity issues when undertaking due diligence. Whilst pre-lodgement processes are currently available, these processes provide limited opportunity for feedback from external service authorities or are unsuited to smaller infill development applications (e.g. Development Assessment Forums). Direct (pre-application) approaches to service authorities, particularly regarding the power, water and sewerage infrastructure capacity and connections, can incur significant time delays, and feedback can be deferred to formal application and exhibition processes.

Accordingly, it is recommended that a formal pre-lodgement process be established through Governments' Development Applications Online (DAO) system, to facilitate early assessment of infrastructure capacity for proposed subdivisions. As part of this process, preliminary advice should be formally sought from the Power and Water Corporation (PWC) regarding the capacity of existing power, water and sewerage networks to service the intended development. This early engagement would help identify network constraints, required upgrades or other infrastructure limitations before significant resources are committed to the development and/or subdivision applications. In particular, it would provide proponents with greater visibility of infrastructure requirements that

may result in substantial or potentially prohibitive development costs, allowing these matters to be considered at an early stage of project feasibility and design prior to formal application lodgement.

In addition to the above, the following comments are provided on specific wording elements within the proposed amendment:

- **Amendment to Clause 5.4.3.3(2) – Reduced Setbacks for Dwellings-Single.** The proposed amendment to **Clause 5.4.3.3** comprises the insertion of subclause 2 stating that “this clause does not apply to battle-axe lots.” The Explanatory Document accompanying the Planning Scheme Amendment clarifies this amendment, noting that *“they (battle-axe lots) will not be eligible for reduced setback provisions that currently apply to smaller lots in the NT. This ensures that development maintains appropriate spacing and amenity outcomes.”*

This approach, and exemption, is logical when applied to infill subdivision given the high likelihood that infill lots will be adjacent larger, more traditional development, whereby a reliance on the standard setbacks under **Clause 5.4.3** is likely to be critical to ensuring appropriate spacing and amenity outcomes. The exemption, however, is less suited to battle-axe lots created as part of a greenfield subdivision, with a much higher likelihood of adjacent smaller lots and increased reliance on reduced setbacks per **Clause 5.4.3.3**. Whilst the Planning Scheme discourages battle-axe lots in greenfield subdivision (both in its current form or via the proposed amendments), the consent authority retains discretion to approve battle-axe lots (via proposed **Clause 6.2.1(5)**) and there are recent examples thereof (e.g. the Holtze stage 1 land release). Consideration should be given to removing the battle-axe lot exemption in **Clause 5.4.3.3** where lots are created as part of a greenfield subdivision (for example in greenfield areas identified for compact urban growth).

- **Amendment to Clause 6.2.1(8) – lot Size and Configuration for Subdivision in Zones LR, LMR, MR and HR.** The proposed amendment seeks to facilitate battle-axe lots in certain circumstances, specifically that *“battle-axe lots are to be avoided unless located in Zone LR and:*

*a) The configuration is necessary due to **site irregularity**; and*

b) The configuration enables the retention of an existing dwelling.”

What constitutes “site irregularity” under point a) is not defined, and the purpose and administration clauses do not clarify or expand on the application of the requirement. To limit ambiguity to practitioners, landowners, community and consent authority’s, further clarification or rewording should be considered.

- **Amendment to Clause 6.2.1(Table A) – lot Size and Configuration for Subdivision in Zones LR, LMR, MR and HR.** Proposed amendments to Table A to **Clause 6.2.1** apply a minimum lot size of “450m² (excluding any battle-axe lot access strip)” for subdivision in Zone LR. What constitutes the “lot access strip” is not specifically defined in the proposed amendment to **Schedule 2.2**, and **Clause 6.2.1** does not provide further guidance regarding the determination of a “lot access strip.” This is likely to be a straightforward determination where battle-axe lots are regular with an access strip of regular width. The proposed wording however allows ambiguity where an access strip may be narrower at the site frontage, and widen towards the main lot area, e.g. to provide additional area for landscaping, private open space or car parking. Such an area, being in addition to that required to accommodate a driveway, would reasonably contribute to achieving the minimum lot size.
- **Amendment to Clause 6.2.1(Table B) – lot Size and Configuration for Subdivision in Zones LR, LMR, MR and HR.** The proposed amendment to Table B to remove the minimum 17m x 17m building envelope requirement for lots 600m² or greater is supported. The 17 metre minimum building envelope requirement (which effectively dictates a minimum lot width of at least 20 metres) is not suitable for modern greenfield subdivision, where lot typology’s between 600m² and 800m² generally adopt frontages between 16 and 18 metres.

I welcome any opportunity to further expand or clarify any of submissions made herein, including at any public hearing conducted by the Northern Territory Planning Commission on behalf of the Minister for Lands, Planning and Environment. Please do not hesitate to contact the undersigned with any queries regarding this matter.



Brad Cunningham

Cunnington Rosse Town Planning and Consulting

I support this proposal, and suggest that block sizes be allowed to go to 400sqm, and allowed to be zoned Mr more easily.

Large blocks with unused space, especially on main roads are an unutilised resource in a time when homes are becoming an issue.

Thankyou
David Ronald

Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR

RE: NOTICE OF OBJECTION – Development Application for Proposed Battleaxe Blocks at the Northern End of Zeil Street, Alice Springs (Adjacent to Lot 06913 / Lot 0860)

To the Chairperson and Members of the Development Consent Authority,

I am writing to formally lodge my objection to the proposed development of battleaxe blocks at the northern end of Zeil Street, bordering the Alice Springs Desert Park area. As a resident/property owner in the immediate vicinity, I have severe concerns regarding the suitability of this proposal. The development introduces unacceptable structural, environmental, and safety risks to the local environment and the existing neighbourhood. As per map below.

I request that the Development Consent Authority (DCA) refuse a development permit for this application based on the following specific planning and environmental grounds:

1. Geotechnical and Structural Risks to Existing Properties

The proposed site consists of steep, rocky outcrops that form part of the delicate local ridge line. Constructing multi-story "turret blocks" on this terrain will require significant sub-surface engineering.

- Heavy excavation, rock breaking, or blasting on these outcrops poses an immediate threat of vibration-induced structural damage, shifting, and cracking to the foundations of existing homes on Zeil Street.
- The application fails to provide a comprehensive geotechnical assessment or an independent vibration management plan that guarantees the physical integrity of established adjacent properties.

2. Inadequate Road Access and Destructive Terrain Alteration

There is currently no viable, safe vehicle access to the peak face of this rocky outcrop.

- To establish road access capable of servicing heavy construction machinery and ongoing residential traffic, the developer would be forced to cut severely into the peak face or excessively build up the rocky terrain.
- Such major civil earthworks will permanently scar a prominent natural landscape feature, destabilise the hillside, accelerate topsoil erosion, and drastically alter natural stormwater runoff paths, risking severe downslope flooding toward existing Zeil Street properties.

3. Destruction of High-Value Native Flora (Mature Corkwood Trees)

The targeted development area contains an established stand of mature native Corkwood trees (*Hakea suberea*), with many individual specimens estimated to be over 40 years old, alongside a diverse community of endemic Central Australian flora.

- This rocky outcrop and foothills ecosystem supports iconic, slow-growing species such as the Ghost Gum (*Corymbia aparrerinja*), Mulga (*Acacia*) scrub, resilient Emu Bushes (*Eremophila*), Wild Fig (*Ficus brachypoda*), and specialized spinifex grass systems that are highly adapted to this specific terrain.

Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR

- In our arid environment, these slow-growing trees and specialized desert plants are invaluable ecological assets that provide habitat, stabilize the rocky soil to prevent erosion, and form the distinct visual character of the Alice Springs landscape backdrop.
- Clearing these species represents an irreversible loss of localized biodiversity and indigenous botanical heritage that cannot be replaced or offset by standard residential landscaping

4. Severe Disruption to an Essential Wildlife Corridor

The proposed site acts as a critical, uninhibited wildlife corridor connecting crown land across Larapinta Drive directly to the Alice Springs Desert Park walking trail network.

- Native animals regularly utilize this specific tract of land to move safely through the landscape.
- Placing dense residential blocks directly in this path will sever this migratory corridor, forcing wildlife into dangerous interactions with suburban traffic and disrupting the broader ecosystem of the adjacent Desert Park.

5. Escalation of Wildfire Risk via Fire Break Removal

The parcel of land in question currently serves as a vital, operational fire break zone protecting the existing homes at the northern end of Zeil Street from wilderness fires.

- Replacing this open buffer zone with high-density residential structures removes a crucial line of defence against bushfires.
- This significantly escalates the real-world vulnerability of both existing properties and future residents to wildfire hazards, running entirely contrary to safe planning practices for urban-bushland interfaces in Central Australia.

6. Failure to Account for Native Title Rights and Sacred Site Protection

The proposed development site immediately borders the Alice Springs Desert Park, an area holding profound cultural, spiritual, and historical significance for the Arrernte people, who are the Traditional Owners (*Apmereke-artweye*) of *Mparntwe* (Alice Springs).

- The land in this specific precinct forms part of vital landscape lineages, including the Wild Dog (*Akngwelye*) and Caterpillar (*Yeperenye/Artnwere*) dreaming stories (*Altyerre*). Native Title rights and interests are recognised across Alice Springs and are represented by the Lhere Artepe Aboriginal Corporation.
- Any destructive modification of these rocky outcroppings risks damaging unrecorded sacred sites or violating spiritual landscape corridors protected under the *Northern Territory Aboriginal Sacred Sites Act 1989*.
- The application does not demonstrate comprehensive consultation with Traditional Owners or provide an Authority Certificate issued by the Aboriginal Areas Protection Authority (AAPA) to clear and excavate this specific hillside terrain
-

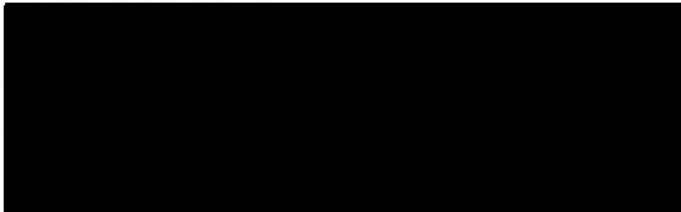
Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR

Conclusion and Request for Hearing

For the reasons detailed above, the proposal represents an overdevelopment of a highly sensitive, physically constrained landscape that cannot safely support this type of density or infrastructure. I urge the Development Consent Authority to refuse this application in its entirety.



K Paice-Brown



We are writing to provide feedback on the proposal to amend the zoning LR laws in Nightcliff, Rapid Creek, Millner and Coconut Grove. We strongly oppose these changes for multiple reasons.

1) Nightcliff, Rapid Creek and the surrounding suburbs represent the best of the Territory lifestyle: large blocks that allow for cooling breezes, large, shady trees, and beautiful, tropical gardens. There is so much diversity in houses, block sizes, gardens and people. We live close enough to establish strong and connected communities and provide services efficiently and but far enough apart to have privacy. The relaxed, outdoor lifestyle that thrives in this environment is what makes the Territory so special.

2) Climate change is real and is a significant threat to NT residents as well as everyone else in the world. Reducing block sizes will accelerate climate change in a number of ways:

- Smaller block sizes will reduce the amount of space available for greenery.
- Cooling breezes are blocked by houses.
- These changes directly increase temperatures and reduce reabsorption of CO2 by plants.
- Hotter temperatures mean increased reliance on air conditioning and, therefore, higher demand for electricity.
- In the NT, this means burning more gas, releasing more CO2, and accelerating climate change.

Darwin is already heading to be an unliveable city due to heat – why worsen this trend by increasing the density and reducing greenery?

3) Big blocks promote family life and encourage families to move to and stay in Darwin. They allow room for a pool, a yard for the kids to play in, and space to store boats, campers and other gear that allow families to access the wealth of the Territory's natural beauty. Smaller blocks do not allow for these "toys" and trap people inside.

4) Increasing the number of residents in the area will increase pressure on services, which are already stretched.

5) There are already areas in these suburbs that are zoned as low medium and medium density. These areas should be optimised before adding any more blocks to higher density zoning.

We strongly oppose this proposition as it is a threat to our beautiful Territory home and lifestyle.

Sincerely

The image shows two handwritten signatures in black ink. The first signature is 'Sara Martin' and the second is 'Phillip Brownscombe'. Both are written in a cursive, flowing style.

Dr Sara Martin and Dr Phillip Brownscombe





To whom it may concern,

I am categorically against this plan for the following reasons:

- part of the attraction to living in this suburb is the large blocks that means you are not living on top of each other and too close to your neighbours
- it would encourage investors to buy blocks to knock down houses and subdivide, we shouldn't be knocking down existing perfectly functioning houses to build more houses, our world already has a lack of resources without wasting them building houses we already have.
- the newer suburbs being built around Darwin are environmental disasters, everyone is packed in so close, there is so much housing and concrete, they are far hotter than the older bigger Darwin suburbs. With climate change becoming more of an issue, cutting down more trees and gardens to build houses is not what we should be doing, we should be encouraging more green suburbs.
- in Darwin we are losing more and more of our wildlife habitats and corridors, large yards are important in creating habitat and corridors for Darwin's wildlife.

I call that this plan not go ahead.

Regards

Angela Salamito



Paul Clissold & Bec Clissold

Homeowners and residents

[REDACTED]

Nightcliff NT 0810

15 August 2026

NT Planning Commission

GPO Box 1680

Darwin NT 0801

Re: Submission - Proposed Planning Scheme Amendment: Infill Development and Subdivision in Zone LR

We are homeowners and residents of Bougainvillea Street, Nightcliff. We are writing to object to the proposed changes to the NT Planning Scheme affecting Low Density Residential (Zone LR) land in our area.

We recognise that Darwin needs additional housing and that appropriately planned infill development has a role to play in meeting that need. However, we do not support broad changes that would facilitate substantially greater density and subdivision throughout established residential areas such as Nightcliff.

Nightcliff already accommodates significant residential density

Nightcliff is already considerably more densely developed than many suburban areas of Darwin, with a mixture of detached houses, townhouses, units and apartment developments.

As residents of Bougainvillea Street, we already experience the effects of this density. There is substantial traffic through our street and noticeable pressure on local roads, parking and other amenities.

Further intensification should therefore not be considered simply in terms of how many additional dwellings can physically be accommodated on existing residential land. It should consider whether the surrounding streets, drainage, infrastructure, services and public spaces can sustainably accommodate the cumulative increase in population and development.

Loss of trees and tropical character

We are particularly concerned about the potential loss of mature trees, vegetation and urban canopy that would accompany widespread subdivision of existing residential lots.

Nightcliff's mature vegetation is not simply aesthetic. In Darwin's tropical climate, established trees provide shade, reduce surrounding temperatures, support wildlife and contribute significantly to the character and liveability of the suburb.

Subdivision generally means additional buildings, driveways, parking areas and other hard surfaces. Over time, allowing substantially greater subdivision across an established suburb risks progressively replacing gardens and mature vegetation with built infrastructure.

Once that established canopy is lost, it can take decades to replace.

Stormwater and drainage

Increasing building footprints and hard surfaces also reduces the amount of permeable ground available to absorb rainfall.

This is particularly relevant in Darwin, where extremely high volumes of rain can fall during the wet season.

Before facilitating substantially greater development density, we believe there should be clear evidence that existing stormwater and drainage infrastructure can accommodate the cumulative impact of additional buildings, driveways and other impermeable surfaces without increasing runoff or flooding elsewhere.

Traffic and parking

Traffic is already noticeable on Bougainvillea Street and surrounding roads.

Additional dwellings inevitably generate additional vehicle movements and demand for parking. Even where developments provide required off-street parking, increased residential density produces additional visitors, deliveries, service vehicles and general traffic.

These cumulative impacts need to be considered at neighbourhood level rather than development by development.

Privacy and residential amenity

Further subdivision and increased development also have the potential to substantially change privacy and amenity for existing residents through overlooking, reduced setbacks, additional buildings adjoining boundaries and increased activity on previously low-density lots.

People who have purchased and established homes in areas zoned for low-density residential use have reasonably made long-term decisions based upon the planning framework applying to those neighbourhoods.

Changes of this scale should therefore be approached cautiously and with meaningful consideration of existing residents.

A more targeted approach to housing density

We do not oppose increased housing supply or higher-density development in principle.

However, we believe increased density should be strategically concentrated in locations demonstrated to have the infrastructure, road capacity, public transport, drainage and services necessary to support it.

Nightcliff already accommodates a substantial range of housing densities. Further development should occur through considered, location-specific planning rather than broad changes that progressively increase development potential throughout established low-density residential streets.

Housing supply is important, but so too is preserving the qualities that make established Darwin suburbs desirable and liveable in the first place.

We therefore ask that the proposed changes affecting Zone LR not proceed in their current broad form, and that any proposed increases in residential density in Nightcliff be subject to more detailed local planning, infrastructure assessment and meaningful consultation with affected residents.

Yours sincerely,

Paul Clissold & Bec Clissold

 Nightcliff NT 0810

Dear Madam/Sir,

With regard to Planning Application No. PA2026/0205 we wish to advise you of our concerns to the proposed changes of minimum lot sizes reduced to 450 square metres, allowing two dwellings to be built on large residential blocks.

We live in [REDACTED] street, Nightcliff and currently have a total of six people living in two flats opposite us (the property having two garages) and each person has a vehicle, the house and granny flat next to us facing Casuarina Drive has many people living in the two accommodations with a minimum of 7 cars parked on the property and street.

The house opposite us on the left also has two cars (parked in garage, driveway in Sheoak Street) have visitors parking in Sheoak Street, along with people parking and walking to the foreshore.

As it stands now it is very difficult to enter/exit our driveway plus the road hold two passing cars at the same time, with all the vehicles parked in the road.

Our question is, if all the above houses (on large blocks were subdivided) there certainly would be a great deal of congestion.

Nightcliff foreshore is coming into its own "the place to be" Friday/Saturday/Sunday and public holidays

- great ambience, why spoil it with buildings upon buildings - congested parking, we don't want an "urban jungle".

Yours faithfully,

Paul and Carolyn Wakeling

[REDACTED]

Nightcliff

Paul & Carolyn Wakeling

Subject: FW: PA2026/0205 - Proposed changes to block size

From: Malcolm [REDACTED]
Sent: Friday, 14 August 2026 3:54 PM
To: Das NTG <Das.NTG@nt.gov.au>
Subject: PA2026/0205 - Proposed changes to block size

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We are not in agreement with changes to block size. We feel it will mean more traffic on the streets with these proposed changes.
More houses will mean less garden space and reduction in tree canopy.

We already have two lots of units in our street

We hope that for these reasons this proposal will not proceed.

Lorraine Gamea
[REDACTED]
Ludmilla
[REDACTED]

From: Beth Niemeier [REDACTED]
Sent: Monday, 17 August 2026 11:20 PM
To: Das NTG
Subject: Nightcliff proposed amendments to NTPS 2020

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I would like to provide some comments on the proposed amendments to the NTPS 2020.

In regard to Nightcliff the area there has already been significant development with apartments on Progress Drive and Casuarina Drive.

Proposed changes to the NTPS will make irreversible impacts to amenity of large old established blocks in the Nightcliff area. Loss of amenity includes old rainforest, tropical trees, and wildlife habitats of the abundant birdlife, goannas, snakes will impact the attractive streetscapes, including loss of shade and cool spaces around homes. Our block has seen the very rare northern frog, old goannas and 20 different types of birdlife 55 year old Frangipanni trees.. These are all features of why residents enjoy the lifestyle of Nightcliff and continue to choose homes that offer the above amenity.

Loss of shade to homes will require increased cooling impacts on household and the electricity grid. Loss of tree canopies also increase neighbour noise incursions. Further concreting /tiling blocks will increase eat levels and possibly increase water courses issues.

Strain on electricity supply and impacts on an aging and broken sewer network need to be considered. Water infrastructure literally crumbles at times, and further development of blocks will be impacted by the aging infrastructure.

Many streets in Nightcliff shown as possibly eligible to be subdivided are located on narrow streets, where, if cars are parked opposite on a street, garbage truck or emergency vehicles face difficult challenges to pass vehicles as the streets are already very narrow.

Growing development on surround Progress Drive has already impacted traffic on Bouganvillea Street on mornings where traffic has now started to filter through the backstreets at speeds above the local 50 limit creating further issues on Progress Drive especially, to pedestrians trying to cross the road.

Further allowing development , will place further strain on the local facilities and Nightcliff shops, roads and leisure facilities. Traffic has become increasingly backed up through the centre on mornings and with at least 4 schools in the area, causes problems for students and the less mobile when crossing the roads.

Maintaining the amenity of the area of Nightcliff is very important to retain cultural value and history and what keeps Darwin to retain its character.

Thanks
Beth Niemeier
[REDACTED]

From: [REDACTED]
To: [Planning NTG](#)
Subject: Sonja Pastor Submission on PA2026/0205
Date: Tuesday, 18 August 2026 2:36:05 PM

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please acknowledge receipt of my submission below

Submission on PA2026/0205

PA2026/0205 proposes substantial changes to Zone LR, including reducing the minimum lot size from 800m² to 450m² and allowing dwelling-group and dwelling-multiple developments. I submit that the Planning Scheme should not be amended across all Zone LR land without first assessing infrastructure capacity, cumulative impacts and whether the proposal will actually increase the supply of long-term housing.

Place-based planning

The proposed Planning Scheme amendment would apply across all Zone LR land despite repeated calls during consultation for place-based planning based on local infrastructure capacity, with the primary goal of maintaining liveability. The exhibited documents do not identify which suburbs can accommodate increased density, which require infrastructure upgrades, or where neighbourhood character, environmental constraints or local conditions make higher density inappropriate.

Cumulative impacts on infrastructure and services

There is no assessment of the cumulative impacts. Adding hundreds more residents and cars in established suburbs where the road network was designed for low to medium density could compromise access for emergency and utility services if traffic and on-street parking capacity is exhausted.

Increasing housing density across established suburbs will place greater pressure on all existing public infrastructure and services. The proposal repeatedly refers to making better use of existing infrastructure but provides no assessment of road capacity, water, sewerage, electricity, schools, health services or community facilities. It does not identify which established suburbs have the capacity to accommodate additional density or which do not. There is no assessment of whether schools and other essential community facilities and services have the capacity to accommodate the cumulative increase in population.

Cumulative Impacts deferred to individual applications

The exhibited documents repeatedly say that infrastructure and other impacts can be considered later, when individual development applications are lodged. By then, however, the decision to allow increased subdivision across Zone LR will already have been made. Responsibility for identifying and responding to the cumulative impacts is then left to service providers, local government and the community, one application at a time. This assessment should be the responsibility of the Consent Authorities and should be done before the Planning Scheme is amended.

Stormwater and flooding

Increasing housing density means more roofs, driveways and other hard surfaces, leaving less ground and vegetation for rainwater to soak into. Across a suburb, this could substantially increase the amount of water flowing into already ageing stormwater infrastructure during Darwin's heavy wet-season rainfall. This increased runoff increases the risk of local flooding.

Urban heat

Subdivision will lead to more hard surfaces and heat-radiating roofs and less tree canopy and vegetation. This means more heat is absorbed and radiated from built surfaces, while less shade and natural cooling is provided by trees and vegetation, increasing urban heat.

The City of Darwin's Greening Darwin Strategy 2030 and Climate Emergency Strategy 2030, together with the NT Planning Scheme's landscaping and private open space provisions, recognise the importance of tree canopy, vegetation and permeable ground in reducing urban heat and managing stormwater runoff.

This blanket Planning Scheme amendment appears to be at odds with these strategies. The fact that subdivision has been an effective strategy in other Australian jurisdictions does not mean it is appropriate for Darwin. Darwin has already experienced substantial warming, which is why the City of Darwin has adopted a suite of climate emergency strategies to mitigate increasing temperatures.

Interstate investment and reduced liveability

This proposed amendment makes existing Darwin house blocks more valuable for development. Darwin is already attracting substantial interstate property investment because of high rental yields. Interstate investors seek to maximise rental returns and will have a financial incentive to subdivide and increase the number of dwellings on their investment properties, more so than local Darwin residents. But the cumulative costs of

increased traffic and parking pressure, loss of trees and vegetation, increased urban heat and pressure on infrastructure and services, all of which translate into reduced liveability, are carried by the people who actually live here: Darwin residents.

Short-term accommodation

The proposed amendment seeks to increase housing supply by enabling the subdivision of existing residential lots into smaller lots. However, there is no assessment in the exhibited documents of the extent to which existing housing stock has been removed from the long-term rental market over the last decade through the enormous growth of short-term accommodation involving properties that were formerly rented long-term. Before passing this amendment, it needs to be established how much of Darwin's residential stock is unavailable for long-term housing because it is now being used for short-term accommodation.

Creating more subdividable lots does not guarantee that the additional dwellings will enter the long-term rental market. Many may be purchased as investment properties and used for short-term accommodation to maximise returns. Increasing housing capacity does not necessarily equate to increasing housing availability or even affordability.

Neighbourhood character

Finally, to address the claim that the neighbourhood character of Zone LR will be maintained: Darwin's neighbourhood character comes from tropical-designed elevated homes on large, vegetated blocks. If these are progressively replaced by smaller blocks with more dwellings, more roofs, driveways and parking areas, and less vegetation and tree canopy, Darwin's neighbourhood character will inevitably change.

A brief consultation held from 25 November to 19 December 2025, followed by a one-month exhibition of the amendment, is not sufficient community consultation for a permanent change to the character and liveability of Darwin's established suburbs.

PA2026/0205 should therefore be refused until place-based assessments are completed and the cumulative impacts of the proposed changes are fully investigated.

Sonja Pastor

Fannie bay



Northern Territory Planning Commission

By email/online submission

Re: Submission opposing the proposed infill development and subdivision changes to Zone LR (Low Density Residential)

To the Commission,

I am writing to formally record my strong opposition to the proposed changes that would allow greater infill development and subdivision in Zone LR areas, including the reduction of minimum lot sizes from 800m² to 450m², the introduction of battleaxe lots, reduced street frontage requirements, and increased dwelling density on existing blocks.

I want to be clear from the outset that I am not opposed to a growing population, and I recognise that Darwin and Palmerston need more housing. What I oppose is growth that comes at the expense of the lifestyle, space and character that make our region genuinely unique. Density should not be pursued simply because it is administratively convenient. It should only be considered where it can be shown, in advance, that infrastructure, liveability and community wellbeing will not suffer as a result.

Darwin should not become a smaller version of the southern capitals

One of the main reasons people choose to live in, move to, or stay in the Top End is precisely because it does not look, feel or function like Sydney, Melbourne, Brisbane or Perth. Our tropical climate, our block sizes, our gardens and our relaxed, spacious way of life are part of our identity and part of our appeal as a place to live, work and raise a family. Allowing 450m² lots, duplexes, terraces and battleaxe blocks to proliferate through established suburbs risks eroding that identity permanently. Once large blocks are subdivided and mature gardens removed, that character cannot be restored. I do not want Darwin and Palmerston to be judged in twenty years' time by how closely they have come to resemble the crowded outer suburbs of the southern states.

The wellbeing and mental health cost of crowding

Overcrowding is not simply an aesthetic or planning issue — it has real consequences for the mental health and wellbeing of residents. Reducing lot sizes and increasing dwelling density inevitably means:

- Reduced physical distance between neighbouring homes, increasing noise transfer and loss of privacy in daily life, both indoors and in the yard.
- A persistent sense of being overlooked or “closed in”, particularly in a climate where residents rely on outdoor living, verandahs and open windows for large parts of the year.
- Heightened stress and irritability associated with close-quarters living, an effect well documented in higher-density housing research.
- Loss of the psychological relief that comes from having a private, green, open space to retreat to — something that matters enormously in a tropical climate with a long build-up and wet season.

Feeling “crammed in” is not a trivial complaint. It is a genuine quality-of-life and mental health issue, and one that disproportionately affects the people least able to change their circumstances — renters, young families and older residents on fixed incomes.

Families and children need space, not just shelter

A house is not just a roof. For families with children, the yard is where much of childhood actually happens. Reducing minimum lot sizes to 450m² and allowing multiple dwellings on a single block will, in practice, remove the space needed for:

- A grassed yard large enough for children and pets to run and play safely.

- Cricket, football or kicking a ball around without damaging fences, windows or neighbouring properties.
- Swing sets, trampolines and other outdoor play equipment.
- A backyard pool, which for many Territory families is a basic part of coping with our heat, not a luxury.
- A vegetable garden or fruit trees, supporting household food growing and self-sufficiency.
- Riding bikes or scooters in a safe, private space rather than on increasingly congested streets.
- Storage for practical Territory living — boats, trailers, camper trailers and caravans — which simply cannot be accommodated on a 450m² block.

Cramming multiple dwellings onto blocks that were designed for one home does not just reduce comfort — it removes the physical space that active, outdoor, family-oriented living in the Top End depends on.

Loss of green cover, shade and the tropical garden character

Established Zone LR suburbs are valued precisely because of their mature trees, tropical gardens and green canopy. Infill development and smaller lots almost always come at the cost of vegetation, because there is simply not enough land left once a dwelling, driveway, parking and services are accommodated. This has flow-on effects beyond amenity:

- Loss of shade increases the urban heat island effect, making suburbs hotter and less comfortable, and increasing household cooling costs.
- Loss of mature trees and green space reduces habitat for local wildlife, including birds and flying foxes that rely on established suburban gardens.
- Reduced permeable, grassed surface area increases stormwater run-off, worsening localised flooding risk during the wet season.
- The visual and psychological benefit of green, leafy streetscapes — a defining feature of Darwin and Palmerston — is progressively lost.

Infrastructure cannot keep pace

The consultation report itself makes clear that Power and Water has warned that infrastructure in older suburbs is often ageing and undersized, with limited capacity for additional load without significant upgrades. Increasing dwelling density without first securing binding, funded infrastructure upgrades is not responsible planning — it is simply deferring the cost and the consequences onto residents. Specific concerns include:

- Water and sewerage networks in older suburbs that were never designed for two or three times the number of dwellings.
- Electricity networks with limited spare capacity, risking brownouts and reliability issues during peak Wet Season demand.
- Stormwater and drainage systems that are already stretched during heavy monsoonal rain, with reduced permeable land making this worse, not better.
- Roads, verges and on-street parking that were designed around one dwelling per block, not multiple households and multiple vehicles.
- Additional pressure on local schools, health services and community facilities that have not been resourced for higher local populations.

Any infill approval should be conditional on demonstrated infrastructure capacity, not granted on the assumption that services will “somehow cope.”

Traffic, parking and neighbourhood safety

More dwellings per block means more vehicles, more visitors and more daily trips on streets that were never designed for it. Battleaxe lots and reduced frontages in particular create safety issues — for reversing vehicles, for emergency vehicle access, for waste collection, and for children playing near the street. Increased on-street parking in narrow suburban streets also reduces sightlines and increases the risk of accidents involving pedestrians and children.

Cyclone and wet season resilience

Space between dwellings is not just about lifestyle — it is a genuine safety consideration in a cyclone-prone region. Larger blocks and greater setbacks provide a buffer against falling trees and debris, easier access for emergency services and repair crews, and space for safe evacuation and clean-up after severe weather events. Denser development with reduced setbacks increases the risk of cascading property damage when one dwelling is affected by a fallen tree, flooding or storm debris.

A targeted approach is more appropriate than blanket rezoning

I acknowledge the consultation report shows that many respondents support infill in principle when it is well-located — around activity centres, along transport corridors, and near existing services. I do not object to that kind of considered, targeted development. What I strongly oppose is a blanket reduction in minimum lot sizes and blanket permission for multiple dwellings across established, low-density suburbs. Blanket rezoning does not distinguish between a block well-suited to higher density and a block where doing so would cause real harm to infrastructure, amenity and neighbourhood character.

My request to the Commission

I ask the Commission to:

- Reject blanket reductions to the minimum Zone LR lot size and reject blanket approval of multiple dwellings across existing low-density suburbs.
- Require any future infill to be assessed on a location-specific basis, restricted to areas near activity centres, transport corridors and existing infrastructure capacity, as identified in the consultation report.
- Make any increase in density strictly conditional on independently verified infrastructure capacity — water, sewerage, electricity, drainage and roads — with funded upgrades secured before, not after, approval.
- Retain meaningful minimum green/permeable space and tree canopy requirements on any subdivided or infill lot, to preserve shade, drainage and neighbourhood character.
- Protect minimum private open space standards sufficient for a family yard, recognising that outdoor space is essential to family life, child development and mental wellbeing in a tropical climate.
- Give genuine weight to neighbourhood character and community feedback, not just theoretical dwelling yield, in any future planning decisions.

Conclusion

I support responsible, well-planned growth for Darwin, Palmerston and the surrounding region. I do not support growth that treats our suburbs as blank space to be subdivided and densified without regard for infrastructure, lifestyle, safety and mental wellbeing. Darwin's character — spacious blocks, tropical gardens, room for families to live and breathe — is not an obstacle to good planning. It is the thing worth planning to protect. I urge the Commission to take these concerns seriously and to pursue a cautious, targeted and infrastructure-led approach rather than broad-based rezoning of Zone LR land.

Thank you for considering my submission.

Yours sincerely,

Dwayne Clifton

Jaemie Page

[REDACTED]

Jingili NT 0810

[REDACTED]

Re Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to lodge a formal submission regarding proposed Planning Scheme Amendment PA2026/0205. I think there needs to be flexible options for housing but have strong concerns re this proposal and its blanket nature, not taking into account local conditions and factors.

Key concerns:

1. Infrastructure constraints

I am concerned existing sewerage, power and water infrastructure and easements would be strained by extra pressure with more developments and the works would be disruptive to neighbourhoods.

2. Storm water run off

Having a lot more hard surfaces such as roofs, driveways and car parks would mean a lot more stormwater hitting roads and drains and into the sea rather than soaking into the ground. This could lead to local flooding in heavy rain events, damage to infrastructure and loss of groundwater recharge.

3. On-street parking and traffic

In-fill would create a lot more traffic on local roads, more cars being parked on roads and likely neighbourhood disputes about such. More cars on quiet suburban streets makes it less safe for people, especially children to walk, ride or play.

4. Negative impact on social and environmental nature of our suburbs

Loss of trees and green space would negatively impact cooling and airflow in suburbs leading to increased temperatures and loss of outdoor lifestyle, loss of neighbourhood socialising and more people would be indoors in air-conditioning 24/7, with more power required. Less trees means less biodiversity.

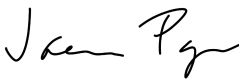
5. Existing planning laws already allow consideration for higher density developments.

Recommendations

- Detailed infrastructure capacity assessments are needed for any areas where in-fill is proposed.
- Planning should be considered locally, case by case, or at least suburb by suburb, not a blanket rule across the NT ignoring the many diverse environments and conditions.
- We need to keep tree canopies and have strategies and rules to reduce urban heating, especially as climate change increases temperatures.

Thank you for considering this submission.

Date: 19.08.2026

Signed: 

To:
Subject: FW: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

From: Martin Jackson [REDACTED]
Sent: Wednesday, 19 August 2026 8:07 AM
To: Das NTG <Das.NTG@nt.gov.au>
Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Sir or Madam,

I am writing to lodge a formal submission against the proposed Planning Scheme Amendment PA2026/0205.

My key concerns are as follows:

There seems little consideration for climate resilience. Planning should include higher property insulation, better building orientation with the sun, many more trees to provide shade and cooling. Trees close to buildings are less prone to cyclones. Flooding maps need redrawing to take into account rising sea levels and should take into account expected sea levels throughout the life of the properties. Other states are doing this smarter and better.

Increased density requires more space for cars and people. This doesn't seem to be seriously respected in the plans. More water and electricity will be needed. It is not fair for existing residents to lose water pressure and then an additional building to require new power supplies. There seems to be no account for the increased volumes of sewerage required.

We want a beautiful Darwin to be proud to live in while rampant development without regard to suburb differences and aesthetics will damage this for the sake of a few dollars to the few.

Also no real consideration to seriously build low cost housing for our young families and nothing for social housing.

Please reconsider a much wider consultation and listening to social planning experts

Martin Jackson, [REDACTED] Rapid Creek, NT 0810

Submission on proposed infill development and subdivision in Zone LR

Low Density Residential | NT Planning Scheme 2020

Submitted by	Bryson Lashbrook
Date	19 August 2026

Director
Northern Territory Planning Commission
GPO Box 1680
DARWIN NT 0801

Dear Director

Re: Proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential)

I write to object to the proposed amendment to the NT Planning Scheme 2020 in its current form. I recognise the need to increase housing supply and provide a greater range of housing choices. However, the proposed Territory-wide reduction in the minimum lot size from 800 m² to 450 m², with discretion for lots as small as 405 m², together with new opportunities for dwelling-group, dwelling-multiple and battle-axe development, in some instances would materially change the established purpose and character of Zone LR.

The central issue is not whether infill development should occur, but whether this broad amendment represents sound planning for a tropical city. Darwin's residential form must respond to heat, humidity, intense wet-season rainfall and severe weather. Large lots, mature trees, deep shade, permeable ground, generous setbacks, cross-ventilation and usable outdoor areas are not merely aesthetic preferences. They are practical elements of tropical urban design and contribute directly to liveability, environmental performance and resilience.

Tropical urban design and the character of Darwin

Darwin should not be planned as though it were a temperate southern capital. The Top End lifestyle is closely connected to space, vegetation, outdoor living and informal green character. Established low-density neighbourhoods provide room for substantial shade trees, gardens, recreation, airflow around homes and separation between buildings. These qualities help make homes and streets more comfortable in a hot and humid climate.

Reducing the minimum lot size by almost half would place greater pressure on each site to accommodate buildings, parking, driveways, services and private open space within a much smaller area. Even where an individual proposal technically meets existing landscaping, setback and open-space controls, repeated redevelopment across a suburb could progressively reduce deep-soil areas, mature canopy and the spacious character that the LR zone was intended to provide.

The explanatory document states that the amendment would maintain the intent and character of Zone LR, but it does not demonstrate how that outcome would be secured at neighbourhood scale. Allowing forms of development that are currently prohibited, reducing frontage requirements and permitting battle-axe lots would create a clear pathway to a more intensive urban form. That may be appropriate in selected locations, but it should occur through place-based strategic planning rather than a blanket change across all LR-zoned land.

Tree canopy, heat and outdoor liveability

Mature tree canopy is essential infrastructure in a tropical city. It provides shade to homes, streets and outdoor areas, moderates local temperatures, improves pedestrian comfort and reduces reliance on mechanical cooling. Tree canopy also supports urban biodiversity and helps retain the green character valued by residents.

The proposal does not quantify the likely effect of smaller lots and increased site intensity on existing canopy or future capacity to establish large trees. The planning assessment should examine not only whether a small landscaped area can be provided on each lot, but whether sufficient deep-soil area, setbacks and canopy targets will remain to sustain large, cyclone-appropriate shade trees over the long term.

This is particularly important because Darwin has already experienced substantial canopy loss from extreme weather. CSIRO's Darwin Living Lab reported that canopy cover in the City of Darwin local government area fell by more than 1,300 hectares, or 33 per cent, between 2016 and 2021, largely because of Tropical Cyclone Marcus in March 2018. Planning changes should help rebuild and strengthen the urban forest, not make canopy recovery more difficult.

Climate resilience and severe weather

The relationship between trees and cyclone damage is complex. Poorly selected, poorly maintained or structurally unsound trees can become hazards in extreme winds. It would therefore be inappropriate to claim that reduced canopy will automatically increase building damage during a cyclone. Equally, the absence of a climate-resilience assessment is a significant gap. A well-planned urban forest, using suitable species, appropriate setbacks, structural diversity and active maintenance, can form part of a broader resilience strategy while continuing to provide shade, rainfall interception and environmental benefits.

Current Australian climate evidence supports a precautionary approach. The CSIRO and Bureau of Meteorology report that heavy rainfall events are becoming more intense, with some of the largest increases in short-duration extreme rainfall observed in northern Australia. They also note that the trend in tropical cyclone intensity in the Australian region is difficult to quantify because of limited observations and uncertainty. The submission therefore does not rely on a definitive claim that cyclones will become more frequent or stronger. Instead, it argues that planning decisions with long-lived consequences should preserve adaptive capacity and avoid increasing exposure to heat, runoff and loss of vegetation.

Smaller lots and higher site coverage are also likely to reduce permeable ground and increase runoff unless strong controls are applied. Cumulative effects across many separate approvals may place additional pressure on local drainage during intense wet-season rainfall. These impacts should be assessed at suburb and catchment scale, rather than left solely to individual development applications.

Issue	Planning implication
Urban heat	Retain mature shade canopy, deep-soil areas and space for large trees; avoid development controls that increase hard surfaces without canopy targets.
Extreme rainfall	Assess cumulative runoff and drainage capacity at neighbourhood and catchment scale; preserve permeable surfaces and on-site infiltration.
Cyclone resilience	Use cyclone-appropriate species, siting and maintenance. Treat canopy as managed green infrastructure, while recognising that unsafe trees can create hazards.
Energy demand	Protect shade and natural airflow to reduce dependence on air-conditioning and improve comfort during power disruptions.

Biodiversity	Maintain connected vegetation and habitat across private and public land, rather than relying on small isolated landscaped areas.
Adaptive capacity	Avoid permanently removing space that could support future shade, stormwater treatment, gardens and climate-responsive retrofits.

Key climate resilience considerations

Housing supply and strategic planning

The explanatory document identifies housing diversity, more efficient use of serviced land and flexibility for changing household needs as the principal benefits. These are legitimate objectives, but the proposal does not establish that a Territory-wide change to every LR area is the most appropriate or effective response. Nor does it demonstrate that additional development capacity will translate into affordable housing outcomes.

A more balanced approach would identify locations suitable for additional density through area plans or precinct-based analysis, taking account of infrastructure capacity, public transport, drainage, tree canopy, neighbourhood character and access to services. This would allow housing growth to be directed to suitable locations while preserving established low-density areas that make an important contribution to Darwin's housing choice and tropical character.

Requested changes

I request that the proposed amendment not proceed in its current form and that the Northern Territory Government instead:

- undertake a tropical urban design and climate-resilience assessment before changing Zone LR controls;
- assess likely cumulative impacts on tree canopy, deep-soil area, urban heat, stormwater runoff, biodiversity, energy demand and neighbourhood character;
- use area plans or mapped precincts to identify where additional density is suitable, rather than applying the same provisions to all Zone LR land;
- retain the existing 800 m² minimum in established low-density areas unless a place-based review demonstrates that a different standard is appropriate;
- if smaller lots are progressed, introduce enforceable canopy, deep-soil, permeability, shade and climate-responsive design requirements alongside the amendment;
- require infrastructure and drainage capacity to be demonstrated at neighbourhood scale before substantial infill is enabled; and
- publish the evidence relied upon to conclude that the proposed changes will maintain the purpose, amenity and character of Zone LR.

Conclusion

Darwin's planning system should be designed for a tropical city, not simply to maximise housing yield and profit. The green, spacious and outdoor character of established residential areas is part of the Top End lifestyle, but it is also part of the city's climate response. Once mature canopy, deep-soil areas and low-density character are removed, they are difficult and costly to restore.

I support carefully planned housing diversity in appropriate locations. However, the proposed blanket reduction in lot sizes and expansion of multi-dwelling development in Zone LR is not supported by adequate assessment of tropical urban design, climate resilience or cumulative neighbourhood impacts. I respectfully request that the amendment be reconsidered and replaced with a more strategic, place-based and climate-responsive approach.

Yours sincerely,



Bryson Lashbrook

References

1. Northern Territory Government, Explanatory Document: Proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential).
2. CSIRO and Bureau of Meteorology, State of the Climate 2024: Australia's changing climate.
3. CSIRO Darwin Living Lab, Tree canopy cover change from 2011, 2016 and 2021, 13 July 2023.

Northern Territory Planning Commission

By online submission

Re: Submission opposing the proposed infill development and subdivision changes to Zone LR (Low Density Residential)

Traci Clifton

To the Commission,

I am writing to formally record my strong opposition to the proposed changes that would allow greater infill development and subdivision in Zone LR areas, including the reduction of minimum lot sizes from 800m² to 450m², the introduction of battleaxe lots, reduced street frontage requirements, and increased dwelling density on existing blocks.

I want to be clear from the outset that I am not opposed to a growing population, and I recognise that Darwin and Palmerston need more housing. What I oppose is growth that comes at the expense of the lifestyle, space and character that make our region genuinely unique. Density should not be pursued simply because it is administratively convenient. It should only be considered where it can be shown, in advance, that infrastructure, liveability and community wellbeing will not suffer as a result.

Darwin should not become a smaller version of the southern capitals

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Feeling “crammed in” is not a trivial complaint. It is a genuine quality-of-life and mental health issue, and one that disproportionately affects the people least able to change their circumstances - renters, young families and older residents on fixed incomes.

Families and children need space, not just shelter

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- A grassed yard large enough for children and pets to run and play safely.

- Cricket, football or kicking a ball around without damaging fences, windows or neighbouring properties.
- Swing sets, trampolines and other outdoor play equipment.
- A backyard pool, which for many Territory families is a basic part of coping with our heat, not just a luxury.
- A vegetable garden or fruit trees, more than just for supporting household food growing and self-sufficiency, but for the pure enjoyment of it.
- Riding bikes or scooters in a safe, private space rather than on increasingly congested streets.
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Cramming multiple dwellings onto blocks that were designed for one home does not just reduce comfort, it removes the physical space that active, outdoor, family-oriented living in the Top End depends on.

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The consultation report itself makes clear that Power and Water has warned that infrastructure in older suburbs is often ageing and undersized, with limited capacity for additional load without significant upgrades. Increasing dwelling density without first securing binding, funded infrastructure upgrades is not responsible planning, it is simply deferring the cost and the consequences onto residents. Specific concerns include:

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- Electricity networks with limited spare capacity, risking brownouts and reliability issues during peak Wet Season demand.
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- Roads, verges and on-street parking that were designed around one dwelling per block, not multiple households and multiple vehicles.
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Any infill approval should be conditional on demonstrated infrastructure capacity, not granted on the assumption that services will “somehow cope.”

Traffic, parking and neighbourhood safety

More dwellings per block means more vehicles, more visitors and more daily trips on streets that were never designed for it. Battleaxe lots and reduced frontages in particular create safety issues for reversing vehicles, emergency vehicle access, waste collection, and for children playing near the street. Increased on-street parking in narrow suburban streets also reduces sightlines and increases the risk of accidents involving pedestrians and children.

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My request to the Commission

I ask the Commission to:

- Reject blanket reductions to the minimum Zone LR lot size and reject blanket approval of multiple dwellings across existing low-density suburbs.
- Require any future infill to be assessed on a location-specific basis, restricted to areas near activity centres, transport corridors and existing infrastructure capacity, as identified in the consultation report.
- Make any increase in density strictly conditional on independently verified infrastructure capacity - water, sewerage, electricity, drainage and roads - with funded upgrades secured before, not after, approval.
- Retain meaningful minimum green/permeable space and tree canopy requirements on any subdivided or infill lot, to preserve shade, drainage and neighbourhood character.
- Protect minimum private open space standards sufficient for a family yard, recognising that outdoor space is essential to family life, child development and mental wellbeing in a tropical climate.
- Give genuine weight to neighbourhood character and community feedback, not just theoretical dwelling yield, in any future planning decisions.

Conclusion

I support responsible, well-planned growth for Darwin, Palmerston and the surrounding region. I do not support growth that treats our suburbs as blank space to be subdivided and densified without regard for infrastructure, lifestyle, safety and mental wellbeing. Darwin's character - spacious blocks, tropical gardens, room for families to live and breathe - is not an obstacle to good planning. It is the thing worth planning to protect. I urge the Commission to take these concerns seriously and to pursue a cautious, targeted and infrastructure-led approach rather than broad-based rezoning of Zone LR land.

Thank you for considering my submission.

Yours sincerely,

Traci Clifton
Traci Clifton
Business Owner

Dear Planning Authority,

I wish to submit my objection to this planning proposal which facilitates large Darwin blocks to be rezoned to allow two dwellings to be built on the same block, or subdivided into two separate blocks.

My family has lived on Bremer St for fifteen years now. The blocks in my area contain well established gardens, large trees, and wide corridors of green vegetation. Our suburb borders the Lumilla Creek region, and much wildlife including birds, reptiles, and small mammals regularly traverse through our gardens and utilise the green spaces in our back yards. The wide gaps between dwellings allows cooling breezes to flow through our suburb, and minimizes the absorption of radiant heat from man-made materials (like concrete, asphalt, steel, paving etc). In a future world of higher greenhouse gas emissions, and higher temperatures, it becomes even more important that we do not actively raise the ambient temperatures in our suburbs by densification of more buildings and dwellings into tighter spaces. We already live in a hot climate, we don't want densification making our life even hotter.

Closer living reduces carparking spaces within the allotment and forces more on-street parking, blocking through traffic along roads, and introduces more local congestion as people try to enter / exit onto adjoining main roads. More people living in the area increases noise pollution, less play areas around houses / yards for kids to enjoy outside spaces. There will be a heavier use of existing infrastructure and services including power, water, internet, sewerage etc. House air-conditioning units are closer together on more densely packed dwellings meaning hot air vented can't dissipate and the region heats up between homes. You have less personal space as you hear your neighbour's music, TV, arguments, A/C's etc. when dwellings are much closer together.

We bought in our area because of the large allotment sizes, green belts and all the benefits it provides for enjoyable living, and now governments are trying to take that away because they have not sufficiently planned enough alternative vacant land and new suburbs to be used for higher denser living. If governments want more density, they should utilise other existing vacant properties or crown land, or develop multi-storey dwellings to zoned lands already available, not try and cram more houses/units into existing residential suburbs. The proposed zoning amendments do not represent good planning by government, rather they highlight a lack of forward planning and poor allocation of funding to critical new suburb development / infrastructure / fast public transport corridors and systems which should linking the Darwin region together.

Please do not destroy our lovely Ludmilla suburb. We want to keep our living standards as they are, without feeling like we are intruding on our immediate neighbours, and enjoying the wonderful wildlife that shares our backyards every day.

Thanks for your consideration of my submission.



Scott Reynolds

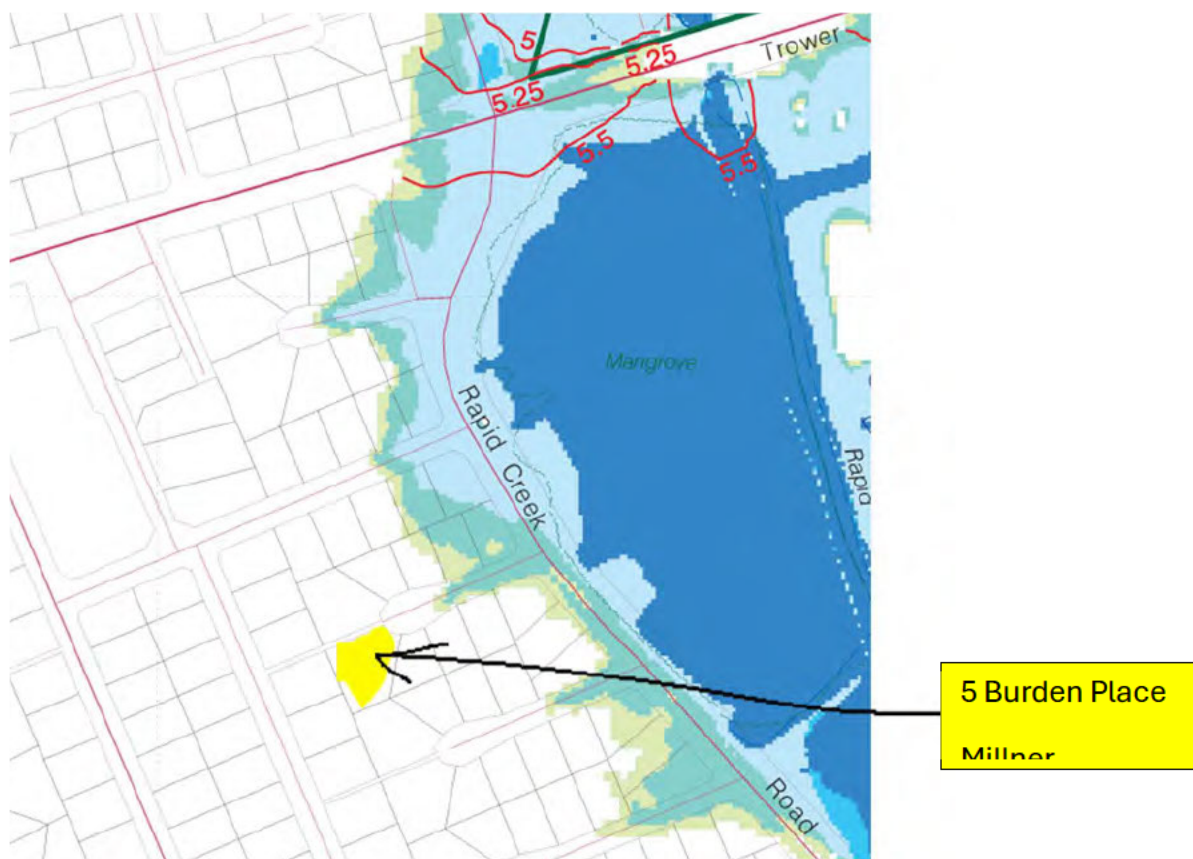
 Ludmilla.

Peter Stephenson
& Catherine Holmes

Hello

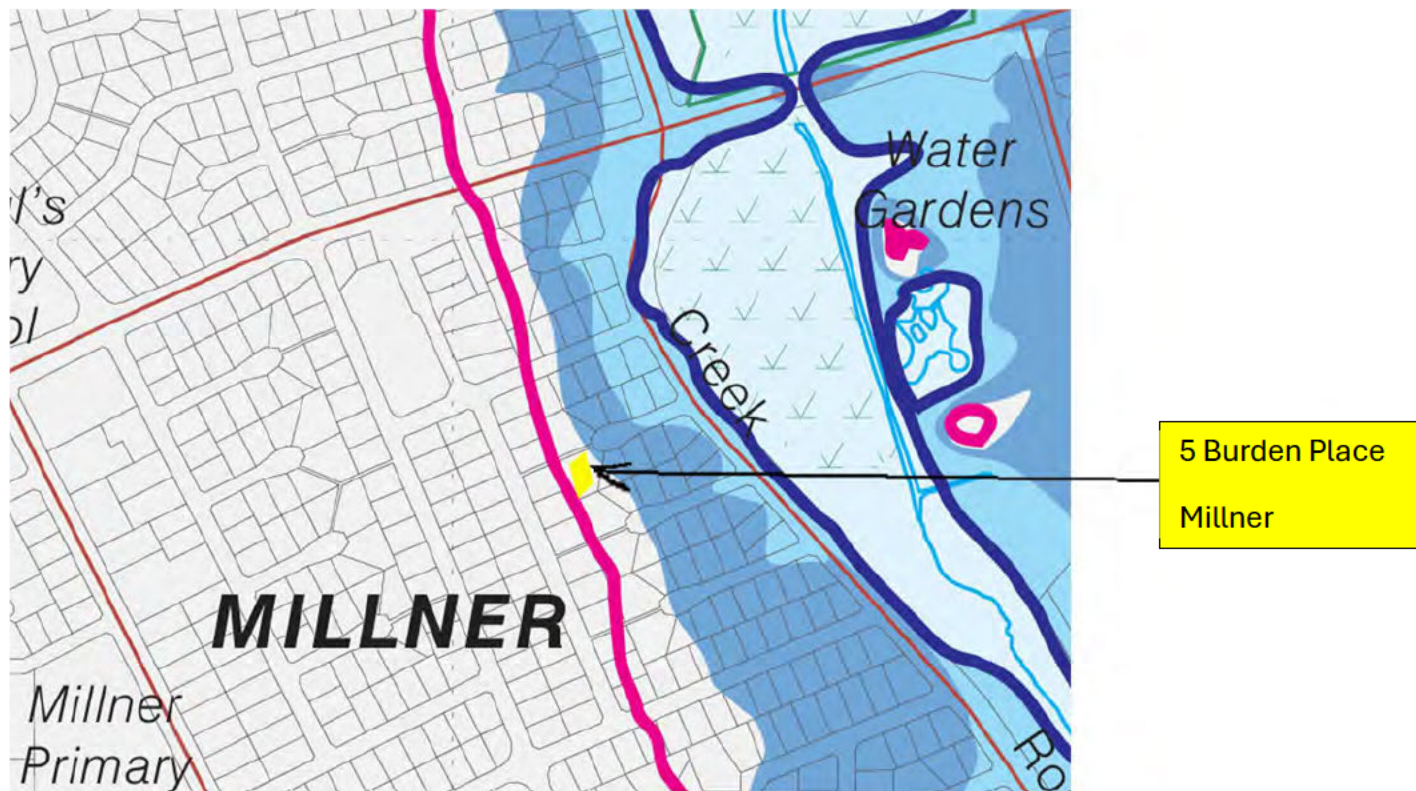
We are the owners of a property at 5 Burden Place, Millner. We are in general support of the proposal to amend the planning scheme to enable infill development and subdivision of residential blocks 900m² and greater in the Town of Nightcliff.

However we make the case here for a case-by-case analysis of some blocks that are only marginally affected by the storm surge line. In our case, property 5 Burden Place is outside of the flood zone as shown below.



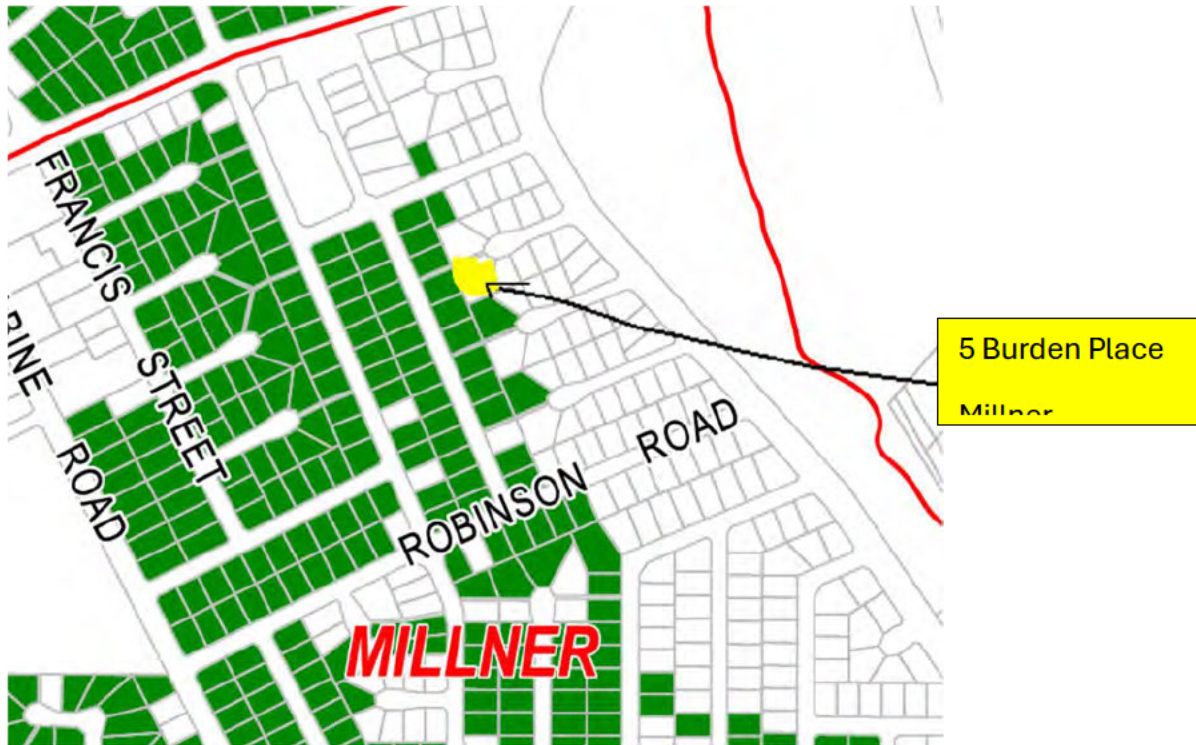
[Rapid Creek with Detention Basin Q100 Y2100 Flood Extent.pdf](#)

However there is a small section at the street front that cuts across the NTG Storm Surge line, as per below.



[Darwin 2100 Storm Surge - Sept 2020.pdf](#)

Under the proposal, this surge line makes 5 Burden Place ineligible for development in line with the intent of the proposed planning scheme amendment.



[Appendix B - Map - Town of Nightcliff.pdf](#)

We contend that the surge line as the determinant for excluding our block from eligibility for infill development is a blunt instrument and should be reviewed to take account of block-specific conditions, on a case-by-case basis. In the case of our block of over 1600m² (and a few other cul-de-sac blocks in this area off Rapid Creek Rd), the surge line:

- Encroaches only minimally across the driveway of this larger-than-standard block, leaving considerably more land for infill development than the average 900-1000m² block
- Does not reach into the block to anywhere near the current positioning of a residential building
- Would not reach into the block as far as any standard building setback requirements associated with a new residential development approval.

We request specific eligibility criteria be developed to enable inclusion in the scheme of certain larger sized blocks that have only a manageable degree of storm surge impact.

Re. Planning development PA2026/0263. Reduction of lot sizes to 450 metres square

I am against the reduction in the established areas of all established Darwin, Rapid Creek and Nightcliff for the following reasons:

The amenities for families in local parks has been reduced over the years, Ternau St park being of evidence here. Playground equipment etc. removed. Although this is a council responsibility and may not be relevant here it does have impact on lifestyle.

Infrastructure such as power, water, sewerage and roads was initially designed for around the current population levels. This is seen by the amount of maintenance required each year currently. Increasing population in any area will result in major works including ground upheaval will interfere with residents. This will be funded How?

Traffic and associated hazards will increase in streets directly affected and other side streets leading into the following. This is evident now with traffic jams on Nightcliff Rd and Progress drive prior to school starting and at the end of school day.

There are only 2 entries into Rapid creek and Nightcliff with traffic lights and these can become very congested at times. The other entry at Ryland Rd is considerably more dangerous than need be if the Rapid Creek shop crossing lights had been located at this intersection.

All the areas specified are green and leafy and wildlife and bird havens which we would lose as replanting trees would possibly be restricted as in other newer suburbs.

This reduction of lot sizes was attempted by CLP in about 2014-15 and was abandoned then. I cannot see attitudes of locals changing much since. These older areas are popular because of the space, size of schools, greenery etc. Indeed if this has been in the CLP playbook since that time it should have been raised prior to election.

The schools in this area are running at capacity including the private school which has put in demountable classrooms.

Regards, Peter Roe

[REDACTED]

Planning Scheme Amendment

I wish to state that I do not support the proposal to reduce house lot sizes in the towns of the Northern Territory.

The Governments are constantly talking about the environment, climate change and the need for everyone to be aware of the future implications that these things will do to our community.

There is also the question as to whether the current infrastructure will be able to cope with the extra demand placed on water, sewer and electricity use.

Together with the reduction for Wet Season rains to drain from the land as there is less natural soils to soak up the water due to less open land. This could cause minor types of flooding to some streets and lots.

With existing lots being changed to 2, means there will need to be space for driveways that will further reduce the space for a home.

There will be some lots that due to the placement of the original house will not be able to be sub divided unless the original house is demolished. Would this not be contrary to the proposal of providing extra housing?

There are currently in some of the newer suburbs lots that are too small for even a shade tree to be planted as the roots could affect underground infrastructure. Roof edges are close to or almost touching the fence line, thus preventing natural breezes to access dwellings and reduce internal heat.

This Government and the previous one have no real understanding of the effects that climate change is making.

Houses that must constantly have air conditioning going because they are not built for the environment, using more power, streets that are too narrow for shade trees to be planted and the house lots are too small for shade trees. Is this good tropical design and forward climate change initiatives? I think not.

No way for natural cross ventilation to circulate into and around homes as they are built way too close thereby preventing any breezes

Is it not time that you consulted professional engineers and designers to come up with proposals that would allow better home design specifically for the tropics and amend the Planning Act to recognize those things. Not just ad hoc idiotic ideas from unqualified people.

How will smaller lots reduce the cost of a house. To me this is going to increase the cost. To be able to design a family size home that can fit on a lot less than 400sqm and provide all things a family needs i.e. 3 -4 bedrooms 2 bathrooms. Living room, spare games/study room, kitchen & dining areas at least two car bays, with outdoor space and privacy from noises coming from neighbours.

You really have not thought this thru properly and rushing into something that will most definitely not help with more suitable housing and more likely to cause over - crowding.

You need to look at purpose designed suburbs for tropical living. There are a number of areas waiting for development how about you look at those. Ensuring the streets are wide enough for shade trees and also some small tree plantings in the house lots.

Trees are a major part to reducing increased temperatures and help retain the native species that the land relies on.

Laurie Palfy

[REDACTED] Darwin

Submission on PA2026/0205 – Proposed Changes to Zone LR

My position

I ask the Minister not to approve PA2026/0205 in its current form and to require further information before such broad changes are made to Zone LR.

For clarity, nothing in this submission should be taken as support for PA2026/0205 in its current form.

PA2026/0205 would significantly expand development opportunities across Zone LR, but it does not yet clearly establish which areas can support that growth, what infrastructure upgrades would be required, or the combined impact of repeated redevelopment on shared infrastructure networks.

1. The infrastructure work should come first

PA2026/0205 would reduce minimum lot sizes and introduce forms of housing that are not currently anticipated as standard development in Zone LR. This represents a significant change to how the zone can be developed, making it important to establish whether existing infrastructure can support that increased development.

Source: Explanatory Document, pp. 4–8; Appendix A, Clauses 4.2, 5.4.1, 6.2.1 and 6.2.2.

These infrastructure concerns are not hypothetical. They have already been raised by Power and Water and the Planning Commission.

Power and Water reported that infrastructure in some older areas has limited remaining capacity. It also said increased density may require major upgrades, and that the cost of those upgrades could make some development unviable. It therefore supported identifying suitable infill areas early and avoiding locations that would require major infrastructure investment.

Source: NT Planning Commission, Report to the Minister, pp. 7–8.

The Planning Commission itself said broad Planning Scheme changes would require “testing and detailed analysis” to ensure they work as intended and are suitable across the different circumstances of the Territory.

Source: NT Planning Commission, Report to the Minister, p. 12.

Changing the rules before infrastructure capacity is established risks creating development opportunities that work on paper but require costly upgrades, face delays or prove unviable.

Given the scale of the proposal and the infrastructure concerns already identified, I believe the necessary testing and infrastructure analysis should be completed before any amendment is approved.

2. Infrastructure should shape the rules — not be dealt with afterwards

Individual development assessment can look at whether one proposal can be serviced. It does not show whether shared infrastructure can support repeated redevelopment across Zone LR.

If the Planning Scheme is changed before that work is done, infrastructure constraints risk being dealt with one application at a time. This could turn a strategic planning issue into a series of project-by-project problems involving upgrades, costs, delays or developments that cannot proceed.

The Planning Commission recorded concerns about these combined impacts, along with suggestions to focus infill in areas with existing infrastructure capacity and use more localised or staged implementation.

Source: NT Planning Commission, Report to the Minister, p. 5; Consultation Summary Report, pp. 15–16.

The Government's own Explanatory Document says the amendment seeks to facilitate housing in existing urban areas where infrastructure is available or suitable for upgrade. Yet the maps showing properties that may be able to use the new rules do not take infrastructure capacity into account.

Source: Explanatory Document and FAQ, pp. 11 and 13.

The Planning Commission also said consideration should be given to releasing consultation material showing likely affected lots, known infrastructure capacity, or both, where that information was available for release.

Source: NT Planning Commission, Report to the Minister, p. 10.

Taken together, this supports using infrastructure capacity to help determine where increased development opportunities should be enabled.

That also affects how much new housing the amendment is likely to deliver. The Planning Commission identified infrastructure capacity, project feasibility, lot configuration and landowner interest as factors that may limit development.

Source: NT Planning Commission, Report to the Minister, pp. 8 and 13.

3. What I ask the Minister to do

The Planning Act 1999 allows the Minister to require further information and, if appropriate, alter the proposed amendment. In making that decision, the Act also requires consideration of the proposal's merits and whether it is in the public interest.

With that in mind, I respectfully ask the Minister to require further information about infrastructure capacity, the likely cost of required upgrades and the overall impact of increased development across Zone LR before deciding PA2026/0205.

Source: Planning Act 1999 (NT), s 25.

At a minimum, further work should establish:

- which Zone LR areas have sufficient infrastructure capacity, or infrastructure that can reasonably be upgraded, to support increased development;
- what upgrades would be required, their likely cost and timing, and the combined impact of multiple developments on shared infrastructure; and

- whether the evidence supports a broad change across Zone LR or a more targeted or staged approach.

I also ask the Minister, where appropriate, to seek written advice from relevant infrastructure providers and affected local councils under section 24(3) of the Planning Act 1999.

If the evidence shows that some areas can support increased development and others cannot, any revised proposal should reflect those differences. My objection is to PA2026/0205 in its current broad form. If further analysis supports increased development in particular areas, that evidence should be used to shape a targeted or staged proposal.

If the Minister nevertheless approves PA2026/0205 in its current form, or with only minor changes, I ask that the written reasons made available to the public clearly explain why a broad change across Zone LR was considered justified despite the infrastructure constraints already identified and the need for further testing and analysis.

Source: Planning Act 1999 (NT), s 29.

Signed:



Ailsa Leibrick

References

Department of Lands, Planning and Environment (2026). *Explanatory Document and Frequently Asked Questions – Proposed Planning Scheme Amendment to Facilitate Infill Development and Subdivision in Zone LR (Low Density Residential), PA2026/0205.*

Department of Lands, Planning and Environment (2026). *Appendix A – Proposed Planning Scheme Amendment: Infill Development and Subdivision in Zone LR.*

Northern Territory Planning Commission (2026). *Report – Review to Identify Opportunities for Infill Development and Subdivision in Zone LR (Low Density Residential).* Report to the Minister for Lands, Planning and Environment.

Northern Territory Planning Commission (2026). *Consultation Summary Report – Infill Development and Subdivision in Zone LR (Low Density Residential).*

Northern Territory Government. *Planning Act 1999 (NT),* particularly ss 24(3), 25 and 29.

Submission against Planning Scheme Amendment PA2026/0205
Planning Scheme Amendment to facilitate smaller blocks in Zone LR

20th August 2026

To the Development Assessment Services/ Minister for infrastructure. Planning and Logistics

I am writing to strongly object to Planning Scheme Amendment PA2026/0205, which proposes changes to the Northern Territory Planning Scheme 2020 to facilitate infill development and subdivision in Zone LR, including smaller residential lots.

I support appropriate housing growth in Darwin. However, I do not believe that reducing the minimum lot size in established low-density residential suburbs is an appropriate way to achieve that growth. In my view, the proposed changes risk fundamentally altering the character, amenity, environmental qualities and infrastructure capacity of established northern suburbs.

1. The proposal does not adequately reflect the needs and expectations of existing communities

The Planning Act 1999 identifies, among its objectives, ensuring that strategic planning reflects the wishes and needs of the community and that appropriate public consultation and input are included in the formulation of planning schemes.

As a resident of Wulagi and a member of the Darwin community, I strongly object to this proposal.

I recently purchased my home in Wulagi in 2025 after approximately a year of searching for a larger property to accommodate my growing family. We deliberately chose an established, quiet and leafy court because this type of environment was important to us. We paid a significantly higher price for a property in this location because of the qualities of the surrounding neighbourhood.

The proposed amendment has the potential to undermine precisely those qualities that attracted us to the area.

We could have purchased a four-bedroom, two-bathroom home in suburbs such as Muirhead or Lyons. We deliberately chose not to do so because those suburbs offer a different style of living from what our family wanted.

I am not opposed to smaller residential lots or well-planned higher-density housing. Muirhead and Lyons demonstrate that smaller lots can be incorporated into new suburbs where the subdivision, road network, landscaping, housing placement, fencing and other design considerations are planned from the beginning.

My concern is that the proposed amendment would apply increased development potential to established suburbs that were not designed for this level of density.

2. Established leafy suburbs should not be treated in the same way as planned greenfield development

The existing planning framework already recognises a distinction between greenfield areas planned for compact urban growth and established LR areas.

This distinction is important.

New suburbs can be designed around their intended density, with appropriate road layouts, drainage, utilities, landscaping, open space and housing orientation. Established suburbs have existing roads, mature vegetation, existing houses and established patterns of development.

Increasing the development potential of existing residential blocks without ensuring equivalent safeguards risks creating incremental overdevelopment rather than genuinely planned urban consolidation.

If the Government wishes to facilitate smaller lots, I believe priority should be given to areas where infrastructure and the urban form can be planned or upgraded to accommodate the additional density.

3. Significant increase in development potential in my immediate neighbourhood

The potential impact is not theoretical in my immediate area.

Within a small area around my home, consisting of a short section of street and a small court, there are approximately 20 existing residential blocks. Based on my understanding of the proposed changes, approximately 13 of those blocks could potentially be capable of subdivision, while approximately seven would remain unable to be subdivided.

If all 13 potentially subdividable blocks were subdivided, this could result in up to 13 additional dwellings in a very small area — increasing the number of dwellings from approximately 20 to approximately 33.

That represents a substantial increase in residential density in a very confined area.

The resulting impacts could include:

- substantially increased vehicle movements;
- increased demand for on-site and street parking;
- increased traffic and congestion on small residential roads;
- increased noise;
- increased pressure on existing utilities;
- loss of mature vegetation and tree canopy;
- reduced privacy and residential amenity; and

- changes to the character of the existing street and neighbourhood.

I believe these cumulative impacts need to be properly assessed before the planning rules are changed.

4. Traffic and parking impacts

The potential increase in vehicle numbers is particularly concerning.

If 13 additional dwellings were created and each household had two or three vehicles, the number of additional vehicles associated with this small area could be substantial — potentially up to approximately 39 additional vehicles.

I acknowledge that not every new household will own three vehicles and that actual vehicle numbers will vary. Nevertheless, the potential increase demonstrates why the cumulative traffic and parking impacts of the proposed amendment need to be properly assessed at the neighbourhood level.

A small residential court and local street should not be expected to absorb a substantial increase in traffic and parking simply because individual blocks become capable of subdivision.

5. Loss of mature trees and the urban heat environment

One of the major attractions of established northern suburbs such as Wulagi is the mature vegetation and established tree canopy.

Increasing the number of dwellings on existing residential land creates a significant risk that mature trees, palms and other vegetation will be removed to accommodate additional dwellings, driveways, garages, parking and associated infrastructure.

This is particularly concerning in Darwin's hot tropical climate.

Mature trees and palms provide shade and contribute to the cooling and amenity of residential areas. The cumulative removal of vegetation across many individual subdivisions could substantially reduce the leafy character and environmental performance of established neighbourhoods.

The loss of canopy should therefore be considered as a cumulative planning issue rather than simply as an issue affecting individual development applications.

At a time when governments are seeking to improve urban resilience and respond to increasing temperatures, it seems counterproductive to introduce planning changes that could encourage the removal of mature vegetation from established residential areas without strong replacement and retention requirements.

6. Tropical climate and airflow need to be considered

Darwin's hot climate makes the design of residential neighbourhoods particularly important.

The layout and orientation of houses, the retention of vegetation, setbacks and spacing between buildings all contribute to the ability of established neighbourhoods to maintain airflow, shade and outdoor amenity.

Newer suburbs such as Muirhead and Lyons have been planned with these considerations in mind.

I am concerned that simply increasing the number of dwellings capable of being constructed on existing blocks will not necessarily reproduce those outcomes.

The Government should demonstrate how the proposed amendment will protect the tropical design characteristics of established northern suburbs, including airflow, shade, landscaping, tree retention and adequate separation between buildings.

7. Existing water infrastructure needs to be considered

There is also a significant infrastructure concern in my local area.

Wulagi currently experiences poor water pressure. I recently measured the water flow at my property by filling a 10-litre bucket, which took approximately 58 seconds during the day. Water pressure is even poorer in the evening, particularly after approximately 5:00 pm when residents return home.

This is a practical example of why infrastructure capacity needs to be considered before substantially increasing residential density.

I am concerned that adding a significant number of additional dwellings to established suburbs without first demonstrating adequate capacity in the existing water infrastructure could further reduce the reliability and quality of essential services.

I therefore request that the Government obtain and publish advice from the relevant service authorities demonstrating that existing water supply infrastructure has sufficient capacity to accommodate the additional dwellings that could result from this amendment.

The same assessment should apply to sewerage, stormwater, electricity, roads and other essential infrastructure.

8. Development should occur where infrastructure can support it

Darwin still has plenty of opportunities for new residential development in greenfield areas.

I believe there is a strong case for directing a greater proportion of new housing growth towards areas where entire neighbourhoods can be planned around the intended density.

This provides an opportunity to ensure that roads, drainage, water supply, sewerage, landscaping, open space, pedestrian connections and other infrastructure are appropriately designed before residents move into the area.

By contrast, progressively subdividing established residential blocks can create a situation where infrastructure and the surrounding street network are required to accommodate a level of density they were never designed for.

9. Request for a proper assessment of cumulative impacts

I am particularly concerned that the impacts of this proposal may appear relatively minor when considered subdivision by subdivision, while becoming significant when considered across an entire established suburb.

I therefore ask that the Planning Commission consider the cumulative impacts of the amendment, including:

- additional dwelling numbers;
- traffic generation;
- parking demand;
- road capacity;
- water pressure and water supply capacity;
- sewerage capacity;
- stormwater management;
- electricity infrastructure;
- loss of mature trees and canopy;
- urban heat;
- airflow;
- noise;
- privacy;
- residential amenity; and
- the long-term character of established northern suburbs.

Conclusion

I strongly object to Planning Scheme Amendment PA2026/0205.

I support sensible and sustainable housing growth in Darwin, but I do not believe that substantially increasing subdivision potential across established low-density residential suburbs is the appropriate way to achieve it.

The established northern suburbs provide a particular form of residential environment that many residents have deliberately chosen and, in many cases, paid a premium to obtain. That character includes mature trees, leafy streets, relatively low density, established gardens, quiet residential roads and the amenity associated with larger blocks.

The proposed amendment risks progressively removing those qualities without demonstrating that the resulting increase in density can be adequately supported by

existing infrastructure or that the environmental and amenity impacts can be effectively managed.

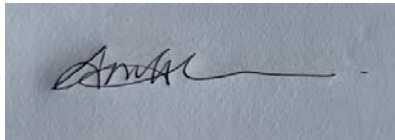
I respectfully request that the proposed amendment **not proceed**.

At a minimum, before any amendment is approved, I request that the Government undertake and publicly release detailed assessments of infrastructure capacity, traffic and parking impacts, tree canopy and vegetation loss, urban heat, stormwater, sewerage, water supply and the cumulative impacts of increased density across established northern suburbs.

I ask the Planning Commission to give significant weight to the concerns of existing residents who will live with the long-term consequences of these planning changes.

Kind regards, .

Signed:

A photograph of a handwritten signature in black ink on a light blue background. The signature appears to be 'Amber Harford' written in a cursive, flowing style.

Amber Harford



Wulagi NT 0812

I provide the following comments in relation to the proposed infill planning scheme amendment PA2026/0205

In relation to the summary of proposed amendments:

- Oppose the 10% variation to the minimum lot size. The reduction in minimum lot size from 800m² to 450m² is already substantial. A 10% variation would also be less than the 5% variation already allowed for LR subdivision generally under Clause 6.2.1(1)(a) of the NT planning scheme. Suggest that the ability to vary is either Nil or carry through the existing 5%. LR lots for infill in older suburbs should not be smaller than LR lots in greenfield areas.
- oppose dwelling-group and dwelling-multiple being able to be considered in Zone LR. There is already a zone for this, Zone LMR, that allows consideration of this type of development and the land should be rezoned to this if the desired outcome is more than one dwelling on a property. Allowing it in Zone LR is against the purpose of the zone and is a sneaky non-transparent way of allowing a much higher density. It also means that there is no longer a zone just for dwellings-single and 'actual low density'.
- Oppose a minimum 450m² dwelling as part of a dwelling-group or dwelling multiple allowing up to a 10% variation. Again for the above reasons and there is a zone for more than one dwelling on a property in lower density areas, Zone LMR.
- Oppose reducing minimum lot frontages. Currently cars struggle to park on the street in front of properties in new subdivisions due to the limited lot frontage widths. If it is reduced then possibly consider mandating a clear distance between driveways to ensure on street parking.
- Agree that battle axe lots should be allowed in certain circumstances. But what are the circumstances? This should be clearly defined. Also, how does this work with battle axe lots and will there be a separate minimum width for the battle axe driveway?
- Agree that subdivision should be prohibited on land affected by flooding and storm surge. Unsure how it will apply to just the affected portion of the lot? Who ends up with the affected left over bit?
- Disagree with dwelling-group and dwelling-multiple in Zone LR in general. It doesn't matter if it is affected by storm surge or flooding. Instead, zone the land LMR and allow for greater dwelling densities of one per 300m² or 150m² and stop trying to be sneaky about it.

There are much better methods to achieve housing diversity and higher densities in existing suburbs.

The proposed haphazard approach provides no certainty for the community and provides little direction for service providers to appropriately plan for service infrastructure and social infrastructure.

Instead of the infill proposal, look at updating the land use plans to identify localities close to community facilities and commercial areas that can be up-zoned. This will provide the community greater certainty on where intensified development will occur

and allow service and social infrastructure to be appropriately planned for and rolled out creating greater efficiencies.

Building on from this, there seems to be a lack of uptake in areas currently identified by the land use plans for up-zoning and I understand that a lot of this is because of the lack of infrastructure or lack of developer contribution plans in place to inform and allow landowners to take advantage of the opportunities offered by the land use plans. Instead of this haphazard infill approach, the NT government should be focussing their efforts on preparing developer contribution plans to help unlock the areas already identified for up-zoning.

The proposal does not increase housing diversity and opportunities as it claims. Rather it reduces the amount of larger lots available for those with larger families looking for the good old fashioned 1/4 acre lot. We know that 900m²+ lots are a thing of the past and new development does not provide for larger lots. Retaining the older lot sizes and the lifestyle they bring can be the point of difference that makes living in the Territory more attractive than being crammed in like in other jurisdictions.

Land is not that scarce in the Territory that we need to be impinging on our older suburbs in a haphazard way.

Yours Sincerely,

Babette A Willis

A black rectangular redaction box covering the signature of Babette A Willis.

21 August 2026

Re: Submission on Planning Scheme Amendment PA2026/0205 – Zone LR (Low Density Residential)

To whom it may concern,

I am writing as a resident of Tiwi, Darwin, to object to Planning Scheme Amendment PA2026/0205, which proposes to reduce the minimum standard subdivision lot size in Zone LR from 800 m² to 450 m², and to permit dwelling-groups and independent secondary dwellings within the zone.

I live on a 1350 m² block in a suburb known for its generous block sizes. Tiwi, like Parap, Fannie Bay, the Narrows, Rapid Creek and Nightcliff, is a post-cyclone rebuild suburb with a distinct character – established trees, real space between houses, and backyards big enough for kids to actually play in. My roof doesn't come close to touching my neighbour's roof or fence, and that space is not incidental, it is exactly what gives these older northern suburbs their identity and liveability.

That space is also what people mean when they talk about the "Territory lifestyle" - a proper backyard, room to move, not being on top of your neighbours. It's what I grew up with in Darwin and what I want for my own kids. A 450 m² lot does not deliver that. It delivers a small patch of grass neighbours being on top of one another. I find it hard to reconcile a government that talks about restoring the Territory lifestyle with a planning amendment that would carve up exactly the kind of block that lifestyle depends on.

I also don't accept the premise that subdividing established blocks is the answer to housing options. Squeezing more dwellings onto existing Zone LR lots does nothing to address the actual drivers of the housing shortage – land supply at the greenfield end, construction costs, interest rates and wages – and there is no guarantee that new dwellings created through subdivision will genuinely broaden housing options rather than simply eroding the amenity of established suburbs while the underlying problem remains unsolved.

My specific concerns with the amendment are:

1. Loss of neighbourhood character

Suburbs like Tiwi have a genuine, place-specific character built up since the post-Tracy rebuild. Halving the minimum lot size doesn't create new character, it erodes what's already there – the spacing, the greenery, the sense of room to breathe.

2. Tree loss and green space

Larger blocks in these suburbs currently support mature trees and substantial green space. Smaller lots with higher site coverage will inevitably mean fewer trees and less permeable land, with flow-on effects for local cooling and amenity.

3. Traffic and parking on narrow streets

Many streets in these older suburbs are already narrow and were never designed for higher dwelling density. More dwellings per block means more cars and traffic, and I don't believe these streets can absorb that without real congestion and safety problems.

4. Drainage

Drainage infrastructure in older suburbs like mine is already known to be inadequate. Increasing dwelling density and hard surface area on these blocks, without any evident upgrade to drainage infrastructure, will make existing flooding and stormwater issues worse, not better.

5. Backyard space for families

A core part of the appeal of these suburbs is being able to raise kids with a proper backyard to play in. Reducing lot sizes to 450 m² removes that option for future residents and changes the fundamental nature of what these blocks can offer families.

For these reasons, I ask that the Commission not support PA2026/0205 in its current form, particularly as it applies to established character suburbs such as Parap, Fannie Bay, the Narrows, Rapid Creek and Nightcliff. If the goal is genuinely to broaden housing options, that requires a broader strategy than

subdividing existing blocks – and it should be accompanied by a proper suburb-by-suburb assessment of drainage capacity, street width and tree canopy impact, rather than a blanket Territory-wide reduction in minimum lot size.

Regards

A handwritten signature in black ink, appearing to be 'Emily Banks', enclosed within a faint rectangular border.

Emily Banks

Subject:

FW: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

From: Gayle Laidlaw [REDACTED]**Sent:** Thursday, 20 August 2026 9:29 PM**To:** Das NTG <Das.NTG@nt.gov.au>**Subject:** Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

RE: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to express my strong opposition to [Planning Scheme Amendment PA2026/0205](#). While increasing housing options is important, this blanket proposal introduces significant risks without sufficient planning or evidence. My key objections are detailed below:

- **Lack of Infrastructure Assessment:** The amendment relies heavily on existing reticulated water, sewerage, power, stormwater, and road networks without presenting any suburb-by-suburb capacity modeling. Suburb infrastructure in established Territory areas is aging; introducing blanket density increases without prior infrastructure upgrades risks network overload, severe traffic congestion, and delayed, reactive fixes.
- **Flawed "Blanket" Approach vs. Place-Based Planning:** Applying uniform changes across all Zone LR land in the NT ignores local terrain, street layouts, and access to public transport or services. Increased density should be directed through strategic, place-based planning centred around town hubs, rather than an uncoordinated, site-by-site lot size reduction across every suburban street.
- **Unproven Affordability and Supply Benefits:** The explanatory documents assert that smaller lot sizes will solve housing challenges, but fail to provide NT-specific economic data, supply estimates, or pricing models. While reducing minimum lot sizes to 450 m² increases developer yield, it does not guarantee lower sales prices or cheaper rents, as high construction and finance costs remain completely unaddressed by planning rules alone.
- **Loss of Canopy, Neighbourhood Character, and Urban Heat:** Replacing large 800 m² garden blocks with 450 m² lots drastically reduces deep soil zones and mature tree canopies. In a region already prone to severe urban heat island effects, high-density infill without strict canopy preservation rules will raise ambient temperatures, diminish privacy, and permanently erode low-density neighbourhood character.

- **Over-Reliance on Ad-Hoc Assessments:** Strategic infrastructure and amenity concerns are deferred to individual development applications rather than resolved upfront. Case-by-case assessment fails to account for cumulative impacts, such as multiple battle-axe subdivisions on a single street creating ongoing parking, access, and safety issues over time.

For these reasons, I urge the authority to reject the broad application of Amendment PA2026/0205 in favour of a targeted, infrastructure-led, and place-based planning approach.

Thank you for considering this submission.

Gayle Laidlaw

2026-08-20

Submission Opposing Amendment to the NT Planning Scheme 2020

Proposed Amendment to Facilitate Infill Development and Subdivision in Zone LR (Low Density Residential)

Submission from: Belinda Townend

Suburb: Rapid Creek / Nightcliff

Thank you for the opportunity to provide feedback on the LR amendment proposal in the Nightcliff/Rapid Creek locality. Please find my submission below.

I strongly object to the proposed amendment to the Northern Territory Planning Scheme 2020 that would reduce minimum lot sizes in Zone LR and permit additional housing typologies such as duplexes, townhouses and battle-axe subdivisions.

The proposal fundamentally changes the purpose and character of Zone LR neighbourhoods without demonstrating that supporting infrastructure, road networks, parking provision, environmental assets and community facilities have the capacity to accommodate substantial increases in population density.

Rapid Creek and Nightcliff are valued precisely because they are low-density, leafy suburbs characterised by large blocks, mature trees, open space, breezeways and a unique tropical lifestyle. These qualities distinguish the area from newer higher-density suburbs and are a primary reason residents choose to live here.

The proposed amendment risks irreversible impacts on neighbourhood character, urban heat, traffic congestion, parking, infrastructure reliability, stormwater performance and environmental values while providing limited evidence that existing services can support the anticipated increase in dwellings.

1. Loss of Neighbourhood Character

The Planning Scheme identifies the importance of maintaining the intended character of zones. The fundamental purpose of Zone LR is low-density residential living.

Reducing lot sizes from current standards and introducing townhouses, duplexes and battle-axe developments is not a minor adjustment. It represents a significant shift in planning policy and effectively transforms established low-density suburbs into medium-density residential areas without a comprehensive local structure plan.

Rapid Creek and Nightcliff are known for:

- Large residential blocks
- Significant tree canopy
- Spacious setbacks
- Tropical gardens
- Natural ventilation corridors
- Lower traffic volumes
- Open streetscapes

These attributes cannot be recreated once lost.

Residents did not choose to live in Rapid Creek or Nightcliff because they wanted suburban densities comparable to Lyons, Muirhead or newer master-planned developments. They chose these locations because they offer a distinctly different character and lifestyle.

Once subdivision occurs, that character loss is permanent and cumulative.

2. Existing Infrastructure Is Already Under Stress

The amendment appears to assume infrastructure capacity exists to absorb significant additional residential density. However, local experience suggests otherwise.

In our cul-de-sac alone, water infrastructure failures have occurred on multiple occasions in recent years, with at least three water main failures in approximately five years.

This raises serious questions regarding:

- Water supply capacity
- Ageing underground infrastructure
- Asset condition
- Future maintenance requirements
- System resilience during peak demand

Before increasing residential densities across Zone LR suburbs, the Government should first publish:

- Water capacity assessments
- Sewerage capacity assessments
- Stormwater modelling
- Traffic impact studies
- Infrastructure upgrade plans
- Cost estimates and funding commitments

The NT Planning Commission's review itself identified infrastructure as a key issue raised during consultation, acknowledging concerns regarding enabling infrastructure to support additional development.

Planning reform should follow infrastructure delivery, not precede it.

3. Increased Traffic and Road Safety Impacts

Many streets within Rapid Creek and Nightcliff were never designed to accommodate substantial increases in residential density.

Additional dwellings inevitably generate:

- More vehicles
- More visitor parking demand
- Increased service vehicle movements
- Increased garbage collection traffic
- More pressure on already constrained intersections

Many local roads feature:

- Narrow carriageways
- Limited verge space
- Informal parking patterns
- Pedestrian activity
- Cyclists
- Recreational users

No publicly available traffic modelling or infrastructure capacity assessment has been provided to residents as part of this amendment process demonstrating that local roads, parking and services can accommodate the cumulative impacts of increased density in established Zone LR suburbs.

Without such evidence, approving this amendment would be premature.

4. Existing Parking Problems Will Worsen

Parking is already a significant issue throughout parts of Nightcliff and Rapid Creek.

More dwellings on smaller lots typically result in:

- More on-street parking
- Reduced visitor parking availability
- Vehicles parked on verges – which becomes a council by-law issue
- Reduced sight lines
- Increased conflict between road users

The proposal effectively transfers parking impacts from private land onto public streets.

The amendment documentation does not appear to adequately address how existing parking shortages will be managed as densities increase.

5. Loss of Mature Trees and Urban Cooling

One of the greatest concerns is the likely removal of mature trees to facilitate subdivision and increased site coverage.

Large residential lots currently support:

- Established canopy trees
- Wildlife habitat
- Urban cooling
- Stormwater infiltration
- Tropical character

Subdivision almost inevitably results in:

- Tree removal
- Increased hard surfaces
- Larger building footprints
- Reduced landscaping
- Greater heat retention

This is particularly concerning in Darwin's climate.

At a time when governments are investing heavily in urban cooling strategies and recognising the importance of tree canopy in mitigating heat impacts, this proposal appears likely to accelerate canopy loss across some of Darwin's most established suburbs.

Once mature trees are removed, replacement trees take decades to provide equivalent environmental benefits.

6. Environmental Impacts on the Rapid Creek and Nightcliff Area

The Rapid Creek and Nightcliff area contains important environmental values and ecological connections.

Increasing residential density will likely result in:

- Greater stormwater runoff
- Reduced permeable surfaces
- Reduced vegetation
- Increased pressure on nearby coastal and creek environments
- Loss of habitat for birds and urban wildlife

The cumulative impact of hundreds of small redevelopment projects may ultimately be greater than a single large development.

These cumulative environmental impacts appear insufficiently assessed.

7. Lack of Evidence Demonstrating Need

While increasing housing supply is a legitimate policy objective, there has been insufficient evidence provided to demonstrate that widespread rezoning-style changes to Zone LR are the most appropriate solution.

The Government has not demonstrated:

- Why existing higher-density zones cannot accommodate forecast growth.
- Why vacant and underutilised land should not be prioritised first.
- Why strategic growth areas should not absorb additional density.
- Why established low-density suburbs should bear the burden of housing targets.

A "one-size-fits-all" approach across the Territory fails to recognise the unique characteristics of suburbs such as Rapid Creek and Nightcliff.

8. Community Expectations and Social Licence

People purchase homes in Zone LR with a legitimate expectation that the low-density character of the area will be maintained.

While planning controls may evolve over time, significant shifts in development intensity should only occur following detailed localised planning studies, not broad Territory-wide amendments.

The fact that a neighbourhood consists of large blocks should not automatically justify their subdivision.

Large blocks are a defining feature of the area, not a planning problem to be solved.

Conclusion

I strongly object to the proposed amendment.

The proposal prioritises increased residential yield without adequately demonstrating:

- Infrastructure capacity
- Road network capability
- Parking availability
- Environmental protection
- Urban canopy retention
- Maintenance of neighbourhood character

Rapid Creek and Nightcliff are among Darwin's most desirable suburbs precisely because of their spacious, leafy and low-density character. Once these qualities are eroded through subdivision and increased density, they cannot be recovered.

I respectfully request that the Minister reject the amendment.

Housing growth should occur in locations specifically planned and serviced for increased density, not through the incremental degradation of established low-density neighbourhoods.

The amendment is also not supported because no detailed, publicly available, suburb-specific assessment has been released demonstrating that existing roads, intersections, parking, water, sewer, drainage and community infrastructure in Rapid Creek and Nightcliff can accommodate the cumulative impacts of additional dwellings. The Commission's own report acknowledges significant community concerns

regarding infrastructure capacity and records advice from Power and Water Corporation that density increases in older suburbs may require substantial infrastructure upgrades.

While infrastructure capacity is a significant concern, my objection is not contingent on infrastructure upgrades. Even if roads, water, sewer and power networks could accommodate additional dwellings, I do not support the proposal because it fundamentally alters the character and purpose of Zone LR neighbourhoods. Rapid Creek and Nightcliff are valued for their large blocks, mature trees, spacious streetscapes, tropical gardens and low-density residential character. These attributes are not deficiencies that require correction; they are the very qualities that residents seek out and wish to preserve.

The justification for this amendment appears to be that large blocks represent an opportunity for further development. I take the opposite view. The large lot pattern, established vegetation and open character of Rapid Creek and Nightcliff are planning assets that should be protected, not gradually eroded through subdivision and densification.

The proposal assumes that increased density is inherently beneficial. However, planning should recognise that diversity of neighbourhood types is also important. Darwin already contains higher-density and master-planned suburbs designed to accommodate growth. Not every suburb should evolve toward the same development pattern. Rapid Creek and Nightcliff provide a distinct residential character within Darwin and that distinction should be retained.

The question is not whether Rapid Creek and Nightcliff can be made denser. The question is whether they should be. In my view, the qualities that make these suburbs desirable today would be diminished by the very changes this amendment seeks to encourage.

I therefore object to the proposed amendment in its entirety.

Thank you for considering this proposal.

Kind regards,

Belinda Townend

To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Name: Nicholas O’Loughlin (Nick)

Suburb: Jingili NT 0810

Email: [REDACTED]

RE: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to lodge a formal submission regarding proposed Planning Scheme Amendment PA2026/0205. While I recognise the need for diverse housing options in the Northern Territory, I have strong concerns regarding the blanket implementation of 450 m² minimum lot sizes and battle-axe subdivisions in Zone LR without adequate evidentiary support.

My key concerns are as follows:

1. Infrastructure Constraints:

I am a long-time resident of Darwin and was an apprentice carpenter and joiner when Karama was built in the early 1980’s. At the time the talk was that the power supply wasn’t good enough to plug a welder in. I don’t know if this was true or not, but what is true is that the power, water, sewer and stormwater services have not been upgraded since their original construction. Other older suburbs have older infrastructure and a detailed analysis should be required prior to proposed planning changes to add to the load. After falling off a motorbike in 1984 I became a quantity surveyor and am aware of the can of worms associated with headworks on new developments. Early developments may pay the full cost of headworks upgrades or they could avoid them entirely pending the planning rules at the time. I believe the approach to payment of headworks should be considered, planned and the cost equally shared rather than allowing an ad hoc approach. I currently lease a house in Malak and for the second time we have reported a water leak on the Power Water side which is yet to be fixed. The landlord has had leaks to fix in the past too, but these are repaired quickly as leaking water can get expensive and cause damage to substructures and surfaces. I do not believe blanket subdivisions are a good idea if we struggle maintaining our existing finite infrastructure.

2. Neighbourhood Character and Tree Canopy:

There will be shade loss with infilling and this will add to increased heat loads and reduced air movement. I am thankful to live in an elevated home built in 1969 with excellent passive design features. Removing tree cover and building ground level

blockwork homes with closed windows and air conditioning increases hot air being pumped out into the remaining trafficable spaces. This is not a good outcome on a heating planet where we are getting more days over 35 degrees with high humidity. The human body cannot perspire to cool in these conditions and increased building density will lead to increased heating, human harm and death. An increase in heat stress and heat stroke is a serious consideration and not conducive to increased liveability which should be our top priority in a world increasingly looking around for safety and a good place to live. Darwin/NT will be a better and highly sought after destination if our neighbourhood character and tree canopy can be enhance with consideration to good passive design.

3. Strategic vs. Blanket Infill:

It would be preferable to have targeted density near town centres along service corridors rather than have a blanket territory-wide reduction to 450 m². Strategic planning is sensible planning as consideration and contingencies can be made to include for unforeseen items always associated with work involving existing underground services.

Recommendation:

I request that the Minister defer approval of PA2026/0205 until:

- Detailed infrastructure capacity assessments are conducted for each Zone LR locality.
- Place-based infill plans are developed in consultation with local communities.
- Strict tree canopy retention standards and urban heat mitigation rules are integrated into the amendment text.

Thank you for considering this submission.

Date: 21 August 2026

Signed: Nick O'Loughlin

Planning Development Feedback.

I am largely supportive of the proposed changes to dwelling density from 800sqm to 450sqm and the associated adjustments to building setbacks. I support gentle density increases to existing developed areas over developments in green field locations; coming at a critical time when new developments are occurring in older suburbs. I do however hold concern for the loss of landscaping and tree canopy on smaller lots and think the code should protect this space.

I support the subdivision of larger blocks to 450sqm, and the current development scheme permitted construction of dwelling-single and dwelling-independent on LR and LMR blocks. Constructing this on a block of 450sqm down to 405sqm is challenging but, with good design is possible. And there is merit in allowing this combination, creating more dwellings of smaller sizes.

- Studios and two-bedroom dwellings with access to private yard spaces are uncommon and provide a suitable option for residents with pets; when compared to apartments.
- Independent dwellings provide additional choice for Darwin's transient workforce / population.
- Increased smaller dwelling supply reduces house sharing and hence pressure on the price of renting a family sized home.

I do have a concern that main and independent dwellings on a small block will lead to houses being built to cover the entire buildable envelope (encroaching up to each setback). This creates suburbs that are a 'sea of roofs' and have no tall trees, limited stormwater infiltration and urban cooling. I do not support this outcome and believe should be prevented.

The goal of a house should be different than an apartment. Preserving green space for: large trees, vegetable gardens, native gardens and places for pets and family to be outside is important for maintaining the lifestyle and neighbourhood amenity of living in a house.

Current planning scheme controls this using private open space for each dwelling. Detailed in Clause 5.4.6 and Table 5.4.6.1. The listed required size is appropriate for a main and independent dwelling, totalling of 90sqm-95sqm 'Area A' open to the sky. However, the minimum dimension of 1.5m is not sufficient. At 1.5m the space operates more like a setback rather than a suitable space for planting tall trees, or green walls and vegetable gardens.

Increasing the minimum dimension to 2.5 - 3m supports both in the spirit of a house yard and allows for usable green yards. This replicates the method used for 'Area B', ensuring any nominated area is sufficiently sized to support ground for tall trees, water infiltration, urban cooling, outdoor activity and lifestyle.

In summary, I support the proposed density changes for the planning scheme. Reducing minimum dwelling space and lot sizes as a response for meeting Darwin's housing needs without sprawl. However, I encourage the amendment to be supported by stronger private open space dimensional requirements to ensure density increase is achieved while maintaining tree canopy, landscaping opportunities and neighbourhood amenity that makes detached housing desirable.

From: [REDACTED]
To: [NTPlanning Commission](#)
Subject: Submission to PA2026/0205
Date: Friday, 21 August 2026 12:41:39 PM

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Submission to PA2026/0205

PA2026/0205 proposes substantial changes to Zone LR, including reducing the minimum lot size from 800m² to 450m² and allowing dwelling-group and dwelling-multiple developments.

This proposal was presented in July 2016 by the fag-end of the CLP governments last effort to administer the NT. All the arguments against the proposal still stand except that the reasons have become more acute and opposition more necessary.

I believe that the Planning Scheme should not be amended across all Zone LR land without first assessing the cumulative impacts on infrastructure and services.

Subdivision will lead to more hard surfaces and heat-radiating roofs and less tree canopy and vegetation. This means more heat is absorbed and radiated from built surfaces, while less shade and natural cooling is provided by trees and vegetation, increasing urban heat.

Subdivision will also lead to the destruction of wildlife habitat, decrease breeding opportunities and destroy food chains and continue the species decline Australia is famous for.

Darwin's Fire free native gardens provide a refuge for native animals and birds. There are many hundreds of these gardens in the COD Native Garden initiative.

The City of Darwin's Greening Darwin Strategy 2030 and Climate Emergency Strategy 2030, together with the NT Planning Scheme's landscaping and private open space provisions, recognise the importance of tree canopy, vegetation and permeable ground in reducing urban heat and managing stormwater runoff.

Exhibited documents repeatedly say that infrastructure and other impacts can be considered later. Responsibility for identifying and responding to the cumulative impacts is then left to service providers, local government and the community, one application at a time.

Darwin's neighbourhood character is unlikely to be maintained as claimed. Suburban character results from tropical-designed elevated homes on large, vegetated blocks. If these are progressively replaced by smaller blocks with more dwellings, more roofs, driveways and parking areas, and less vegetation and tree canopy, Darwin's neighbourhood character will inevitably be destroyed.

Spot zoning and multiple occupancy is already available to house holders and developers. We need not encourage down south developers and investors with no interest in the NT's much coveted "lifestyle" to interfere for personal gain from unaffordable rents.

Darwin desperately needs affordable housing. Maybe the merits of 'Granny Flats' should be considered before this ad hoc, tired old rehash of an idea is introduced.

PA2026/0205 should therefore be refused until the cumulative impacts of the proposed changes are fully investigated.

Graham Kirby. Chan Ward Nightcliff.

PS. Is this the correct address please acknowledge.

[REDACTED]

From: Kate Dixon [REDACTED]
Sent: Friday, 21 August 2026 10:55 AM
To: Das NTG
Cc: office@nt.greens.org.au; Electorate Nightcliff
Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Name: Kate Dixon

[REDACTED] Nightcliff

Email: [REDACTED]

RE: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I hereby lodge a formal submission regarding proposed Planning Scheme Amendment PA2026/0205. For clarity **I oppose PA2026/0205** in its current form.

I have strong concerns regarding the blanket implementation of 450 m² minimum lot sizes and battle-axe subdivisions in Zone LR without adequate evidentiary support.

My key concerns are as follows:

1. Infrastructure Constraints:

I am concerned about the ability of existing aging suburban infrastructure to cope with the density of the population that the rezoning proposal would bring to Nightcliff. Already there is periodic local flooding and power outages across the suburb, as well as traffic congestion and parking issues particularly where all the apartment blocks already exist. Upgrades are already warranted without the added pressures of extensive density increases.

In 2012, the Darwin Harbour and Water Quality Task Force examining the causes of several major beach pollution events, identified that big storm events which typically happen late in the dry season, had sent large volumes of sewerage directly into the harbour, resulting in extensive bacterial blooms across the northern beaches, and necessitating beach closures. The sewerage incursions were attributed at least in part, to anomalies in upstream stormwater and sewerage pipe configurations. Without extensive surveying and remedying, the risk to water quality is likely still present.

I personally have seen multiple times, Casuarina Beach littered with large quantities of dog poo all along the high tide mark following big storm events. This volume of dog poo doesn't appear to be present on the beach normally, so is likely flushed from the storm water system by storms.

With an increase in human density, the aging stormwater system will inevitably cause increased beach and water pollution events following storms, creating risk to Darwin's reputation during the tourist season.

There should be no substantial new developments before a full upgrade of the sewerage and stormwater systems is undertaken. Such an upgrade should be built into the cost of new developments.

2. Neighbourhood Character and Tree Canopy:

Nightcliff is a gracious leafy suburb, that is perhaps its greatest appeal (after the beautiful coastal location). It is a pleasure to wander around the suburb of an evening. The leafier streets are both aesthetically more pleasing and noticeably cooler than the less treed streets of the suburb. Many of the most beautiful parts of the suburb are in the designated subdivision zone. If left to the discretion of developers I have no faith the retention of mature trees or tree canopy cover, deep soil that supports big trees, or the minimisation of hard heat-radiating surfaces would be prioritised. My expectation with the rezoning as currently proposed is that local ambient heat would increase, with all of the secondary impacts on people's health and wellbeing we know follow.

When I first moved to 17 gardenia street in 2011, there were no large trees on my block other than palms and there were significant exposed hard surfaces (roof, driveway, paved areas). The ambient temperature on my block and inside my house was at least 5 degrees hotter than it is now. At night, the pavers and driveway, acting as a heat sink, radiated the heat into my home till well after dark. Today's lower temperatures are due to trees shading the hard surfaces. The cooler ambient temperature allows me to passively cool my house using through-flow air, and to lower my power bills. Additionally, my home is now very private with limited ability for passers by to see in, due to the size of the block and all the trees. This allows me the freedom to spend a lot of time outdoors whilst retaining privacy. Comfortable outdoor living is a core characteristic of living in Nightcliff and would be severely compromised by blanket density increases, due to loss of mature shade trees, and less privacy for residents.

Recommendation:

I request that the Minister defer approval of PA2026/0205 until:

- Detailed infrastructure capacity assessments are conducted for each Zone LR locality.
- Place-based infill plans are developed in consultation with local communities.
- Strict tree canopy retention standards and urban heat mitigation rules are integrated into the amendment text.

Thank you for considering this submission.

Date: 20 August 2026

Signed


:

[REDACTED]

From: Jane Aagaard [REDACTED]
Sent: Friday, 21 August 2026 2:03 PM
To: Das NTG
Subject: Planning scheme proposed changes PA2026/0205

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

> Dear Planning Commission

> I write to you in relation to proposed changes to the Planning Act which would allow more than one single dwelling on properties as small as 900 sq metres.

> I think planning in Darwin is already very messy and we see many bad results across the city as a result.

> If this is implemented one of the key issues will be the lack of infrastructure to sustain it. The sewerage and water services are already quite poor with water pressure quite low in many of the older suburbs including Nightcliff and Rapid Creek where I live, largely because there has been a have failure to increase or improve these facilities over a long period of time. I see this as a major issue which will directly impact on the quality of our lives in our older suburbs.

> Similarly, 450sqm does not allow for much or perhaps any parking and we will see a repeat of the ridiculous parking situation in places like Tipperary Waters where there is insufficient parking in unit blocks and so whole streets are filled with cars making it very difficult to navigate through. This is already happening in some parts of Casuarina Drive, Nightcliff.

> The increase in population in the area from say a single dwelling with two cars and four people to four cars and eight or more people puts pressure on other services like schools and community infrastructure like parks and footpaths and also increases noise in the area, generally taking away from the amenity of the area.

> Similarly, the whole nature of our suburbs will change from a very desirable older leafy suburb to a concrete jungle overflowing with cars and people with little room for gardens. This is not desirable in a hot tropical city. It is particularly unreasonable for those who do not want to be part of it. The house and land purchased in desirable areas can suddenly change with no reference to people living in the area.

> I disagree with the proposal. I am happy to be contacted by email at [REDACTED] or by phone at [REDACTED]

> Kind regards

> The Hon Jane Aagaard AM

> Sent from my iPad

* ALSO COUNCIL: TAKEN RAPID CK. PARK, VALDER CRES. 6
CAR PARKING, NOW A STUDENT CAR PARK, FROM
MAINLY RETIRED USERS, SOME WITH PETS.
CHAPMAN RD LAND? UNUSED.

1 CLP GOVT - TODAY'S UNQUALIFIED PLANNERS TO
CHANGE DARWINS LIVEABILITY (EASY TO LIVE WITH)

2 ABSOLUTELY NO CONTACT WITH RESIDENTS:-
PRIVATE LAND OWNERS, MAINTAINERS OF
THE COOL INVITING SUBURBS AT THEIR OWN
EXPENSE

3 ACCESS ROADS TRAFFIC QUADRUPLD + PEAK TIMES

4 • NIGHTCLIFF RD (A ROAD IN NAME ONLY) (50 kmh, MAX.
NOT MONITORED) STOP START, PEAK TIMES;
NO RESIDENT ACCESS IS THE RULE BY OTHER ROAD
USERS. HOW ABOUT AN AMBULANCE?

5 • TROWER ROAD

6 • PROGRESS DRIVE

7 ALL THESE ROADS WILL HAVE TO SERVICE A TRAFFIC
INCREASE OF 4 TIMES, THE HIGH DENSITY
DEVELOPMENT, PLANNING? SCHEME

8 SERVICES TO BE UPDATED WATER
(STREET LIGHTING) ELECTRICITY (UNDERGROUND)
SEWERAGE
POSTAL SERVICES
STORM DRAINAGE
PHONE TOWER

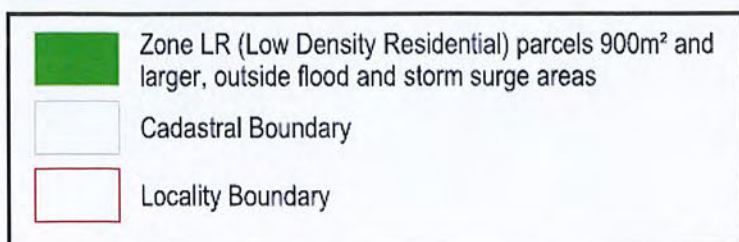
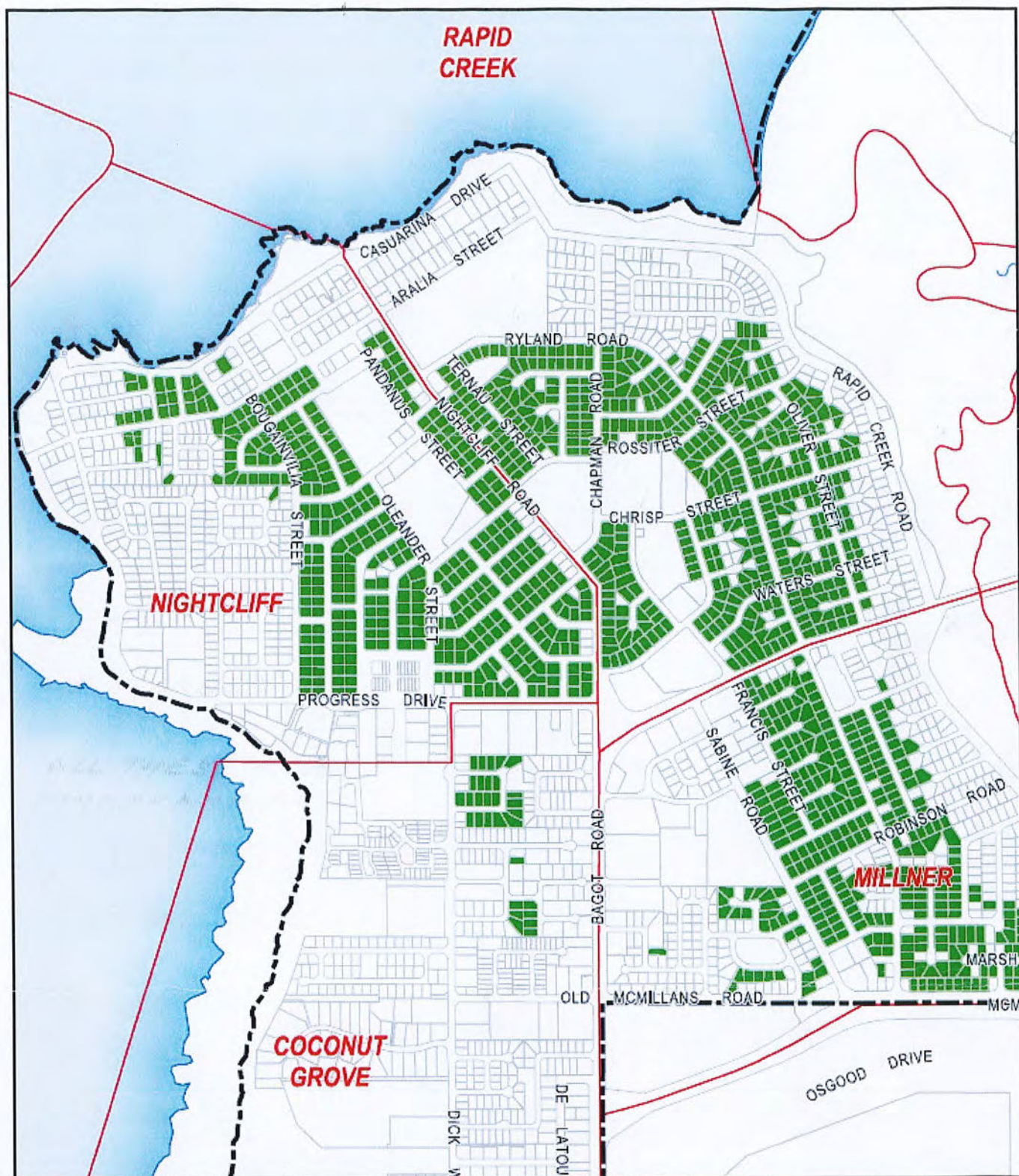
9 ON STREET CAR PARKING HUGE INCREASE
(COUNCIL ALLOWS FOOT PATH)

10 AIR POLLUTION DENSITY INCREASE

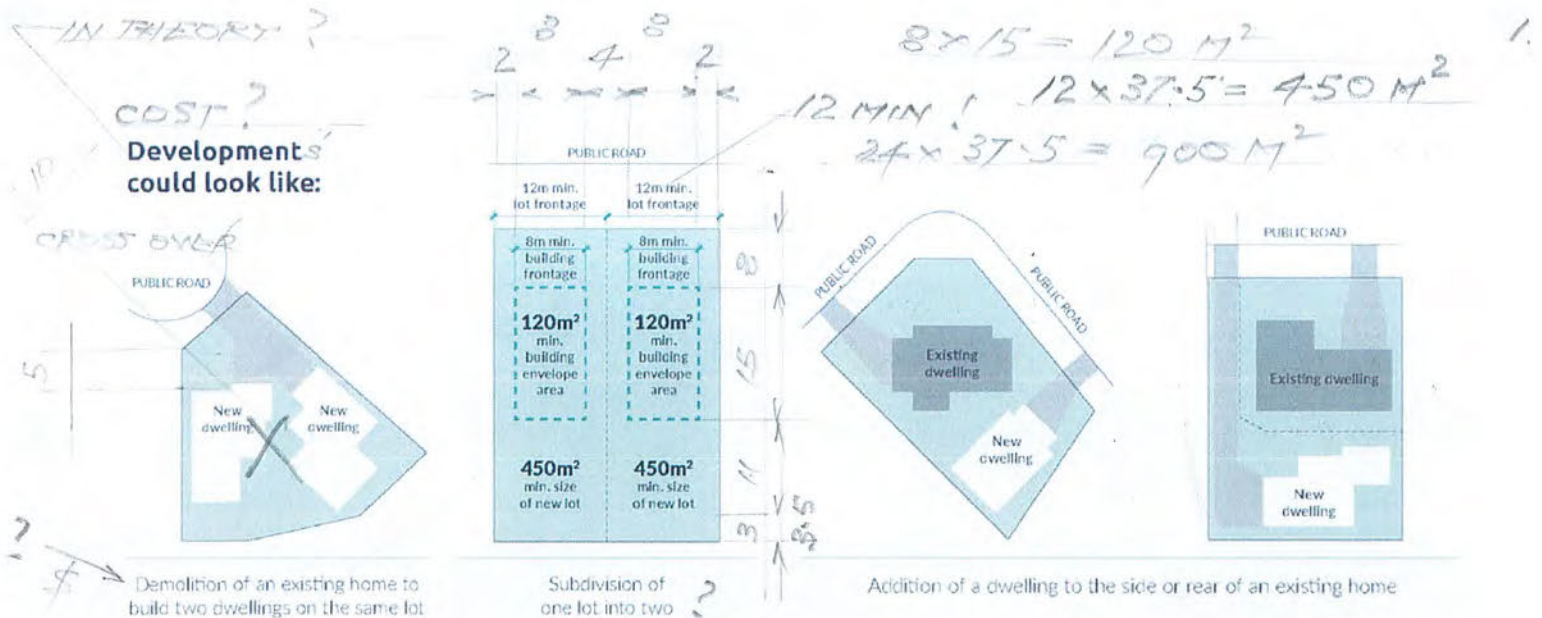
11 PLAY AREAS FOR CHILDREN

12 SHOPPING NOT AS EASY

13 BIRD LIFE IN EXISTING TREES AREA - GONE



Source: NT Land Information System - Planning Notices Online



Source: NTC/Discussion Paper - Infill Development and Subdivision

CARS? ? DEMOLITION, ELEMENT(S), PARKING, CROSS-OVERS

SQUARE

1600 M²

(10 x 10)

3.05 x 3.05

9.302 M²

120 M²

9.302 M²

= 12.9

16.00

- 12.90

3.10

www.nttis.nt.gov.au/planning-notices-online/notices#/index

You also have until August 21 to provide feedback to the government via this link:

If these proposed changes concern you or you support them, let me know at electorate.nightcliff@nt.gov.au

This could significantly change the character of Nightcliff, Rapid Creek and Coconut Grove.

The proposed changes will see minimum lot sizes reduced to 450 square metres, allowing two dwellings to be built on large residential blocks.

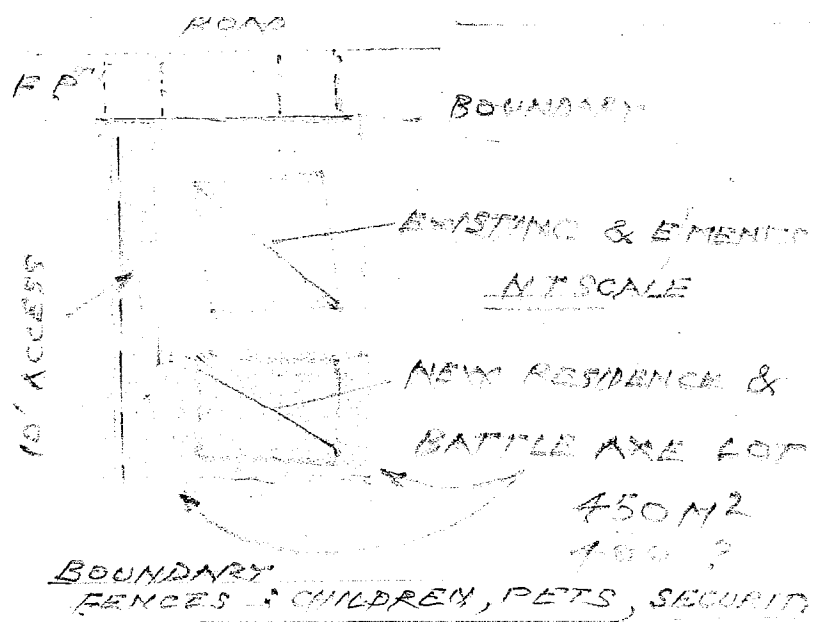
Did you know the CLP Government is intending to change the Planning Scheme to allow more suburban blocks to be divided?

ADD COVER NEW FACILITIES COST?

Every Territorian deserves a say on changes in their neighbourhood.

Ed Smelt MLA

Member for Nightcliff
Deputy Leader of the Opposition



KEEPING A LOW PROFILE :-
NT GOVT. PROPOSAL TO REPLACE
LOW DENSITY RESIDENTIAL
NEIGHBORHOODS ACROSS NT, IS :
PLANNING SCHEME AMENDMENT
PA 2026/0205

COMMUNITY AND PUBLIC VOICES
OF OBJECTIONS NOT ENCOURAGED
OR VALUED (DEVELOPER DONATIONS)

Honourable Minister,

Minister for Lands, Planning and Environment

Submission in Support of the Proposed Planning Scheme Amendment

I support the proposed amendment to the Northern Territory Planning Scheme 2020 to facilitate infill development and subdivision in Zone LR (Low Density Residential).

The amendment is a practical, measured response to the need for more housing choice in the Northern Territory. It creates new housing opportunities in established residential areas while preserving a suitable assessment framework for neighbourhood amenity, infrastructure, site constraints and environmental risks.

Supporting housing supply and diversity

Current Zone LR provisions significantly restrict housing options in established low-density residential areas. Most land is limited to one dwelling, and subdivision in established neighbourhoods generally requires a minimum lot size of 800 m². The exhibited material shows that these controls limit the capacity of existing suburbs to meet changing household needs and provide smaller or alternative housing forms.

I support reducing the minimum lot size in Zone LR from 800 m² to 450 m². This 450 m² minimum already applies to Zone LR land in greenfield areas and offers a suitable middle-ground lot size between larger traditional Zone LR lots and the 300 m² minimum in Zone LMR.

The change could unlock additional housing on land already located in established communities and, in many cases, already served by roads, utilities and community infrastructure. It is a sensible complement to continued greenfield land release, not a substitute for it.

Using existing urban land more efficiently

Infill development is an important part of a balanced housing strategy. Established suburbs already contain substantial public and private investment in infrastructure and services. Allowing appropriate additional housing in these areas can make better use of that investment and provide homes close to jobs, services and community facilities.

The indicative mapping also shows Zone LR properties of 900 m² or more across various Territory communities that may benefit from the changes. However, the documentation properly clarifies that the maps do not determine whether an individual property can be subdivided or developed. Site configuration, access, infrastructure and other planning requirements will still apply.

This distinction is important. The amendment creates an opportunity to seek development approval; it does not automatically allow every Zone LR property to be intensified.

Expanding housing diversity

I particularly support the proposal to make dwelling-group and dwelling-multiple development merit assessable in Zone LR rather than prohibited.

Housing needs vary. A planning framework that largely limits established low-density residential areas to one conventional house per lot restricts the housing stock's ability to adapt to changing household sizes, affordability pressures and preferences.

Under the amendment, dwelling-group and dwelling-multiple developments would require a development permit and assessment against the NT Planning Scheme. Relevant considerations would still include building design, setbacks, height, site coverage and consistency with the purpose and outcomes of Zone LR. The existing 8.5 metre height limit would also remain.

This provides a reasonable balance between enabling additional housing forms and ensuring that development remains compatible with a low-density residential environment.

Managing development intensity appropriately

I also support the proposed maximum density of one dwelling per 450 m² of site area and the proposed limit on variations to that density.

Linking dwelling density to the proposed minimum lot size provides a logical and transparent control on development intensity. Importantly, the proposed 10 per cent maximum variation would establish a clear limit on the discretion available to the consent authority, with a maximum potential density of one dwelling per 405 m² where a variation can be justified.

This gives landowners and developers some flexibility to respond to individual site circumstances without creating open-ended opportunities for substantially greater density.

Workable subdivision provisions

I support the related changes intended to make subdivision more workable in established areas, including reducing the minimum frontage for lots between 450 m² and 600 m² from 13 m to 12 m and allowing battle-axe lots in limited circumstances.

Established suburbs were generally not originally designed with future subdivision to 450 m² lots in mind. Applying standards designed primarily around new greenfield subdivisions could therefore unnecessarily prevent otherwise suitable infill development.

A 12 m frontage is proposed on the basis that it can still accommodate vehicle access, servicing and a functional building envelope.

Similarly, allowing battle-axe subdivision where site configuration makes it necessary or where it enables an existing dwelling to be retained is a practical response to the physical characteristics of established properties. The proposal retains safeguards, including requiring the minimum lot area to be provided in addition to the access strip and excluding battle-axe lots from the reduced setback provisions applying to smaller conventional lots.

These provisions should allow the planning system to respond to real site conditions rather than requiring uniform subdivision layouts regardless of context.

Protecting neighbourhood amenity

Supporting greater housing supply does not require abandoning appropriate residential amenity standards.

The amendment retains the development assessment process and the broader requirements of the NT Planning Scheme. Development and subdivision will continue to need to address matters including setbacks, private open space, building design and layout, landscaping and building height. Subdivision, dwelling-group and dwelling-multiple proposals will require development applications and public notification.

The proposed Zone LR outcomes also expressly contemplate dwelling-group and dwelling-multiple development generally of two storeys or less where it contributes to housing diversity in a manner consistent with the amenity of the zone.

These safeguards are important. They provide a mechanism for the impacts of individual developments to be assessed on their merits rather than using a blanket prohibition on particular housing forms as the principal means of controlling development.

Infrastructure considerations

It is reasonable to expect that increased development in established areas may place additional demands on infrastructure. This should be addressed through development assessment and infrastructure planning rather than being a reason to prevent appropriate infill development altogether.

The exhibited material recognises this issue and expressly notes that some sites will be constrained by infrastructure capacity, and that increased development intensity may require upgrades to existing infrastructure, with necessary works borne by the developer. This will entail prior consultation with relevant service authorities for prospective development and project feasibility assessment.

This provides an appropriate basis for considering infrastructure requirements in the context of individual development proposals.

Flood and storm surge risks

I strongly support the precautionary approach proposed for land affected by flooding and storm surge.

The amendment would prohibit subdivision and dwelling-group or dwelling-multiple development on Zone LR land affected by the relevant flooding or storm surge overlays. The stated rationale is to avoid increasing the number of people and properties exposed to known hazards and placing additional pressure on emergency response and evacuation arrangements.

This demonstrates that the amendment is not simply seeking additional housing at any cost. It directs additional development opportunities toward locations where increased residential use can be more appropriately accommodated.

Alignment with strategic planning objectives

The amendment is consistent with the broader objective of providing more diverse housing while making efficient use of existing urban land and infrastructure.

The exhibited material identifies that the NT Planning Scheme strategic framework recognises the need to increase housing diversity, balance housing delivery between greenfield and established areas, provide additional housing opportunities that efficiently use existing infrastructure and services, and cater for a growing and changing population.

The proposed amendment advances those objectives without fundamentally changing the low-density intent of Zone LR.

Conclusion

I support the proposed Planning Scheme Amendment

The amendment provides a sensible opportunity to increase housing supply and diversity by making better use of established residential land. Importantly, it does so through moderate changes rather than wholesale rezoning or unrestricted increases in density.

Reducing the minimum lot size to 450 m², allowing carefully controlled variations, enabling dwelling-group and dwelling-multiple development through merit assessment, introducing a clear density control, providing practical subdivision flexibility and retaining strong controls for amenity and environmental hazards together constitute a balanced package of reforms.

The planning system should allow established suburbs to evolve in response to changing housing needs while ensuring that individual developments remain appropriate to their sites and surroundings. In my view, the proposed amendment achieves an appropriate balance between those objectives.

I therefore support the amendment proceeding and being incorporated into the Northern Territory Planning Scheme 2020.

Israel-Tshepo Kgosiemang, Darwin Resident

21/08/26

RE: Proposed Planning Amendment PA2026/0205 (Zone LR Changes) – Submission by I Redmond

I do not support the Planning Scheme Amendment PA 2026/0205 for Darwin. While increasing housing options is important, this “ad hoc” blanket proposal introduces significant risks without sufficient planning or evidence. My key objections are detailed below:

ENVIRONMENT

- Increased temperatures: Loss of urban canopy and forest will increase temperatures in Darwin.
- Loss of urban wildlife: Reduced suburban habitat from infill development means fewer birds and local wildlife in Darwin suburbs. Little or no area will be left for medium to large trees.

SOCIAL

- Reduced outdoor areas: Children will have less backyard space to play in, and adults will have smaller areas for entertainment and relaxing.
- Loss of local heritage: Tropical gardens and tropical character of Darwin is likely to decline.

ECONOMIC

- Property appeal impacts: Property prices and neighbourhood appeal could be negatively affected in some suburbs.
- Increased energy use: Flow-through ventilation becomes less practical due to noise and privacy considerations from closer neighbours, leading to increased air-conditioning.
- Traffic congestion and parking problems: Problems are expected to worsen in certain areas due to more cars.
- Limited affordability impact: Creating smaller 450 sqm lots will not translate to genuinely affordable houses or rents in some suburbs.
- Lack of Infrastructure Assessment: The amendment relies heavily on existing reticulated water, sewerage, power, stormwater, and road networks without presenting any suburb-by-suburb capacity modelling.

Having limited small areas of medium density residential zones (as what happens now in some suburbs) would be more effective for affordable housing/rentals. Darwin deserves a thoughtful, place-based planning framework rather than a risky, blanket rezoning strategy.

Ian Redmond
Tiwi, Darwin



Submission regarding proposed Planning Scheme Amendment

Infill Development and Subdivision in Zone LR

I am the owner of [REDACTED], East Side, Alice Springs, a Zone LR property of approximately 1,320m².

I support the general objective of increasing housing supply, housing diversity and more efficient use of existing serviced residential land. However, I am concerned about the proposed blanket prohibition on subdivision and dwelling-group or dwelling-multiple development where Zone LR land is affected by the flooding overlay.

Effect of the proposed change

The Explanatory Document identifies a significant change in the treatment of flood-affected land:

- under the current provisions, subdivision on land affected by flooding is 'to be avoided'; but
- under the proposed amendment, subdivision would be 'prohibited' where land is affected by the flooding overlay.

The FAQ further states that if only part of a property is affected by the flooding overlay, the property will not be able to be subdivided under the proposed provisions.

The Explanatory Document acknowledges that this change may limit subdivision opportunities for properties that could otherwise be subdivided under the current rules.

Although an Exceptional Development Permit would remain available, this is not equivalent to the ordinary merit-assessed pathway available to other Zone LR landowners. An EDP requires the applicant to justify allowing development that the Planning Scheme otherwise prohibits.

The amendment would therefore expand subdivision opportunities across Alice Springs while potentially making the position of owners of flood-overlay properties more restrictive than it is at present.

Individual merit assessment

The proposed provisions already require each ordinary subdivision application to be assessed individually. A property's inclusion on the indicative green map does not guarantee that subdivision will be approved.

Each application must still be considered against relevant requirements relating to access, parking, infrastructure capacity, drainage, traffic, amenity, lot configuration and impacts on adjoining properties. An application can be refused if the property or surrounding infrastructure cannot satisfactorily support the proposed development.

Flood-affected properties could be assessed through the same merit-based process, with additional requirements addressing surveyed site levels, predicted flood depth, elevated construction, safe access, flood-resilient services and impacts on flood flows.

If a flood-affected property cannot demonstrate an acceptable and safe outcome, its application can be refused. It is therefore unclear why flood risk cannot be treated as an additional matter for assessment rather than being used to exclude the property from the ordinary application pathway altogether.

Circumstances of [REDACTED] Street

I previously discussed the subdivision potential of [REDACTED] Street with Lands and Planning in Alice Springs. I was advised that, because of the shortage of available residential land in Alice Springs, a properly supported Exceptional Development Permit application was likely to receive favourable consideration.

A more flexible, merit-assessed pathway for flood-affected properties would make the subdivision process clearer, more accessible and more consistent with the broader purpose of this amendment. It would still allow appropriate

flood-related surveying, engineering and safety requirements to be imposed without requiring every proposal to proceed through the exceptional development process.

The property is a large Zone LR block of approximately 1,320m². It is situated at the inland end of [REDACTED] Street, on the corner of [REDACTED] Avenue, away from the river-facing end of [REDACTED] Street. Its corner position and two street frontages may provide suitable options for access and subdivision design.

I have lived in Alice Springs for approximately 50 years and have not observed floodwater affecting [REDACTED] Street or [REDACTED] Street generally, including the end closest to the Todd River.

I recognise that historical observation does not replace formal flood modelling. However, it supports allowing the actual flood characteristics of individual properties to be assessed rather than relying solely on a broad overlay.

The indicative map also appears to include properties along Mills Street. Mills Street runs away from the Todd River in the same manner as [REDACTED] Street, while several nearby streets to its north and south appear to be excluded. This may reflect differences in surveyed elevation or modelled flood extent, but those differences are not apparent from the published indicative map.

This illustrates the importance of transparent, property-specific assessment based on actual ground levels, predicted flood depth and extent, safe access and proposed building design.

Construction on flood-affected land

My understanding is that residential construction can presently be considered on flood-affected land where habitable floor levels are built above the prescribed flood level and the relevant flood-management requirements are satisfied.

If appropriately elevated residential construction can be safely approved on an existing title, it appears unnecessarily rigid to prohibit subdivision automatically without considering whether the same safety outcome can be achieved through surveyed levels, engineered design, elevated habitable floors and appropriate conditions.

Subdivision creates an additional title and may accommodate another household, but this does not mean that all flood-overlay properties present the same level of risk. The actual risk depends on the characteristics of the individual site and the proposed development.

Relevant Planning Commission material

The original Discussion Paper recognised flood-affected land as a constraint and stated that such land should not be further burdened. However, it did not set out or invite specific feedback on the blanket prohibition now proposed.

The subsequent Consultation Summary Report recorded stakeholder views that environmental risks, including flooding and runoff, should be managed through design and green infrastructure. It also recorded support for evidence-based, place-based planning and clear assessment criteria that allow flexible design solutions.

The Planning Commission's March 2026 report recommended that infill proposals be merit assessable through a development application so that infrastructure, amenity and other site-specific matters could be assessed. It also supported discretion where land can functionally support residential development without causing adverse impacts.

The Commission identified Exceptional Development Permits as providing case-by-case flexibility and acknowledged that they could facilitate infill in the interim. However, it also recognised that reliance on EDPs creates uncertainty.

The proposed blanket prohibition for flood-overlay properties does not provide the same site-specific, merit-assessed pathway that is central to the broader infill proposal.

Requested amendment

I request that the proposed amendment be revised so that flood-affected Zone LR properties are not automatically prohibited from subdivision or dwelling-group development merely because all or part of the title intersects the flooding overlay.

Instead, subdivision and development should remain merit assessable where the applicant provides appropriate technical evidence demonstrating that:

- the development responds to the actual flood characteristics of the site;
- all habitable floors will be above the prescribed flood level;
- buildings and essential services will be appropriately flood-resilient;
- safe access and evacuation can be provided;
- the development will not impede flood flows;
- the development will not increase flood levels or risk on adjoining land;
- drainage and stormwater impacts can be appropriately managed; and
- the land is otherwise suitable and adequately serviced for the proposed residential use.

If the Government does not consider a general merit-assessed pathway appropriate, the amendment should at least:

1. distinguish between different levels and depths of flood risk rather than treating all land within the overlay identically;
2. allow consideration where site-specific surveying, flood assessment and engineered design demonstrate that the required safety standard can be achieved;
3. preserve a clearly stated and practical case-by-case pathway for suitable flood-affected properties; and
4. ensure that adoption of the amendment does not itself prejudice future Exceptional Development Permit applications merely because a property is excluded from the new general pathway.

Conclusion

I support measures that increase housing availability and make efficient use of large, serviced residential properties in Alice Springs. However, flood risk should be assessed and managed according to the actual characteristics of each property and proposed development.

A blanket prohibition removes the ability to distinguish between sites with materially different flood depths, elevations, access arrangements and engineering solutions. It may also remove opportunities from large, otherwise suitable properties at the same time that comparable Zone LR properties are being given substantially greater development flexibility.

I therefore request that a merit-assessed pathway be retained for flood-overlay properties that can demonstrate an acceptable and safe development outcome.

I also request that, before the amendment is finalised, consideration be given to how the proposed blanket prohibition would affect large, potentially suitable flood-overlay properties such as [REDACTED] Street.

Barbara Saunders

[REDACTED]



To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Name: Christine Cox

Address [REDACTED]

Email: [REDACTED]

RE: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to lodge a formal submission regarding proposed Planning Scheme Amendment PA2026/0205.

While I recognise the need for diverse housing options in the Northern Territory, I have strong concerns regarding the blanket implementation of 450 m² minimum lot sizes and battle-axe subdivisions in Zone LR without adequate evidentiary support.

My key concerns are as follows:

1. Infrastructure Constraints:

The proposal relies heavily on existing reticulated infrastructure (water, sewerage, power, stormwater, and road networks) without presenting any suburb-by-suburb capacity modelling. Suburb infrastructure in established Territory areas is ageing. Blanket density increases without prior infrastructure upgrades risk network overload, traffic congestion, and delayed developer-funded fixes.

No information is provided about the capacity of roads, drainage, sewerage, water, electricity, schools or community facilities to accommodate increased residential density within the highlighted areas.

2. Loss of Neighbourhood Character and Tree Canopy:

Replacing large 800 m² garden blocks with dual 450 m² lots reduces open ground, deep soil zones, and mature tree canopy. The NT suffers severe urban heat island effects. High-density infill without strict canopy preservation rules will increase local ambient heat, compromise privacy, and permanently alter low-density suburban character.

I'm concerned about the loss of vegetation and increase in concrete surfaces which impacts on urban heat, shade loss, privacy, or back-block overdevelopment.

3. Strategic vs. Blanket Infill:

The map identifies redevelopment opportunities across the municipality without distinguishing between areas that may be appropriate for increased density and those that may require protection because of infrastructure limitations or neighbourhood characteristics. No suburb specific planning assessment accompanies the mapping. The map illustrates the geographical extent of potential redevelopment but does not assess the cumulative effects on traffic, parking, neighbourhood character, tree canopy, urban heat, public open space or community infrastructure if redevelopment occurred across substantial portions of the highlighted suburbs.

The map gives no indication of redevelopment intensity.

Although numerous parcels are identified, the map does not estimate:

- how many lots may ultimately be subdivided;

- how many additional dwellings could result;
- expected population increases;
- additional vehicle movements;
- increased demand for public infrastructure.

Without this information, the scale of the proposed planning changes cannot be properly assessed.

Recommendation:

I request that the Minister defer approval of PA2026/0205 until:

- Detailed infrastructure capacity assessments are conducted for each Zone LR locality.
- Place-based infill plans are developed in consultation with local communities.
- Strict tree canopy retention standards and urban heat mitigation rules are integrated into the amendment text.

Darwin deserves better planning.

Thank you for considering this submission.

Christine Cox

[REDACTED]

[REDACTED]

[REDACTED]

To whom it may concern

Re: PA2026/0205

My submission is that the minister should request further information and re-exhibit the proposal once the additional information is provided. This is based on the following:

Amendment to Clause 4.2 Zone LR – Low Density Residential

Zone Outcomes

1. ~~Predominantly~~ dwelling-single and associated dwelling-independent ~~predominantly~~ ~~generally~~ two storeys or less, on ~~individual lots on a range of lot sizes that respond~~ ~~to provide a diverse mix of housing and accommodate evolving~~ ~~changing~~ community needs.
2. ~~Dwelling-group and dwelling-multiple generally two storeys or less to contribute to housing diversity in a manner consistent with the amenity of the zone.~~

There is no explanation in the explanatory document why the word “predominantly” has been replaced with “generally” and what the implications of this change will be from a town planning perspective. The proposed wording is ambiguous and should be updated to include specific zone outcomes, with explanations and implications provided in the explanatory document.

Amendment to Clause 6.2.1 - Lot Size and Configuration for Subdivision in Zones LR, LMR, MR and HR

Requirements

- ~~11. Potential land use conflicts are minimised by taking account of the visual and acoustic privacy of residents.~~

There is no explanation in the explanatory document why this requirement is proposed to be removed. Given that the proposed planning scheme amendment has the potential to impact visual and acoustic privacy (e.g. a new dwelling on a subdivided block or dwelling-group development having direct line of sight into private living spaces or overlook outdoor living spaces of the neighbouring property, and vice versa; noise from the increase in the number of air-conditioning units and pool pumps in an area), such a sub-clause is important and should be retained. If it is considered that there is a general or specific development requirement that appropriately addresses such issues, then that justification should be provided and explained in the explanatory document.

Regards

Peter Morante

21 August 2026

Dr Andrew Harford

Email: [REDACTED]

To Development Assessment Services and the Minister for Infrastructure, Planning and Logistics,

**RE: Submission against to Planning Scheme Amendment PA2026/0205
Proposed reduction of residential lot sizes in Zone LR**

Please accept this letter as my formal objection to Planning Scheme Amendment PA2026/0205. I request that the amendment not proceed. Alternatively, it should be deferred until suburb-level infrastructure, traffic, environmental and cumulative-impact assessments have been completed and published, with enforceable safeguards incorporated into any revised proposal.

Although I recognise the need for additional housing in Darwin, established low-density suburbs are not the right setting for achieving it by broadly reducing minimum lot sizes. Such a change could permanently diminish neighbourhood character and amenity, remove important environmental features and place further demands on infrastructure that was designed for a lower level of development.

1. Community expectations and the purpose of Zone LR

The Planning Act 1999 seeks, among other things, to ensure that strategic planning responds to community needs and wishes and that the preparation of planning schemes includes meaningful public consultation and input.

From the perspective of a Wulagi resident and member of the wider Darwin community, the proposed amendment does not reflect the residential setting many people have deliberately chosen. My family purchased our Wulagi home in 2025 specifically seeking an established, peaceful and leafy court, and paid a premium to secure a home in a neighbourhood with those attributes. The amendment could gradually erode the features that informed our decision. A four-bedroom, two-bathroom house in Muirhead or Lyons was an available alternative, but we chose Wulagi because we wanted a different residential experience with large blocks.

This objection is not directed at smaller lots or thoughtfully designed higher-density housing in principle. Suburbs such as Muirhead and Lyons show that compact development can work when the subdivision pattern, roads, landscaping, dwelling placement, fencing and related design requirements are coordinated from the outset. Applying comparable development potential retrospectively to suburbs planned for low-density living is a fundamentally different proposition.

2. Greenfield planning is not equivalent to infill subdivision

The present planning framework appropriately distinguishes between greenfield locations intended for compact growth and established land in Zone LR. That distinction should be retained.

In a new development, density can be matched with roads, drainage, services, public open space, landscaping and building orientation before construction begins. By contrast, older suburbs already have fixed street layouts, mature gardens, established houses and long-settled development patterns. Those constraints cannot simply be planned away after density is increased.

Without equivalent safeguards, expanded subdivision rights are more likely to produce piecemeal overdevelopment than coordinated urban consolidation. Smaller lots should instead be concentrated where the urban form and infrastructure can be designed or upgraded for the intended population, as discussed further in points 7 and 8.

3. The scale of change around Teal Court would be substantial

The consequences can be illustrated directly in the immediate vicinity of my home.

A short length of street and the adjoining small court contain about 20 residential lots. My the amendment would result in 13 lots being eligible for subdivision, while about seven would not. If each of those 13 lots were divided and accommodated one extra dwelling, the local total could rise from around 20 homes to around 33, which is a 65% increase in the density of homes within a very limited area.

Likely cumulative consequences include:

- more vehicle movements, traffic and congestion on narrow local roads;
- greater pressure on both on-site parking and kerbside space;
- additional noise and demand on existing utilities;
- removal of mature trees and other established vegetation;
- loss of privacy and residential amenity; and
- a marked change to the appearance and character of the street and court.

These effects should be evaluated collectively before the underlying planning controls are altered. Points 4–7 address the principal traffic, parking, canopy, tropical-design and infrastructure consequences in more detail.

4. Local roads and parking capacity

The associated growth in vehicle numbers warrants particular attention. Thirteen additional households owning two or three vehicles each could introduce a large number of cars into this compact area, with an upper estimate of about 39 additional vehicles. Although car ownership may vary, this scenario shows why the amendment must be tested for its combined traffic and parking effects at neighbourhood scale. It is unreasonable to assume that the small courts and local street of the northern suburbs can absorb this degree of change merely because separate landowners may become entitled to subdivide.

5. Canopy loss, shade and urban heat

Wulagi and other established northern suburbs are valued in large part for their mature gardens and extensive tree cover. Additional houses, access-ways, garages and parking areas would create strong pressure to clear trees, palms and other vegetation from existing lots. The consequence of this is especially impactful in Darwin's hot tropical conditions. Established canopy provides shade, moderates local heat and contributes substantially to neighbourhood amenity. Vegetation removed across many separate projects could collectively strip established areas of both their leafy identity and environmental performance. Tree loss must therefore be assessed across the suburb, supported by strong

retention and replacement measures, and considered alongside the tropical-design requirements in point 6 and the cumulative assessment requested in point 9.

6. Density must respond to Darwin's tropical climate

Residential planning in Darwin must account for heat, seasonal conditions and passive cooling. Building spacing, setbacks, orientation and vegetation retention help preserve airflow, shade and usable outdoor areas. These features can be coordinated from the outset in newer suburbs such as Muirhead and Lyons; permitting more dwellings on established lots does not demonstrate that equivalent outcomes will follow. Consistent with the canopy concerns in point 5, the Government should explain how the amendment would maintain airflow, shade, landscaping, suitable building separation and other tropical-design qualities.

7. Existing services may not have spare capacity

There is also a significant infrastructure concern in my local area. Wulagi currently experiences poor water service: a recent daytime test at my property took approximately 58 seconds to fill a 10-litre bucket, with poorer service often evident during peak use after 5:00 pm. While this observation is not a formal pressure test, it illustrates why capacity should be demonstrated before density increases. I request that the Government obtain and publish advice from the relevant service authorities confirming capacity for the additional dwellings, including water supply, sewerage, stormwater, electricity and roads. These matters should be assessed together with the neighbourhood-scale impacts identified in points 3 and 4 and the cumulative assessment in point 9.

8. Development should occur where infrastructure can support it

Darwin retains opportunities for residential development in greenfield areas where roads, drainage, water supply, sewerage, landscaping, open space and pedestrian connections can be planned for the intended density. By contrast, progressive subdivision of established blocks can require infrastructure and streets to accommodate development levels for which they were not designed. For the reasons set out in points 2 and 7, a greater proportion of new housing growth should be directed to locations where coordinated planning and any necessary upgrades can occur before residents move in.

9. Request for a proper assessment of cumulative impacts

As the [REDACTED] example in point 3 shows, impacts that appear minor subdivision by subdivision may become significant across an established suburb. The Planning Commission should therefore assess the amendment cumulatively rather than relying only on site-specific development controls. That assessment should integrate the matters detailed in points 4–7, including:

- additional dwellings, traffic generation, parking demand and road capacity;
- water supply and pressure, sewerage, stormwater and electricity capacity;
- loss of mature trees and canopy, urban heat and airflow;
- noise, privacy and residential amenity; and
- the long-term character of established northern suburbs.

Conclusion

I strongly object to Planning Scheme Amendment PA2026/0205. I support sensible and sustainable housing growth in Darwin, but increasing subdivision potential across established low-density suburbs is not the appropriate way to achieve it. As outlined above, these suburbs provide a residential environment characterised by mature trees, large gardens, quiet streets and relatively low density—qualities many residents deliberately chose and paid a premium to obtain. The amendment risks progressively removing those qualities without demonstrating that existing infrastructure can support the resulting density or that the cumulative environmental and amenity impacts identified in points 3–9 can be effectively managed.

I respectfully request that the proposed amendment **not proceed**.

At a minimum, before any amendment is approved, the Government should publicly release the integrated cumulative assessment requested in point 9, supported by detailed advice on infrastructure capacity, traffic and parking, canopy and vegetation loss, urban heat and essential services.

I ask the Planning Commission to give significant weight to the concerns of existing residents who will live with the long-term consequences of these planning changes.

Kind regards, .

Signed:



Andrew Harford



Wulagi NT 0812

To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Name: Matthew McKenna & Jessica McKenna and on behalf of our 2 children

Address: [REDACTED] Parap

Email: [REDACTED]

Re: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing on behalf of my growing family to lodge a formal, strong objection to the proposed Planning Scheme Amendment PA2026/0205. As residents of [REDACTED] Street in Parap, living in a home constructed in 1951—one of the earliest in the suburb—we face an extraordinary level of direct exposure to this proposal. Our property is bordered by four adjacent blocks, three of which meet the criteria for direct impact under the proposed zoning change. This leaves our family exceptionally vulnerable to the immediate, negative consequences of surrounding high-density infill.

We strongly object to the proposal based on the following critical points:

- **Direct Family Vulnerability & Severe Localised Impact:** Sharing boundaries with three potentially developable lots puts our home at immediate risk of severe privacy loss, reduced natural airflow, heightened noise, and looming multi-dwelling constructions right on our fence line. Our lot would be subject to the same rezoning, yet we have intentionally structured our own redevelopment to enhance the natural airflow and heat mitigation already and intentionally established.
- **Pattern of Poor Planning & Knee-Jerk Decisions:** The ill-considered, recent realignment of our local bus routes has already clearly demonstrated the government's lack of genuine community consideration. That decision highlights a concerning pattern of knee-jerk responses to perceived issues rather than well-planned, justified proposals—a trend this blanket planning amendment directly continues.
- **Undermining Substantial Private Capital Investment:** We have invested significant capital into improving and bringing our historic 1951 property up to modern standards. We did so with great care to preserve and honour the traditional "troppo" architectural style of Parap. A blanket zoning change disrespects and devalues this personal financial sacrifice, threatening to undermine local property values.
- **Precedent of Incompatible "Cookie-Cutter" Development:** The visual degradation caused by infill is already evident along Ross Smith Avenue, where recent subdivisions have introduced generic, modern builds that completely disregard local tropical character. Expanding this scale of "cookie-cutter" development will permanently destroy the aesthetic, cultural, and historic value of Parap—including its surviving post-disaster heritage architecture.
- **Urban Heat Index & Environmental Degradation:** Replacing established trees, shaded gardens, and traditional louvred layouts with dense multi-dwelling footprints amplifies the urban heat island effect. This loss of green canopy directly harms liveability, increases energy reliance, and strips away vital local wildlife habitats.

- **Dangerous Traffic Behaviour & Road Overuse:** [REDACTED] Street already suffers from dangerous, two-way speeding and heavy traffic volume, which worsens significantly during daily transit windows and tourism peaks. Using residential arterial roads as shortcuts is already unsafe; adding higher-density housing will exacerbate traffic hazards for our and other young families.
- **Critical Infrastructure & Schooling Strain:** Parap's aging physical infrastructure cannot support rapid densification. Furthermore, as an educator, I know firsthand that Parap Primary School holds a half-century reputation as a premier educational institution in the Territory. Our schools and teachers are already under immense pressure, and unmanaged population growth will compromise classroom standards and educational quality.
- **Short-Term Rate Maximisation vs. Long-Term Financial & Infrastructure Realities:** The proposal reflects a short-sighted intent to artificially expand the municipal tax base without considering the immense financial challenges and practical complications of constructing high-density housing in established suburbs. Crucially, established areas like Parap have not been prioritised—or even provided a timeline—for essential underground power infrastructure. Our power grid remains highly vulnerable to frequent, substantial outages not only during major natural hazards, but even during routine wind and rain. Because dense infill makes the safe removal of mature trees and surrounding infrastructure either physically impossible or financially prohibitive for property owners, forcing rapid infill onto an already fragile, overhead-serviced grid creates severe long-term operational and safety risks that far outweigh any short-term revenue gains.

Conclusion

Rather than imposing an ill-conceived "quick-fix" amendment across all LR zones, the Government must undertake considered, place-based planning that respects neighbourhood character, local heritage, and infrastructure capacity. The baseline concerns of local residents—many of whom have lived in these suburbs longer than those currently on council have been alive—are consistently ignored, while the short-term priorities of those in power are pushed through as some sort of badge of honour or personal legacy. We urgently request that the Minister defer approval of Amendment PA2026/0205 until proper consultation and genuine impact assessments are completed. Thank you for considering our family's submission.

Yours sincerely,

Matthew McKenna



Jessica McKenna



21st August 2026

To whom it may concern,

RE: PA2026/0205 - Planning Scheme Amendment Change to minimum land size for subdivision.

As a long-term resident of Darwin, I am extremely concerned regarding the proposed changes to the minimum land size requirements for subdivision. The proposed changes have the capacity to ruin many Darwin suburbs and our city in general, while also representing a missed financial opportunity.

The proposal to allow houses with 900 square meters or more to be able to be subdivided does not consider the negative impacts on our infrastructure. Trower Rd, Bagot Rd, and other prominent roads from the northern suburb to the city are already quite congested in the morning. The proposed changes allow the possibility of exponential population growth in the Northern Suburbs and soon our roads could experience similar congestion to the very southern cities Darwin residents dislike. For a government which campaigns on representing Territory values, why would you want to make this change? The infrastructure concerns extend beyond roads, with other important facilities, such as the Woolworths, already at capacity.

Housing affordability is a major appeal for Darwin. In major southern cities where subdivision laws are similar to what you are proposing, it is now next to impossible for a young family to purchase a house in southern cities where there is enough space for a garden, lawn for sports, and a pool. Developers are able to edge any family out and subdivide the properties into small parcels of land where identical houses are erected. This is the possibility which faces Darwin under your proposal.

As an individual who lives at [REDACTED] Rapid Creek, which your submission portal did not recognise, on a property of over 900 sqm one of my favourite parts of the property is my trees. Myself and my neighbours have countless large trees which act as natural cooling for the neighbourhood. I ask you to consider when the last time you saw new developments on less than 450sqm with large trees? With global warming making Darwin hotter, losing natural shade and the leafy northern suburbs appearance will have detrimental impacts on our quality of life and population as people search for cooler cities.

Darwin has countless empty spaces of land, especially on the way to Palmerston. Auctioning off portions of this land will not only allow for more housing but can contribute to the income stream of the government. There is an interest to live in this area, with North Crest being sufficient evidence for this.

Your sincerely,



Samuel Swan (Please accept this as the signature for the letter).

To whom it may concern,

RE: PA2026/0205 - Planning Scheme Amendment

My name is Annie Lillis-Jones and I have lived in Darwin for over 2 decades. I do not agree with the proposed amendment to subdivision. I believe that reducing minimum block size could have a significant impact on the character and liveability of many Darwin suburbs. My concern is blocks that may be subdivided will have less trees and feel more crowded. Our infrastructure isn't made for more houses and cars, Bagot and Trower roads are busy every morning, why add to it?

These suburbs are part of what makes Darwin different to other capital cities.

While I understand a need for more housing to accommodate population growth, I believe this should not change Darwin's character to do so. There is so much land between Darwin CBD and Palmerston that would be better to sell off rather than crowd the northern suburbs.

Thank you,
Annie Lillis-Jones

Re Proposed Planning Scheme Amendment PA2026/0205

To Whom it may concern:

I wish to advise my objection to the above mentioned Amendment. This affects our lifestyle right across the Northern Territory.

Although my property is not affected by this suggestion of sub-division, there are some properties around my neighbourhood that are. But I especially object to what could be the destruction of our suburbs such as Nightcliff, Rapid Creek, Millner, Parap, Stuart Park and Brinkin. These are just the Darwin suburbs most affected. Every major town in the Territory will have their character lost if this is allowed to go through.

The NT Government has hidden this matter from the general public – most people are unaware of this Amendment that was listed on 14th August for only 14 days, with no community consultation beforehand.

The areas that will be most affected by this attempt to sub-divide so many blocks, will lose:-

- their character of tropical homes and gardens,
- reduced property values
- overcrowding of neighbourhoods
- increased all-ready congested street parking
- reduced privacy
- overload on old and struggling services such as sewerage
- also stretching services such as schools and other community infrastructure
- loss of tropical living with louvres, reduced to small living spaces requiring increased energy costs due to overcrowding of blocks
- huge loss of green tree canopies shading our neighbourhoods
- thus increasing heat from open concrete and bitumen
- loss of native habitat with the loss of trees and established gardens

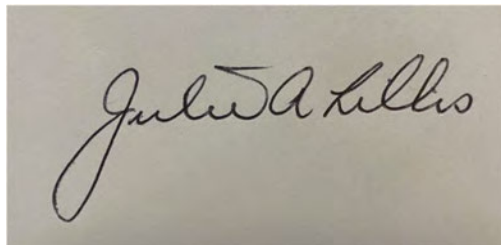
Please do not accept this amendment proposal put up by an ignorant government. Let developers find space outside of Darwin beyond the Berrimah line to make their money with land grabbing.

I hope you can see I strongly oppose this proposed Planning Scheme Amendment.

Kind regards

Julie Lillis

Wanguri NT 0810

A photograph of a handwritten signature in black ink on a light-colored background. The signature is written in a cursive, flowing style and appears to read 'Julie Lillis'.

**Attention of Development Assessment Services / Minister for Infrastructure,
Planning and Logistics**

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Names: Inge Gardiner (behalf of Gardiner family)

Address: [REDACTED] Fannie Bay

Personal Email: [REDACTED]

Re: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to lodge my families' formal objection to the proposed Planning Scheme Amendment that would allow LR residential lots 800m² or larger across the NT to be subdivided to 450m² (or 405m² by consent) and for battle-axe lots to be created, for infill housing.

We strongly object to this proposal

Our family has very serious and valid concerns about this Planning Proposal Amendment, particularly as the infill housing that would be allowed on Zone LR land would include not just two dwellings on one existing subdivided block, but a "dwelling-group" (a collection of townhouses) or a "dwelling-multiple" (an apartment building).

The potential increase in densification would be devastating to the amenity of our home and suburb.

The consultation held in November/December of 2025 was inadequate and the people who raised concerns were not respected and followed up. I believe that the report that was tabled to the Minister did not represent a true account of the concerns of the people of NT and as a result there is an urgent need for the people of the NT to be heard and their concerns validated and addressed.

Having been fortunate enough to have lived and worked in three of the major towns/cities in the NT (Darwin, Katherine and Alice Springs) I have seen first-hand the devastation that poor planning of infill can have not only on the aesthetics of a location but also on the people that live in the regions.

Our family purchased our first house in Alice Springs on a beautiful 1000m² block in the older suburb of Braitling ([REDACTED]) and worked endlessly to reestablish the gardens to

incorporate a range of local native trees and shrubs to provide a sustainable native habitat to be sustainable for the future while also providing a native tree corridor on our street for wildlife.

We later sold our house and moved to Darwin for work. Again, we actively chose to purchase an old house in an older suburb with large block, [REDACTED] in Fannie Bay. As a couple with two young kids at the time, it was a huge financial sacrifice we made but we valued the importance of providing a safe home environment with lots of space for children to grow and explore in the natural environment with trees, space and sustainable living.

The 50-year-old elevated house in Fannie Bay we live in survived Cyclone Tracy. It still holds so much of the pre-cyclone charm of the tropical houses of our area. It is a piece of history that should be treasured. Like our large yard in Alice Springs have spent considerable time and money to establish large shade trees to provide an environment for our family to thrive in. This together with a house that is suitable for the NT tropical climate is what makes living in this Top End unique.

Our house is not renovated, as we don't have the money for that, but despite this we greatly appreciate the opportunity to live in a sustainable house suited for the climate. We spend what money we have working on improving the garden with the hopes that one day we will have the money to enhance the infrastructure of the house while keeping its unique elevated pre-cyclone charm.

We live directly across from a cleared 1280m² block [REDACTED] which according to the proposed planning scheme would mean that this block alone could hold three houses as each could have (450m²). The Zone LR Planning Amendment PA2026/0205 proposal would mean that three houses could be built in that lot ([REDACTED]) and each has two cars (one for each potential adult) there could be 6 or more cars at any one point leaving that location adding to significantly traffic congestion on the street. The area outside that block is already the only side of the road that people are able to park so with three potential driveways in that space it would leave no space for cars already using the curb side to park due to the units and hotel already on the same side of the street.

Our street is narrower than many of the streets in the Fannie Bay area and as a result even have a 'yellow' do not park line one side of our street, which is maintained by the City of Darwin Council. Just yesterday this yellow line was repainted (20th of August 2026) by the council due to significant concerns of residents about people ignoring the 'no parking' on half of the street. Just recently there have been some serious near misses between cars, people, bicycles due to the congestion, poor accessibility and poor visibility due to the additional cars. The council as well as our residents clearly have concerns about the congestion on our street.

In addition, we have serious concerns about significant additional stress on the power, water, and sewage on our street should this proposal go ahead. We already have numerous incidents of water drainage issues at the lower end of this street near the Capricornia motel and the flats directly beside them have repeatedly reported issues with sewerage backup in their units as a result.

We believe many residents in both our suburb and other areas affected by this proposal are completely unaware of these proposed changes.

Personally, we are appalled that there was no letter drop by our local CLP member of Fannie Bay to show their transparency of how her suburb will be impacted and therefore want to emphasise the significant bias this will cause with our local community being unaware of what is being proposed and how it will impact them.

Formally I would like to emphasise our families concerns regarding the proposed Zone planning LR amendment (as tabled below).

1	Change and destroy the unique character of the suburb we reside, Fannie Bay Fannie Bay is one of the last remaining areas of 'old' Darwin, with a history stretching back 70 years. It holds a significant place in the cultural heritage of Darwin, and the unique character of this iconic suburb should be preserved not irreversibly changed for the worse and degraded by subdivision and medium density infill housing.
2	An increase in the 'Urban Heat Island Effect' resulting in Multiple Serious Issues Darwin is already experiencing increasing higher ambient temperatures, and this will only increase with climate change. With increasing heat combined with the high humidity it is a priority that efforts are made by our government to mitigate the 'urban heat island effect'. Subdividing large blocks or building group or multiple dwellings will do the complete opposite as it would significantly decrease tree cover, increase areas of paving and hot roofs and increase the 'urban heat island effect'. The concerning results would be: • Increased need for expensive, carbon producing energy consumption for air-conditioning • Increased community health issues, including heat related mortality and morbidity • Decreased liveability and sustainability of Darwin as a place to live and thrive The City of Darwin's 'Place and Liveability Plan 2050' recognises the need to "support heat mitigation through cooler, greener neighbourhoods". Why is this not being considered a priority?
3	Existing Infrastructure being further overloaded/compromised Our suburb was built in the late 1950s, we already have to deal with this aged infrastructure for water, sewerage, electricity and storm water drainage. We have already

	highlighted that we experience significant issues with these. This infrastructure is dated and has limited capacity to accommodate any increases in demand that would result from densification of existing blocks. Any required upgrades to infrastructure would be very expensive and disruptive to residents.
4	Degrade our quality of life and threaten financial investment of residents Increasing the density of people living together can negatively affect quality of life through increased noise, decreased air flow, decreased privacy and decreased open space for valuable outdoor living opportunities with children, friends and pets. Most houses in Fannie Bay even when renovated are built for the tropics with open windows or louvres to allow for cooling breezes. Some residents have actively made significant financial investments to protect this way of life even when renovating/upgrading these houses. The proposed amendment would cause degradation of the suburb and could have serious, unfair negative consequences to the value of our investments and devalue the sacrifices we have made to live in Fannie Bay.
5	Destroy Wildlife Habitats and Degrade Biodiversity The large gardens and shade trees of Fannie Bay provide a wealth of habitats for native wildlife, including a wide variety of birds and reptiles as well as mammals such as possums. Densification would destroy these habitats and severely reduce the precious biodiversity we are fortunate to have living within our city.

To address these concerns, we ask that the following are completed.

1	Deferral of Amendment PA2026/0205 Until there has been extensive engagement with residents, stakeholders, researchers and experts in urban planning and heat mitigation, so that a comprehensive, well-thought-out plan for future place-based urban development can be devised that addresses housing needs while catering for heat mitigation and the desire of residents for a vibrant tropical city in which to live and thrive.
2	Upfront infrastructure planning With full assessment of road capacities sewer, water grid and power BEFORE any of these zoning rules change. It is not appropriate to leave these tests to be done afterwards
3	Transparent local modelling

	We believe that the government should be required to prove the need with data and modelling to prove their claims that smaller lots sizes will improve the housing supply and affordability.
4	Evidence of how the government will protect the tree canopy So that protect of important shade trees are protected in all regions that will be affected by these lot changes
5	Enforced hazard exclusions That there is a total ban on subdivisions and swelling groups within land subject to floods (LSF) and Land subject to Storm Surge (LSSS) overlays.

Just this week I learnt about the Cairns, “long-range, community-informed initiative” to develop their ‘Towards 2050 : Shaping Cairns Growth Strategy’. They are leading the way in allowing the people who live in their city to speak, to have a voice and to ensure that their city is liveable in a world experiencing significant impacts of climate change.

Why has our government should read this strategy and meet with their government? Learn from their planning for the future. Cairn’s roadmap for the next 25 years of urban development needs to be read by our government and planning authority and used as a model for effective public consultation.

The 4 phases they followed clearly demonstrates the length they have gone to, to ensure their community is heard appropriately and all stakeholders (young and old, and most importantly including the traditional custodians of the land in the consultation).

Phase 1: focused on community engagement

Phase 2: tested feedback from community at a youth summit and a community summit

Phase 3: invited community and stakeholders to review a directions paper, including a second youth summit and community summit.

Phase 4: focused on sharing a draft Growing Strategy with community and stakeholders as well as Traditional Owners.

Our family believes that we have clearly raised legitimate concerns that should be taken seriously straight away before, any amendment is made to the Planning Scheme. There are solutions to the housing issue without resorting to the destruction of existing suburbs.

Let the community and the government work together to find solutions to the growing need for varied housing options, such as housing that is genuinely 'affordable', more medium density housing in already designated corridors near existing services, and high-density housing in appropriate locations. Existing greenfield areas and under-utilised government land could also be used for 'infill' housing development.

We believe that the government needs to address Darwin's housing issues in a local 'place-based' planning where a 'whole of city' approach examines and assesses areas suitable for 'infill' and densification and determines what type of housing is appropriate in each, rather than simply applying a reduction to block size and excessive infill everywhere, regardless of varying circumstances and needs in different suburbs

Not listening to the community and their concerns, would imply that the government is deliberately sidelining the community in favour of developers.

We would therefore urgently request that the Minister defer approval of Amendment PA2026/0205 until there has been extensive engagement with residents, stakeholders, researchers and experts in urban planning and heat mitigation. We urge you to consider that working with your community and allowing for a long-term housing solution and not a 'quick fix' amendment is a more sustainable way to guide Darwin into the future. Listen to your community.

We look forward to the opportunity to speak to our submission and our objection to the proposal.

Regards,

Inge Gardiner on behalf of the Gardiner family.

A handwritten signature in black ink, appearing to read 'Inge Gardiner', written in a cursive style.

21st August 2026

SUBMISSION TO THE NORTHERN TERRITORY PLANNING COMMISSION

Proposed Planning Scheme Amendment: Infill Development and Subdivision in Zone LR

Submitted by: PPlan: the Planning Action Network Inc.

PPlan: the Planning Action Network Inc. submits this submission regarding the Proposed Planning Scheme Amendment for Infill Development and Subdivision in Zone LR. A blanket Territory-wide amendment ignores vital precinct dynamics, risks severe infrastructure overloading, and threatens established tropical neighbourhood amenity.

Section 1: Precinct & Infrastructure Breakdown

Applying uniform zoning relaxations across distinct municipalities and precincts fails to account for critical variations in infrastructure capacity, site geometries, and local environmental constraints.

Precinct / Locality	Constraint & Mapping Reality	Strategic Planning Impact
Darwin Inner & Northern Suburbs (Nightcliff, Sanderson)	High concentration of Zone LR lots $\geq 900 \text{ m}^2$. Water and power networks are aging, nearing end-of-life, and lacking headworks capacity. Sewerage mains frequently run through private rear easements.	Uncoordinated infill risks network bottlenecks or shifts major upgrade costs onto councils and utilities without proactive headworks planning.
Palmerston (Driver, Moulden, Woodroffe)	Specific clusters of eligible $\geq 900 \text{ m}^2$ lots.	Applying blanket density rules without precinct plans risks eroding established streetscapes while greenfield land supply remains accessible nearby.
Regional Towns (Tennant Creek, Katherine, Alice Springs)	Fewer than 1,000 eligible lots spread across regional centres, each facing distinct soil, drainage, and servicing profiles.	Uniform frontage (12 m) and lot size reductions (450 m^2) fail to reflect regional housing delivery

Precinct / Locality	Constraint & Mapping Reality	Strategic Planning Impact
		economics or lifestyle expectations.
Litchfield Municipality	Rural/semi-rural lifestyle context without reticulated deep sewerage in many LR pockets.	Litchfield Council explicitly requested exclusion, proving that local precinct governance must dictate infill applicability.

Core Arguments

- **Infrastructure Hard Limits:** Power and Water Corporation (PWC) feedback explicitly warns that older suburban networks cannot absorb uncoordinated density without costly, unplanned upgrades. An ad-hoc "first-come, first-served" merit assessment pathway creates inequitable upgrade burdens and service degradation.
- **Streetscape & Canopy Loss:** Reducing frontages to 12 m while maintaining a 6.5 m continuous kerb requirement restricts off-street parking, increases hardstand coverage, and severely degrades urban tree canopy and deep-soil permeable areas.
- **Discretionary Erosion:** The proposed 10% variation allowance (reducing minimum lot size to 405 m² and density to 1 per 405 m²) systematically undercuts the stated 450 m² standard across established suburbs.
- **Spatial Precedent in Hazard Zones:** The explicit exclusion of infill on Clause 3.6 (Flooding) and Clause 3.7 (Storm Surge) overlay land proves that spatial precinct constraints are valid criteria for excluding or restricting infill.

Section 2: Detailed Clause-by-Clause Counter-Proposals

The table below outlines statutory counter-proposals to the draft Northern Territory Planning Scheme (NTPS) amendment, establishing strict guardrails against uncoordinated infill.

NTPS Clause	Draft Scheme Amendment Proposal	PLan Counter-Proposal	Planning & Environmental Justification
Clause 4.2 <i>(Zone LR Purpose & Assessment)</i>	Makes Dwelling-group and Dwelling-multiple Merit Assessable across all Zone LR.	Reclassify Dwelling-multiple as Prohibited in Zone LR unless specified under an approved Precinct Infill Area Plan.	Prevents ad-hoc densification across unprepared suburbs lacking headworks capacity. Ensures higher density aligns with strategic place-based planning.
Clause 5.4.1 <i>(Residential Density)</i>	Sets density at 1 dwelling per 450 m ² , with consent authority discretion to vary density by up to 10% (1 per 405 m ²).	Remove 10% variation discretion. Require a mandatory Infrastructure Capacity Certificate from Power and Water Corporation (PWC) prior to lodging any density increase above 1 per 800 m ² .	PWC confirmed older networks lack capacity for unanticipated load increases. Discretionary creep to 405 m ² compounds network failure risks without developer-funded upgrades.
Clause 6.2.1 <i>(Table A: Lot Sizes)</i>	Reduces minimum lot size from 800 m ² to 450 m ² across all established Zone LR areas, with 10% variation	Retain 800 m ² minimum as the default baseline in established Zone LR. Allow 450 m ² <i>only</i> within designated Precinct Infill Overlays	Prevents uniform lot splitting in established suburbs. Preserves local character, neighbourhood open space, and suburban deep-soil permeability.

NTPS Clause	Draft Scheme Amendment Proposal	PLan Counter-Proposal	Planning & Environmental Justification
	discretion down to 405 m ² .	supported by utility capacity.	
Clause 6.2.1 <i>(Table B: Building Envelopes)</i>	Removes the 17 m × 17 m building envelope requirement for lots 600 m ² and greater.	Retain mandatory minimum building envelopes and introduce a strict Maximum Site Coverage cap of 45–50% for all infill lots.	Enforces private open space, protects tropical breeze paths, prevents overdevelopment, and mitigates urban heat island impacts.
Clause 6.2.1(8) & Schedule 2.2 <i>(Battle-axe Lots)</i>	Permits battle-axe lots in Zone LR where site geometry requires or to retain an existing dwelling.	Permitted only where: 1. Access handle width is a minimum of 5 m. 2. Driveway hardstand does not exceed 30% of total site area. 3. Access handle is excluded from	Prevents narrow access choke points, guarantees emergency and waste vehicle access, and limits total impervious surface runoff.

NTPS Clause	Draft Scheme Amendment Proposal	PLan Counter-Proposal	Planning & Environmental Justification
		minimum lot calculations.	
Clause 6.2.2 & 5.2.4.5 <i>(Frontage & Access)</i>	Reduces minimum street frontage from 13 m to 12 m for 450 m²–600 m² lots, requiring a 6.5 m continuous kerb frontage.	Require a minimum 15m frontage for all infill subdivisions in established suburbs.	Narrow 12 m frontages lead to crossover dominance, removal of street trees, loss of kerbside parking, and degraded streetscape amenity.

Key Guardrail Principles

- **Mandatory Infrastructure Pre-conditions:** Development consent must not be granted under Clause 4.2 or 6.2.1 without written verification from PWC and the relevant municipal council confirming that water, sewerage, power, and stormwater systems can support the additional load without degrading existing service levels.
- **No Statutory Discretionary Creep:** Delete all clauses permitting 10% variations on minimum lot size and density. Allowing statutory exceptions down to 405 m² turns a temporary concession into the practical development baseline.
- **Climate & Canopy Mandate:** Insert explicit site coverage and deep-soil landscaping standards into Clause 5.4.8 to guarantee that at least 30% of any infill site remains unpaved deep soil capable of supporting mature shade trees.

Section 3: Strategic Statutory Pathways & Submission Framework

Part A: Recommended Strategic Statutory Pathways

Rather than pursuing broad amendments to Parts 4, 5, and 6 of the NTPS across all Zone LR land, PLan advocates for a controlled, precinct-led statutory framework that protects community amenity and prevents infrastructure overload:

- **Targeted Precinct Infill Overlays:** Replace universal density relaxations with location-specific overlays tied directly to Area Plans. Infill must be confined to designated corridors around activity centres and high-frequency transport routes where infrastructure capacity is proven.
- **Mandatory Infrastructure Concurrence:** Establish a statutory pre-condition requiring formal written concurrence from Power and Water Corporation (PWC) and the relevant municipal council before any merit assessment application for increased density can be accepted.
- **Local Government Alignment & Opt-Out Provisions:** Respect municipal autonomy by providing explicit opt-out mechanisms for rural/lifestyle municipalities (such as Litchfield Council) and requiring formal Memorandums of Understanding (MoUs) with local councils prior to precinct designation.
- **Developer-Funded Headworks Mandate:** Formally embed the requirement that proponents fund 100% of required power, water, sewer, and stormwater network upgrades, preventing cost-shifting onto ratepayers and local councils.
- **Staged Implementation & Monitoring:** Implement infill changes through pilot precincts with mandatory 2-year review periods to assess tree canopy loss, traffic congestion, kerbside parking impacts, and stormwater runoff before broader rollout.

Part B: Core Submission Demands

1. **Infrastructure Pre-conditions:** Require formal utility capacity certification prior to development application acceptance.
2. **Protection of Suburban Liveability:** Preserve default 800 m² minimums in established suburbs to maintain deep-soil canopy and amenity.
3. **Statutory Integrity:** Eliminate discretionary 10% variations on lot size and density.
4. **Place-Based Growth:** Limit higher density typologies (Dwelling-group and Dwelling-multiple) to strategic, infrastructure-ready precincts rather than allowing ad-hoc developments across all Zone LR land.

From: [REDACTED]
To: [Das NTG; NT Planning Commission](#)
Cc: [REDACTED]
Subject: Proposed Planning Scheme Amendment PA2026/0205 - changes to Zone LR (Low Density Residential)
Date: Friday, 21 August 2026 11:23:49 PM

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

21.8.2026

The Manager,
Development Services,
Department of Lands, Planning
and the Environment,
Cavenagh Street,
Darwin, NT. 0800

Dear Sir/Madam,

1. SUBMISSION

This submission is in response to the proposed Planning Scheme Amendment, responding initially to Item PA2026/0205, in the Development Planning Notices in which is currently listed as inviting public comments.

It is also intended as the subject for inclusion in a hearing by the Planning Commissioner, who will prepare a report for the Planning Minister.

2. MAIN COMMENT

This proposal if endorsed would have a very wide - ranging effect across many parts of the Northern Territory. It is my view that it would have a very upsetting effect amongst the present population.

3. IMPACT OF THE PROPOSED CHANGE TO ZONE LR (Low Density Residential)

The present NT PLANNING SCHEME is a product of years of fine tuning.

Many suburban homes are built on 800 square meter lots (or near that size). Reducing ZONED LR lots down to a standard 450 square meter lots in the suburbs would not be acceptable.

There are so many different ways such an action would not be acceptable to our Territory residents.

We only need to look at the streets of homes in established suburbs to understand that.

A major issue is that the infrastructure would not stand the doubling up of so many extra users, and we live in a hot tropical area.

Planning for humans is not a desk top activity. A great deal of issues need attention. Space is needed to live. The public must be properly considered about plans for our future.

Regards,

Miss Margaret A Clinch,
[REDACTED]
Brinkin, NT.

[REDACTED]

From: [Nicholas Kirlew](#)
To: [Planning NTG](#); [Das NTG](#); [NTPlanning Commission](#)
Cc: [Trudy Campbell](#)
Subject: RE: Failed to lodge
Date: Saturday, 22 August 2026 8:22:00 AM
Attachments: [image001.png](#)
[Zone LR Planning Amendment PA2026.docx](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello Das,

Please see below, submission was unable to be loaded to the web site.

Ple4ase acknowledge receipt.

Regards,

Nick Kirlew

Convener **PLan: the Planning Action Network Inc** M: 0447 499 794 E:

nick@planinc.org.au W: www.planinc.org.au

Power in Numbers: Join our network to ensure the Darwin community remains a force too big to be ignored. [Sign up here.](#)

From: Trudy Campbell <trudy@citizensparty.org.au>

Sent: Friday, 21 August 2026 11:19 PM

To: Nicholas Kirlew <nick@planinc.org.au>

Subject: Failed to lodge

Importance: High

Hi Nick,

The site would not allow me to create an upload. Its 11:16pm, I've conceded defeat and sent it to you, such as it is.

Kind regards,

Trudy Campbell

Australian Citizens Party



PO Box 227

Berry Springs

NT 0838

MOBILE: 0414677968

Email: trudy@citizensparty.org.au

To: Development Assessment Services / Minister for Infrastructure, Planning and Logistics

Subject: Submission on Proposed Planning Scheme Amendment PA2026/0205 – Zone LR Infill & Subdivision

Full Name: Trudy Ann Campbell

Address : PO Box 227, Berry Springs. NT 0838

Email: trudycec@outlook.com

RE: Public Exhibition of Amendment PA2026/0205 (Zone LR Changes)

I am writing to lodge a formal submission regarding proposed Planning Scheme Amendment PA2026/0205. While I recognize the need for diverse housing options in the Northern Territory, I have strong concerns regarding the blanket implementation of 450 m² minimum lot sizes and battle-axe subdivisions in Zone LR without adequate evidentiary support.

My key concerns are as follows: Infrastructure Constraints: Blanket density increases without prior infrastructure upgrades risk network overload, traffic congestion, and delayed developer-funded fixes.

There is such diversity in water flows, tidal surges, monsoonal downpours across the NT. What soil erosion will occur with a 10m wide battle-axe and/ or 250m driveway?

2. Neighbourhood Character and Tree Canopy:

- Who will fund the bracing of the large canopy trees, rather than cut them down?

Mention impacts on urban heat, shade loss, privacy, or back-block overdevelopment.]

3. Strategic vs. Blanket Infill:

What is the actual number of vacant homes/ units across the NT?

What will be the impact on Council rates?

Who foots the bill for the changes of block area, in the worst cost of living crisis in our country's history?

Who actually benefits from this supposed solution to affordable / social housing needs in the Territory, foreign investors, the banks ?

Recommendation:

I request that the Minister defer approval of PA2026/0205 until:

- Detailed infrastructure capacity assessments are conducted for each Zone LR locality.
- Place-based infill plans are developed in consultation with local communities.
- Strict tree canopy retention standards and urban heat mitigation rules are integrated into the amendment text.

Thank you for considering this submission.

Date: 19/08/2026: Trudy Campbell

Submission Guide

Key Arguments & Talking Points for Your Submission

You do not need to address every point—pick 2 to 4 issues that matter most to your household or local community:

1. Lack of Infrastructure Assessment

- **Point:** The proposal relies heavily on existing reticulated infrastructure (water, sewerage, power, stormwater, and road networks) without presenting any suburb-by-suburb capacity modeling.
- **Argument:** Suburb infrastructure in established Territory areas is aging. **2. Territory-Wide “Blanket” Approach vs. Place-Based Planning**
- **Point:** The amendment applies uniformly across all Zone LR land in the NT, regardless of local terrain, street layout, or proximity to public transport and services.
- **Argument:** Density should be introduced through strategic, place-based planning around town centers and transport hubs, rather than an uncoordinated, site-by-site reduction in minimum lot sizes across every suburb.

3. Unproven Housing Affordability & Supply Benefits

- **Point:** The explanatory documents assert that reducing lot sizes will fix housing challenges, but provide no NT-specific economic data, supply estimates, or pricing models.
- **Argument:** Smaller lot sizes increase land yield for developers but do not guarantee affordable sales prices or lower rents. High construction and finance costs in the NT remain unaddressed by planning rule changes alone.

4. Loss of Tree Canopy, Neighborhood Character, and Urban Heat

- **Point:** Replacing large 800 m² garden blocks with dual 450 m² lots reduces open ground, deep soil zones, and mature tree canopy.
- **Argument:** The NT suffers severe urban heat island effects. High-density infill without strict canopy preservation rules will increase local ambient heat, compromise privacy, and permanently alter low-density suburban character.

5. Reliance on Ad-Hoc Development Assessment

- **Point:** Broader strategic concerns are deferred to individual development applications rather than resolved upfront.
- **Argument:** Ad-hoc assessment fails to capture cumulative impacts (e.g., 10 battle-axe lots on a single narrow street creating severe parking and traffic issues over time).

Submission Template

Suggested template below for your formal response:

Subject:

FW: Proposed Planning Scheme Nightcliff

From: [REDACTED]

Sent: Friday, 21 August 2026 4:21 PM

To: Das NTG <Das.NTG@nt.gov.au>

Subject: Fwd: Proposed Planning Scheme Nightcliff

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

Please find below an email that was sent to Ed Smelt regarding the proposed planning scheme for Nightcliff.

It is a definite NO from us.

Thank you,

Michael and Karen Schipp

[REDACTED] Nightcliff

On Tue Aug 11 2026 <schippfamily@bigpond.com> wrote:

----- Original Message -----

Hello and good morning Ed and team,

Thank you for the leaflet drop and making the community aware.

My husband and I do NOT agree with the proposed changes. It is a concern.

If you could use this email as feedback to the government, that would be great.

Thank you and all our best,

Karen and Michael Schipp

[REDACTED] Nightcliff

ph: [REDACTED]

13 August 2026

Joanna Townsend
Chief Executive Officer
Department of Lands, Planning and Environment
Northern Territory Government
GPO Box 1680
Darwin NT 0810

RE: - Proposed Planning Scheme Amendment - Infill Development and Subdivision within Zone LR

Dear Chief Executive Officer

The Australian Institute of Architects Northern Territory Chapter welcomes the opportunity to comment on the proposed amendments to the Northern Territory Planning Scheme 2020 to facilitate infill development and subdivision in Zone LR (Low Density Residential).

The Chapter supports the intent of the amendment and recognises the important role that infill development can play in increasing housing supply, improving housing choice and making more efficient use of existing serviced land and urban infrastructure. These objectives are consistent with the Institute's broader housing policy positions and our recent submission to the Northern Territory Housing Strategy, which supported greater housing diversity and well-designed infill and medium-density housing as part of a coordinated response to the Territory's housing challenges.

The Chapter notes that the proposed amendments seek to enable a broader range of housing outcomes by reducing minimum lot sizes and permitting dwelling-group and dwelling-multiple developments within Zone LR, subject to assessment and approval. We support initiatives that provide opportunities for additional housing in established suburbs and recognise that a more diverse housing mix can assist in improving affordability and housing choice for Territorians. The proposal's continued reliance on development assessment processes, including requirements relating to setbacks, open space, landscaping, building design and amenity, is an important safeguard in achieving appropriate outcomes.

However, the Chapter emphasises that increased density should be accompanied by high-quality design outcomes. Housing supply and density are important objectives, but they should not come at the expense of liveability, climate responsiveness, landscape character or long-term community amenity. In the Northern Territory context, access to private open space, deep soil zones, tree canopy, shade, natural ventilation and opportunities for outdoor living are particularly important considerations.

The Chapter notes concerns raised by members regarding the cumulative impacts of increasing density in emerging and established suburbs where **service** infrastructure capacity may already be under pressure. In particular, consideration should be given to the capacity of power, water and other essential infrastructure networks to support additional development as infill opportunities are realised. While the explanatory material notes that infrastructure upgrades may be required and that associated costs may be borne by the developer, ongoing monitoring and coordination of infrastructure planning will be critical to ensure housing growth does not outpace servicing capacity.

The Chapter also encourages a focus on housing diversity rather than simply smaller lots supporting increasingly large building footprints. In some locations, better outcomes may be achieved through thoughtfully designed duplexes, attached housing or two-storey housing forms that preserve open space, landscaping opportunities and urban tree canopy, rather than large, detached dwellings occupying the majority of a reduced lot. The objective should be density done well, delivering both additional housing and high-quality neighbourhood outcomes.

Accordingly, while the Chapter supports the proposed amendments in principle, we encourage the Northern Territory Government to continue monitoring infrastructure capacity and to ensure that implementation of the new provisions promotes high-quality design, meaningful landscaping, housing diversity and climate-responsive development outcomes.

The Institute appreciates the opportunity to provide comment and would welcome continued engagement as the proposed reforms progress.

Your sincerely

A handwritten signature in blue ink, appearing to read 'Miriam Wallace', with a stylized, cursive script.

Miriam Wallace
President, NT Chapter
Australian Institute of Architects



Proposed amendment to the Northern Territory Planning Scheme 2020

Infill development and subdivision in Zone LR (Low Density Residential)

Submission by AILA Northern Territory Chapter

19 August 2026

1. Introduction

The Australian Institute of Landscape Architects (AILA) is the peak professional body for landscape architecture in Australia. The Northern Territory Chapter represents members practising throughout the NT in urban, rural and remote communities across private practice, local government and the Territory Government.

AILA NT welcomes the opportunity to comment on the proposed amendment to the Northern Territory Planning Scheme 2020 (the Planning Scheme) to reduce the minimum lot size in Zone LR to 450m², to allow a broader range of housing types including duplexes and townhouses, and to permit battle-axe lots. The Chapter acknowledges that the amendment responds to the Northern Territory Planning Commission's review and community consultation undertaken in December 2025.

The Chapter also acknowledges the broader policy context: a genuine and pressing need for housing supply, diversity and affordability across the Territory, and the public interest in making better use of established urban land and existing infrastructure.

Summary Position

AILA NT supports the objectives of the amendment. AILA NT does not support the amendment in its current form.

The reason is straightforward. In the NT, lot size is not only a housing supply variable; it is a key determinant of how much soil, root volume, shade and infiltration capacity a neighbourhood retains. In established suburbs of Darwin, Palmerston, Katherine, Alice Springs and Tennant Creek, much of the urban canopy is located on private land, rather than in parks or road reserves. Reducing minimum lot sizes, increasing site coverage through attached and multiple dwellings, and enabling battle-axe subdivision will reduce the private land available to perform these functions. Unless the Planning Scheme is amended at the same time to secure a minimum landscape performance on each lot, the amendment risks delivering more dwellings within a hotter, drier, less resilient and less liveable low density residential fabric.

This is not an argument against density. Density is not the problem. Density without a landscape performance framework is the problem, and it is a problem the Territory can avoid without materially compromising housing supply by incorporating a small number of clear, measurable and self-assessable landscape provisions into the amendment.

AILA NT therefore offers this submission as constructive input to the amendment rather than an objection to its objectives.

The twelve recommendations in Section 2 and the Model Provisions in Section 7 are intended to provide practical measures capable of incorporation within the current amendment process.



2. Recommendations

No.	Recommendation	Proposed Planning Scheme Location
R1	Introduce a mandatory deep soil zone for all lots below 600m ² : a minimum of 15% of site area, unbuilt, unroofed and unpaved, with a minimum dimension of 3m and at least one contiguous area of 25m ² capable of supporting a medium tree.	Part 6 – Subdivision; Zone LR residential development provisions
R2	Set a lot-scale canopy provision: a minimum of one medium tree (8–15m mature height) or two small trees (<8m) per new lot below 600m ² , and a lot canopy cover target of 20% at ten years and 30% at maturity.	Zone LR residential development provisions
R3	Require a landscape plan prepared by a suitably qualified professional for any subdivision that creates lots below 600m ² , all battle-axe subdivision, and all duplex, townhouse, group and multiple dwelling development in Zone LR.	Part 6; Part 5 assessment requirements
R4	Draft the landscape provisions as measurable deemed-to-comply criteria so that they operate as a precondition of the exempt pathway, rather than as discretionary matters for consideration.	Zone LR exemptions and Part 5
R5	Adopt specific controls for battle-axe submission: minimum 4.5m handle width with a minimum 1.2m pervious landscaped strip and a shade tree at the street end; rear lot area calculated exclusive of the handle; a cap on crossovers per length of street frontage.	Part 6 – Lot Size and Configuration
R6	Introduce provisions for the retention of significant and mature trees, with a replacement or offset requirement where removal is unavoidable, applying at subdivision as well as at development stage.	Part 6; Part 5; overlays
R7	Adopt a Green Factor-style landscape performance score for infill lots, aligned with the City of Darwin Green Factor Tool now in development, so that a single measurable figure carries deep soil, canopy, permeability and water outcomes.	New clause / technical note, coordinated with CoD
R8	Protect verges and street trees: cap crossover widths, require no net loss of street trees per frontage, and coordinate service corridors so that viable tree pits remain available on narrowed verges.	Part 6 – Infrastructure; council technical standards
R9	Require on-site stormwater detention and water sensitive urban design sized to achieve no net increase in peak discharge or pollutant load where site permeability is reduced.	Part 6 – Site Characteristics and Infrastructure
R10	Apply a public open space test so that, where cumulative infill within a catchment exceeds a defined threshold, a contribution is triggered toward the shading, irrigation and upgrade of existing public open space.	Part 6 – Infrastructure and Community Facilities
R11	Establish a baseline canopy and permeability audit for all Zone LR land, with five-yearly reporting, so that cumulative change can be measured rather than inferred.	Implementation and monitoring



No.	Recommendation	Proposed Planning Scheme Location
R12	Apply the amendment through area plans and locality-specific provisions rather than a single Territory-wide change, recognising the distinct climates and landscape characters of Darwin, Palmerston, Katherine, Tennant Creek, Alice Springs, Humpty Doo and Batchelor.	Strategic Framework; area plans

3. The Territory Context: Why Landscape Performance Matters

Heat

Darwin, Palmerston and Katherine sit in a tropical savanna climate where high humidity limits both evaporative cooling of surfaces and the human body's capacity to shed heat. In this climate, shade is not simply one mitigation measure among several; it is one of the most effective interventions available at the scale of a residential street. Material substitution, lighter roofs and reflective pavements can assist, but tree canopy provides the additional benefit of intercepting solar radiation before it reaches the ground and surrounding built surfaces.

CSIRO work through the Darwin Living Lab has recorded surface temperatures in unshaded hardstand and car parking in Darwin exceeding 65°C. The temperature differential between shaded and unshaded ground in Darwin is of an order that changes whether a space is usable at all during the middle of the day for eight months of the year.

Alice Springs and Tennant Creek face the same question from the opposite direction: extreme summer maxima combined with severe water constraint. There, a smaller lot reduces both the space available for an established shade tree and the landscape area available to sustain it. A single Territory-wide lot size therefore produces very different landscape outcomes in Darwin and in Alice Springs, and the amendment should not assume otherwise.

Cyclone Resilience

Tree resilience in cyclonic winds is strongly influenced by root system development, which in turn depends on the soil volume and unconstrained root space available to the tree. This is the point most often missed in the density debate. Smaller lots, higher site coverage, slab-on-ground construction close to boundaries and battle-axe driveways do not simply reduce the number of trees a suburb can support; they can also constrain root development and increase the vulnerability of retained trees to windthrow.

A recent AILA NT Tech Talk on the Casuarina Aquatic and Leisure Centre demonstrated how tree pits were set out using a federated 3D model to secure adequate root volume and clearance from buildings, infrastructure and underground services. Every new tree on the site survived Tropical Cyclone Fina in November 2025, approximately 18 months after planting. The outcome demonstrates the importance of securing adequate soil volume at design stage alongside appropriate species selection and establishment.

AILA NT recommends that soil volume be treated as a planning requirement rather than a design aspiration, and that the amendment also consider practical post-event matters that can become more difficult on smaller lots following cyclonic events: on-site green waste laydown, generator and service access, and vehicle movement for debris clearance.

Wet Season Stormwater

Reducing permeable site area in a monsoonal climate has an immediate hydraulic consequence. Much of Darwin's established Zone LR land is served by reticulated drainage designed for a different site coverage and discharging to sensitive receiving environments - Rapid Creek, Ludmilla Creek, Darwin Harbour and their fringing mangrove and saltmarsh systems. Lot-by-lot reductions in permeability may appear minor individually but become significant cumulatively, and the Planning Scheme currently has no mechanism to measure that cumulative change.



4. Detailed comments on the proposed changes

Reduction of the minimum lot size to 450m²

AILA NT does not object to a 450m² minimum in principle. The Chapter objects to a 450m² minimum unaccompanied by a deep soil requirement.

The critical distinction is between private open space and deep soil. Private open space, as currently framed, may be roofed, paved or occupied by structures and still count. It is a measure of amenity, not of landscape function. Deep soil - unbuilt, unroofed, unpaved and free of tanks and services - provides the soil volume necessary to support canopy, infiltration, cooling and habitat. On larger lots, sufficient residual area has traditionally remained available to provide meaningful areas of deep soil. On a 450m² lot with a four-bedroom footprint, a double garage, a driveway and a service yard, it is entirely possible to satisfy every current provision of the Planning Scheme and retain no area capable of growing a shade tree.

Recommendations

R1, R2 and the model provisions at Section 7 address this directly.

Duplexes, townhouses and other attached housing

The Chapter supports greater housing diversity in Zone LR. The landscape risk in attached housing is site coverage creep: as the number of dwellings on a site rises, private open space, deep soil and setback planting can progressively be traded away, while the cumulative landscape impact is not necessarily assessed as a whole.

Recommendations

- Set a maximum site coverage for attached and multiple dwelling forms so that deep soil, private open space and canopy requirements can be satisfied simultaneously, without relying on the same area to meet multiple requirements.
- Require that a defined proportion of private open space be at ground level, unroofed and pervious.
- For group and multiple dwellings, permit deep soil to be provided communally where this produces a better outcome than fragmenting it across individual courtyards. For instance, a single consolidated deep soil area supporting two canopy trees may deliver a stronger landscape outcome than six fragmented courtyard strips.

Battle-axe lots

Of the changes proposed, battle-axe subdivision presents the greatest landscape risk and warrants specific provisions rather than reliance on the general Zone LR controls.

- The handle is typically three to four metres wide and, where constructed as full-width hardstand, runs the depth of the front lot. It provides no canopy, absorbs and re-radiates heat adjacent to both dwellings, and generates runoff along its length.
- Each battle-axe generally requires an additional crossover, permanently reducing verge planting opportunity and, in some cases, requiring the removal of an existing street tree. The verge is public land providing a public benefit; the amendment could reduce that capacity incrementally, lot by lot, without assessment of the cumulative effect on the street.
- The rear lot has no direct street frontage and therefore has limited direct benefit from street tree canopy.
- Servicing considerations compound the problem: waste collection, emergency vehicle access and post-cyclone debris removal all require maneuvering space that competes with planting.
- Concealed rear access raises passive surveillance and safety questions that are best resolved through sightline and lighting design at subdivision stage, consistent with second generation CPTED principles.

Recommendations

R5 sets out the Chapter's proposed controls. The Chapter notes that a 4.5m handle with a 1.2m landscaped strip is achievable within a standard subdivision layout and delivers a shade tree at the street end at negligible cost to yield.

Cumulative canopy loss and neighbourhood character

The character of Darwin's post-Tracy suburbs is carried by landscape, not by architecture. It is produced by generous setbacks, elevated dwellings, dense private garden canopy and mature street trees. Character controls that regulate



only building form, height and setback will not, on their own, protect this character because landscape is a fundamental component of it.

This matters for the amendment in a specific way. Landscape character is lost incrementally and irreversibly. No individual application removes a suburb's canopy; the two hundredth application does. An application-by-application assessment framework can make this cumulative transition difficult to identify until substantial change has already occurred. Recommendation R11 proposes a baseline canopy and permeability audit precisely so that the Territory has a number to govern by.

The Chapter further notes that character varies sharply across the zone. The elevated tropical garden suburbs of Nightcliff and Rapid Creek, the newer estates of Palmerston, the arid river-corridor character of Alice Springs and the small pockets in Humpty Doo and Batchelor are not a single condition. Recommendation R12 proposes that the amendment be delivered through area plans and locality-specific provisions.

Street trees, verges and crossovers

Infill transfers landscape demand from private land to public land at the same moment as it reduces the public land available to meet it. More dwellings per street means more crossovers, more service connections, more on-street parking and narrower effective verges - and simultaneously more residents relying on street trees for the shade their own lots no longer provide.

AILA NT recommends that the amendment be accompanied by a requirement for no net loss of street trees per frontage, caps on crossover width, and coordination of underground service corridors so that viable tree pits remain available. The Chapter also notes that the amendment is likely to increase street tree maintenance obligations for the City of Darwin, City of Palmerston, Katherine Town Council, Barkly Regional Council and Alice Springs Town Council, without a corresponding mechanism to address that additional maintenance burden. AILA NT recommends that this consequence be considered explicitly as part of the amendment.

Stormwater and water sensitive urban design

Recommendation R9 proposes that reduced permeability trigger a proportionate on-site response. In practice this means detention or retention sized to achieve no net increase in peak discharge, permeable paving where hardstand is unavoidable, rainwater harvesting directed to landscape irrigation, and treatment appropriate to the receiving environment. In the Top End the design event is not marginal, and in Central Australia the same provisions carry a second benefit by making irrigation water available to the canopy the zone will need.

Public open space

As private open space contracts, demand on public open space rises - for play, for exercise, for shade, for gathering and for the simple ability to be outdoors. The suburbs most likely to infill under this amendment are established suburbs whose public open space provision was calculated against a lower dwelling yield.

AILA NT recommends an explicit public open space test (R10). The Chapter emphasises that the response required is not primarily the acquisition of new land. It is investment in the shading, irrigation, planting and amenity of existing parks so that they can carry substantially higher use. An unshaded park in Darwin in October is not open space in any functional sense.

Connection to Country, biodiversity and cultural landscape

Urban Darwin retains remnant vegetation, significant trees and habitat corridors of real ecological and cultural value, including flowering and fruiting canopy trees that support nectar- and fruit-feeding birds and bats, and coastal mangrove and saltmarsh edges. Alice Springs retains the Todd River corridor and its river red gums. These are not incidental to the residential zone; in many suburbs they are the reason the residential zone is habitable.

AILA NT recommends that the amendment include a significant and mature tree retention provision (R6), and that planting provisions recognise locally provenanced and culturally significant species, including bush tucker and Larrakia plantings in the Darwin region, developed in consultation with Traditional Owners.

Equity and heat vulnerability

Smaller lots are, by design and by intent, the more affordable product. The households that occupy them are therefore, on average, less able to absorb higher cooling costs and less able to retrofit shade. If the amendment proceeds without landscape provisions, its predictable distributional effect is that the households with the least



capacity to respond will be allocated the hottest lots with the least canopy and the highest air conditioning load. AILA NT considers that this outcome is avoidable and that avoiding it is a legitimate purpose of the Planning Scheme.

Assessment pathway and capability

A substantial proportion of single dwelling development in Zone LR proceeds without consent where it complies with the relevant provisions. This is a sound arrangement and the Chapter does not propose to disturb it. It does, however, mean that if the landscape provisions recommended in this submission were drafted as discretionary matters for consideration, they would have no effect on the majority of development the amendment enables, because that development is never assessed.

Recommendation R4 is therefore central. AILA NT asks that the landscape provisions be drafted as clear, numerical, self-assessable deemed-to-comply criteria - a deep soil percentage, a minimum dimension, a tree number, a soil volume, a permeability figure. Framed this way they add no assessment time, no discretion and no delay. They simply set the floor beneath which the exemption does not apply.

5. Alignment with AILA policy

The positions in this submission are consistent with and informed by AILA's national policy and position statements, which are publicly available at aila.org.au:

- **Green Infrastructure Position Statement** - green infrastructure as a strategically planned network delivering environmental, social and economic benefit, and requiring formal recognition in planning instruments rather than discretionary treatment.
- **Cooling Cities - Urban Heat Island Effect Position Statement** - urban heat as a public health issue driven by heat-absorbing surfaces and the absence of shade and green space.
- **Climate Positive Design Position Statement and Action Plan** - mitigation through good planning and design, including the substitution of green infrastructure for concrete-intensive grey infrastructure, and the carbon value of healthy tree growth.
- **Adaptation to a Changing Climate Position Statement** - the built environment's obligation to design for the climate that is arriving rather than the one recorded.
- **Biodiversity Positive Design Position Statement and Guide** - recognition that Australia's densest concentrations of threatened species occur in and around urban areas, and that habitat loss is the primary driver of decline.
- **AILA's Climate and Biodiversity Emergency Declaration (2019)** and its endorsement of the IFLA Climate Action Commitment.
- **Child Friendly Cities and the Play in the Urban Landscape policy** - children play anywhere, not only in purpose-built playgrounds, and shrinking private and public outdoor space narrows where that is possible.
- The AILA-led Standards Australia Urban Green Infrastructure Handbook - nationally consistent terminology and a practical framework for setting and measuring progress against green infrastructure targets, integrable with planning instruments.
- AILA's national call for canopy cover and understorey targets - clear, defined and measurable goals in place of aspirational language.

Read together, these establish a consistent national position: green infrastructure performs a role equivalent to grey infrastructure and should be secured through the same instruments - mandated, dimensioned and measured - rather than left to the residual space after built form is resolved.

6. The role of landscape architects in smaller lot development

Landscape architects are often engaged after subdivision layout is fixed, at which point many of the decisions that most affect landscape performance have already been made. The decisions that matter - lot orientation for breeze and shade, the location of deep soil, retention of existing trees, service alignment and the relationship between verges and crossovers - are fundamentally subdivision decisions.

Early landscape input at subdivision stage is inexpensive relative to its effect. Retrofitting canopy into a completed small lot subdivision is expensive, slow and frequently impossible, because the soil volume was allocated to something else fifteen years earlier.



Specific contributions landscape architects can make to the implementation of this amendment include:

- Subdivision layout testing - demonstrating, through concept lot configurations, that 450m² lots can accommodate a compliant dwelling and a functioning deep soil zone, or identifying where they cannot.
- Soil volume and structural soil design, including root cell systems where planting must occur beneath or beside pavement.
- Tree retention assessment and protection specification at subdivision stage.
- Street tree master planning coordinated with underground services, drawing on approaches previously applied through the City of Darwin's Tree Advisory Committee.
- Water sensitive urban design integrated with landscape rather than added as a separate hydraulic element.
- Species selection for cyclone resilience, tropical and arid conditions, and cultural significance.

AILA NT recommends (R3) that a landscape plan prepared by a suitably qualified person be required for any subdivision creating lots below 600m², for all battle-axe subdivision, and for attached and multiple dwelling development in Zone LR. The Chapter can advise on an appropriate qualification standard.

7. Model Provisions

The following provisions are offered as drafting assistance. They are expressed as measurable criteria capable of operating within a deemed-to-comply pathway. The proposed figures are offered for testing and refinement and should not be read as fixed positions.

Provision	Suggested drafting	Rationale
Deep soil zone	Not less than 15% of site area, in one or more areas with a minimum dimension of 3m, of which at least 25m ² is contiguous. Deep soil is unbuilt, unroofed, unpaved and free of structures, tanks and services.	Reduces reliance on private open space, which may currently be roofed or paved and therefore may perform little or no soil-based landscape function.
Soil volume for trees	A medium tree is to be provided with not less than 20m ³ of usable soil volume; a small tree not less than 10m ³ . Structural soil or root cell systems may contribute where soil is beneath pavement.	Adequate soil volume is fundamental to a tree reaching a useful shade size and developing a root system capable of greater resilience in cyclonic conditions.
Site coverage	Maximum site coverage for lots below 600m ² to be set so that deep soil, private open space and canopy provisions can be satisfied simultaneously rather than competing for the same area.	Without an appropriate site coverage control, the same area may be relied upon to satisfy multiple requirements on paper.
Battle-axe handle	Minimum handle width 4.5m, comprising a trafficable width and a landscaped strip of not less than 1.2m planted with a shade tree at the street end. Handle area is excluded from the calculation of rear lot area.	Where provided as full-width hardstand, the handle contributes to heat gain, provides no canopy and occupies frontage that might otherwise support street tree planting.



8. Model Provisions

The following provisions are offered as drafting assistance. They are expressed as measurable criteria capable of operating within a deemed-to-comply pathway. The proposed figures are offered for testing and refinement and should not be read as fixed positions.

Provision	Suggested drafting	Rationale
Crossovers	Not more than one additional crossover per street frontage without demonstration that street tree capacity and verge planting are not reduced. Maximum crossover width to align with council technical standards.	Each crossover typically removes six to eight metres of verge planting opportunity permanently.
Tree retention	Existing trees with a trunk diameter at breast height of 300mm or greater are to be retained where practicable. Removal triggers replacement at a defined ratio or a contribution to street tree planting in the same suburb.	Established canopy cannot be replaced within a planning horizon; a semi-mature replacement takes fifteen to twenty-five years to deliver equivalent shade.
Permeability	Not less than 30% of site area to remain permeable, inclusive of the deep soil zone. Permeable paving may contribute at a discounted rate.	Wet season rainfall intensity in the Top End means that reduced permeability is felt immediately in reticulated drainage and receiving waters.
Landscape plan	A landscape plan prepared by a suitably qualified person, showing deep soil, tree locations and mature spread, soil volume, permeable area and stormwater treatment, to accompany all relevant applications.	Makes the provisions auditable at lodgement rather than discoverable at completion.

AILA NT further recommends (R7) that the Territory consider a Green Factor - style landscape performance score as an alternative or complementary mechanism. A Green Factor tool converts deep soil, canopy, permeability, water management and planting quality into a single weighted score that a proponent can satisfy in whichever combination suits their site. It offers more design flexibility than prescriptive minimums while still setting an enforceable floor. The City of Darwin is currently developing a Green Factor Tool with AILA NT technical input, and the Chapter would welcome the opportunity to discuss its potential application to Zone LR infill before the two instruments diverge.

9. Conclusion

AILA NT supports more housing, more housing diversity and better use of established urban land in the Northern Territory. The Chapter's concern is not with the amendment's purpose but with its silence on landscape performance, and that silence is straightforward to remedy.



The provisions proposed in this submission are intended to protect landscape performance without materially undermining the additional housing yield the amendment seeks to unlock. They would help ensure that the neighbourhoods produced remain habitable in a climate that is becoming less forgiving; that existing canopy is not lost lot by lot without its cumulative loss being measured; and that more affordable housing is not delivered at the expense of shade, landscape amenity and climate resilience.

The Chapter thanks the Commission and the Department for the opportunity to contribute.

Marisa Fontes
AILA NT President, FRLA
Australian Institute of Landscape Architects (AILA)

AILA NT acknowledges the Traditional Owners of the numerous lands to which this amendment applies across the Northern Territory - and their continuing connection to land, water and community. This submission is prepared on Larrakia Country.

Mr Mark Coffey PSM
Chair, NT Planning Commission
GPO Box 1680
DARWIN NT 0801

ntpc@nt.gov.au

Dear Mr Coffey,

**Planning Institute of Australia Response on Infill Development and
Subdivision in Zone LR Report**

The Northern Territory Division of the Planning Institute of Australia (PIA) welcomes the opportunity to comment on the proposed Planning Scheme Amendment (PSA) to the Northern Territory Planning Scheme 2020 (Planning Scheme), which seeks to facilitate infill development and subdivision within Zone LR (Low Density Residential).

PIA strongly supports the intent of the PSA and recognises the importance of increasing housing diversity, improving housing supply and making more efficient use of serviced urban land within established communities. These outcomes will support more sustainable urban growth patterns across the NT while responding to changing demographics and housing needs (i.e. smaller households, ageing in place, first home buyers, key workers, downsizers and multi-generational living), and maintaining the fundamental character and intent of low density residential areas.

The proposed PSA is broadly consistent with the NT Planning Commission's recommendations arising from its review of infill development and subdivision in Zone LR, and will help address housing availability challenges across the NT while retaining assessment mechanisms that consider local context and amenity impacts.

The following comments address the key elements of the proposed PSA.

Infrastructure Capacity

While PIA welcomes measures that increase development opportunities in existing urban areas, we remain concerned that infrastructure constraints may limit the practical effectiveness of the proposed reforms.

The PSA Explanatory Document acknowledges that increased development intensity may require upgrades to existing infrastructure and that not all lots will ultimately be capable of redevelopment despite being theoretically eligible under the proposed provisions.

PIA encourages the NT Government to consider undertaking a broad assessment of infrastructure capacity across affected urban areas and, where practicable, making relevant information publicly available. As an alternative or complementary mechanism, PIA suggests introducing a clear pre-lodgement process to enable early engagement with relevant service authorities and assist

proponents to better understand infrastructure constraints before lodging a development application.

This could include consideration of:

- sewer capacity;
- water supply infrastructure;
- drainage networks;
- transport infrastructure; and
- community service capacity.

Without a clear understanding of infrastructure constraints, there is a risk that the amendments will create expectations of redevelopment potential that cannot be realised through the development assessment process. This may result in unnecessary workload for both applicants and the planning system while delivering limited housing outcomes.

Merit Assessment Framework

PIA supports the proposal to classify dwelling-group and dwelling-multiple development as Merit Assessable within Zone LR. This approach appropriately balances the need to increase housing diversity with the need to ensure that new development responds to local context and maintains residential amenity. Allowing these housing forms through a development permit process ensures proposals continue to be assessed against design, amenity, open space, setbacks, height, and neighbourhood character considerations. The merit assessment framework strikes an appropriate balance between flexibility and community expectations. PIA considers that retaining public notification and assessment against the established objectives of the Planning Scheme is critical to maintaining community confidence in the planning system as these reforms are implemented.

Minimum Lot Size and Density Provisions

PIA supports the proposed reduction in minimum lot size from 800m² to 450m² and the introduction of a corresponding density control of one dwelling per 450m². These provisions establish a logical and transparent relationship between subdivision controls and development density outcomes. The proposed 10% variation mechanism also provides a reasonable degree of flexibility to respond to site-specific constraints while maintaining certainty regarding the intended scale of development within Zone LR. PIA supports the introduction of a defined upper limit to density variations as this provides greater certainty for applicants, decision makers and the broader community.

Battle-Axe Lots

PIA supports greater flexibility for battle-axe lots as part of a balanced approach to enabling infill development in established low density residential areas. Battle-axe subdivision can provide a practical mechanism to unlock underutilised land, support the retention of existing dwellings and deliver additional housing choice where:

- conventional street-front subdivision is not feasible or would result in poorer planning outcomes;
- a site has sufficient area and dimensions to accommodate functional access, parking, private open space and landscaping;
- battle-axe subdivision enables the efficient use of serviced urban land without compromising neighbourhood character or residential amenity;
- the arrangement supports the retention, adaptation or orderly redevelopment of an existing dwelling; and
- site-specific design responses can appropriately manage privacy, overlooking, service access, vehicle manoeuvring and stormwater drainage.

PIA considers that battle-axe lots should not be treated as an exceptional outcome only available in limited circumstances, but rather as one of several legitimate subdivision responses that may be appropriate following merit assessment. Clear performance-based criteria should be used to ensure that access handles are safe and legible, services can be efficiently provided, waste collection and emergency access can be addressed, and rear lots achieve a high level of residential amenity.

This approach would provide greater certainty for landowners and applicants while still ensuring that unsuitable proposals can be refused where site conditions cannot support an acceptable planning outcome.

Flood and Storm Surge Controls

PIA supports a cautious approach to subdivision, dwelling-group and dwelling-multiple development on land affected by Clause 3.6 (Land Subject to Flooding) and Clause 3.7 (Land Subject to Storm Surge), while noting that the suitability of infill development should be considered having regard to the specific location, nature and extent of the hazard constraint.

Given increasing awareness of natural hazard risks, PIA considers that the planning framework should continue to prioritise community safety and long-term resilience. However, a blanket exclusion may not be necessary in all circumstances where hazards are localised, manageable or capable of being addressed through site-specific design, engineering or development conditions. PIA therefore encourages an approach that enables appropriate infill outcomes where detailed assessment demonstrates that risk can be acceptably managed without compromising public safety, emergency access, infrastructure performance or neighbouring properties.

Urban Design and Neighbourhood Character

While PIA supports increasing housing choice within Zone LR, it remains important that future development delivers positive urban design outcomes that contribute to the character and amenity of established neighbourhoods. PIA encourages the Northern Territory Government to continue monitoring the effectiveness of the existing residential design requirements, including:

- private open space standards;
- building articulation requirements;
- landscaping provisions;
- setback and privacy controls; and
- residential building design requirements.

As uptake of the new provisions occurs, further refinement of design controls may be necessary to ensure infill development achieves high-quality built form outcomes and community acceptance.

In summary, PIA supports infill development and subdivision within Zone LR and considers the PSA represents an appropriate and measured response to housing supply challenges facing the NT. The proposed reforms will improve housing choice and enable more efficient use of existing serviced urban land while maintaining a framework for assessment of site-specific impacts.

PIA reiterates the importance of infrastructure-informed implementation and encourages the NT Government to prioritise the identification and communication of infrastructure capacity constraints to ensure the proposed reforms translate into genuine housing outcomes.

PIA welcomes the opportunity to continue working collaboratively with the NT Government and other stakeholders as these reforms progress.

Should you wish to discuss any aspect of this submission, please contact Liza Valks, PIA Territory Manager, at nt@planning.org.au or by phone on 0438 527 821 or Rory Mackay PIA NT President on 0456 635 997.

Yours sincerely,



Rory Mackay MPIA
PIA NT President

17 August 2026

Lands Planning

Department of Lands, Planning and Environment

By email: planning.ntg@nt.gov.au

Dear Sir/Madam

SUBMISSION

Planning Scheme Amendment PA2026/0205

Infill development and subdivision in Zone LR (Low Density Residential)

PROPERTY COUNCIL POSITION: Support the amendment and proceed without delay, subject to targeted refinements on infrastructure, hazard overlays, battle-axe lots, assessment guidance and monitoring.

1. Executive summary

Property Council NT welcomes the opportunity to comment on Planning Scheme Amendment PA2026/0205. This follows our December 2025 submission and sustained advocacy for dual occupancy, well-managed urban infill and practical brownfield renewal.

The amendment substantially responds to the Property Council's earlier recommendations. It would make dwelling-group and dwelling-multiple merit assessable, reduce the minimum lot size from 800m² to 450m² with a 10 per cent variation to 405m², set a density of one dwelling per 450m², provide 12 metre frontage and 120m² building-envelope controls, and allow battle-axe lots in limited circumstances.

These are measured reforms, not wholesale rezoning. Development would remain low-rise under the existing 8.5 metre height limit and subject to merit assessment, public notification and existing amenity controls. The package provides a practical pathway for duplexes, smaller freehold lots, downsizing, multigenerational living and more attainable housing in established suburbs, while complementing greenfield delivery.

Subject to the refinements below, the Property Council recommends that the amendment be adopted and implemented promptly.

Summary of recommendations

- 1. Proceed with PA2026/0205**, and commence the new pathway promptly.
- 2. Retain an explicit servicing safeguard**, or clearly cross-reference the provision that requires connection to reticulated services and confirmation of network capacity.
- 3. Clarify the flood and storm surge provisions**, so the prohibition applies to hazard-affected development areas, access and services, rather than automatically sterilising an entire parent lot where safe, unaffected land can be demonstrated.
- 4. Refine the battle-axe lot test**, to cover site dimensions, configuration and existing development, and publish practical access and servicing standards.
- 5. Make the 10 per cent variation pathway clear and consistent**, and retain a pathway to consider 400m² lots in identified serviced and unconstrained areas.
- 6. Issue deemed-to-comply guidance and a standard application checklist**, with coordinated service-authority referrals and target assessment timeframes.

7. Review the reforms within 12–24 months, using published data on delivery, processing times, infrastructure conditions, design outcomes and unintended impacts.

2. Alignment with Property Council advocacy

The proposed amendment closely tracks the directions supported by Property Council NT in December 2025. The following table summarises the alignment and the remaining implementation issues.

Issue	Property Council position (Dec 2025)	PA2026/0205	Property Council response
Housing types	Enable dual occupancy, dwelling-group and dwelling-multiple in Zone LR.	Dwelling-group and dwelling-multiple become merit assessable and generally remain two storeys or less.	Support.
Lot size and density	450m ² baseline; support 400m ² in appropriate serviced and unconstrained areas; one dwelling per 450m ² .	450m ² minimum, with up to 10% variation to 405m ² ; one dwelling per 450m ² , with a 10% density cap.	Support, with clear variation criteria and a future or precinct-based 400m ² pathway.
Frontage and envelope	12m minimum frontage and a 120m ² building envelope.	12m frontage for 450–600m ² lots and an 8m × 15m envelope for lots of 450m ² and above.	Support.
Battle-axe lots	Allow where appropriate to unlock constrained sites and retain existing homes.	Allowed only where necessary due to site irregularity or to retain an existing dwelling.	Support in principle; broaden and positively frame the test and publish technical standards.
Amenity	Clear objective controls for height, setbacks, parking, open space, site coverage and design.	Existing controls continue, with relevant residential design and building articulation provisions applying.	Support; add deemed-to-comply guidance for consistent decisions.
Infrastructure and staging	Prioritise well-serviced, unconstrained areas and confirm infrastructure capacity.	Applies broadly across Zone LR, with hazard exclusions and developer-funded upgrades where needed.	Support the principle; retain an explicit servicing requirement and provide transparent capacity and cost guidance.

3. Detailed comments and recommended refinements

3.1 Enable low-rise housing diversity

Property Council NT strongly supports making dwelling-group and dwelling-multiple merit assessable in Zone LR. The present settings largely confine infill to a dwelling-single plus a dwelling-independent, leaving a gap in the market for duplexes, dual occupancy, attached homes and other low-rise “missing middle” options.

Merit assessment is an appropriate balance. It allows proposals to be tested against the purpose and outcomes of Zone LR, while retaining public notification and assessment of design, setbacks, height, parking, open space and impacts on adjoining properties. The pathway should, however, operate as a genuine implementation mechanism for the policy change and not become a de facto prohibition through inconsistent or overly discretionary assessment.

3.2 Lot size, density, frontage and building envelope

The Property Council supports the proposed 450m² minimum lot size and one-dwelling-per-450m² density. Aligning the subdivision and density controls creates a coherent framework and allows

comparable housing outcomes whether land is formally subdivided or developed as a dwelling-group or dwelling-multiple.

The proposed 10 per cent variation, allowing consideration of lots or density at 405m², materially responds to our earlier support for 400m² outcomes in appropriate locations. The variation should be supported by clear, objective criteria and treated as an intended performance pathway where a site is serviced, unconstrained and capable of accommodating access, parking, private open space, landscaping and a functional building envelope.

We also support the 12 metre frontage requirement and the 8 metre × 15 metre building envelope for lots of 450m² and above. The 120m² envelope directly reflects the functional-lot approach advocated by the Property Council and is preferable to relying on area alone.

To preserve the policy direction previously supported by the Property Council, Government should retain the ability to identify 400m² minimum lots in appropriate serviced and unconstrained locations through area plans, location-specific provisions or the 12–24 month review recommended below.

3.3 Infrastructure capacity and servicing

Infill reform must be supported by infrastructure capacity. Zone LR is intended for locations where full reticulated services are available, and the explanatory material recognises that additional development may require network upgrades. Property Council NT supports reasonable, site-related upgrade requirements where they are transparent, proportionate and identified early.

Appendix A appears to delete the existing Clause 6.2.1 requirement that lots be connected to reticulated services. That deletion should be explained. Unless an equivalent and enforceable requirement is secured elsewhere in the NT Planning Scheme, the provision should be retained or replaced with a clear requirement that each new lot is connected, or demonstrably capable of connection, to reticulated services and that any necessary capacity upgrades are identified before determination.

Implementation should include coordinated referral arrangements between Lands Planning, relevant utility and road authorities, and local government. Applicants should be able to obtain early, consistent advice on water, sewerage, electricity, stormwater, waste collection and road capacity. The cost of broader network augmentation should not be imposed on an individual project without a clear nexus, transparent methodology and proportionate allocation.

3.4 Flooding and storm surge

The Property Council supports the principle of avoiding additional dwellings within areas subject to unacceptable flood or storm surge risk. Growth should be directed to safe, well-serviced land and should not increase risk to people, property or emergency response arrangements.

The exhibited material should, however, be made internally consistent. The summary table describes the prohibition as applying to the “affected portion” of a lot, while the FAQ states that a property cannot be subdivided if any part of it is affected. The draft overlay clauses may also be read as applying to the whole parcel of land that is subject to an overlay.

A blanket whole-of-lot prohibition may unnecessarily sterilise substantial areas of safe land where the hazard footprint is limited. The preferred outcome is that no new dwelling, compliant building envelope, critical access route or essential service is located within the hazard-affected area, while allowing subdivision or development on the unaffected portion where a qualified assessment demonstrates safe access, no transfer of risk, appropriate emergency management and compliance with all other controls. If Government intends to retain a whole-of-lot prohibition, the threshold and rationale should be expressly stated and an efficient ordinary approval pathway should be available for demonstrably safe, unaffected land rather than reliance on an Exceptional Development Permit alone.

3.5 Battle-axe lots

Property Council NT supports allowing battle-axe lots in Zone LR. They can retain an existing dwelling, make practical use of deep or constrained sites and preserve the established streetscape by locating an additional dwelling behind the primary frontage.

The current drafting – “battle-axe lots are to be avoided unless” – continues to frame the form negatively and may lead to inconsistent interpretation. Further, the criterion referring only to “site irregularity” is narrower than the explanatory rationale, which also contemplates narrow, deep or otherwise constrained sites that may be regular in shape.

We recommend a positive performance test along the following lines:

“Battle-axe lots may be permitted in Zone LR where conventional frontage subdivision is impracticable because of site dimensions, configuration or existing development, and the proposal demonstrates safe and functional access, servicing, drainage and residential amenity.”

A practice note should also address access-strip design, vehicle turning and passing, emergency and construction access, utility corridors, waste collection, stormwater, landscaping, privacy and the relationship with adjoining driveways. We support the proposal that the 450m² minimum exclude the access strip and that reduced setback provisions not apply to battle-axe lots.

3.6 Amenity, assessment and implementation

The Property Council supports retaining clear amenity protections. Infill will retain community confidence only where development produces functional homes and avoids unreasonable impacts on adjoining residents. Existing controls for height, setbacks, parking, private open space, landscaping, design and articulation should remain clear and consistently applied.

Government should accompany the scheme amendment with a concise implementation package containing:

- deemed-to-comply diagrams for common two-lot subdivisions, duplexes, retained-dwelling sites, battle-axe lots and irregular sites;
- a standard application checklist covering survey, servicing, access, stormwater, waste, parking, open space and landscaping;
- published referral responsibilities and target response times for service authorities;
- consistent guidance on the 10 per cent lot-size and density variations; and
- training and practice guidance for assessors so equivalent proposals receive equivalent treatment across the Territory.

The marked-up amendment also appears to remove the subdivision requirement dealing with potential land-use conflicts and visual and acoustic privacy. If that outcome is not addressed by another provision, it should be retained or replaced. The final amendment should also include clear transitional arrangements for applications already lodged and approvals already granted.

3.7 Monitoring and review

Property Council NT recommends a formal review within 12–24 months of commencement. The review should be evidence-based and should publish, at a minimum:

- the number and location of subdivision, dwelling-group and dwelling-multiple applications, approvals and refusals;
- average assessment and service-authority referral timeframes;
- use of the 10 per cent variation provisions and the reasons for approval or refusal;
- the number of lots and dwellings delivered;
- infrastructure conditions and upgrade costs imposed on projects;
- design, amenity, objection and appeal outcomes; and

- any unintended barriers or geographic gaps in uptake.

The review should be used to refine implementation guidance and to consider a specific 400m² pathway in suitable serviced and unconstrained areas where the initial reforms demonstrate sound design and infrastructure outcomes.

4. Conclusion

Planning Scheme Amendment PA2026/0205 is a practical and overdue step toward greater housing choice in established Northern Territory communities. It substantially reflects the Property Council's previous advocacy and provides a controlled pathway for low-rise infill, smaller freehold lots and better use of existing urban land and infrastructure.

With the targeted refinements outlined in this submission – particularly on servicing, hazard overlays, battle-axe lots, objective guidance and monitoring – the amendment should proceed without delay.

Property Council NT appreciates the constructive engagement undertaken to date and would welcome the opportunity to participate in any Planning Commission hearing or technical implementation workshop.

Yours sincerely

Ruth Palmer

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NT Shelter

Submission to *Proposed Planning Scheme Amendment to facilitate infill redevelopment and subdivision in Zone LR (Low Density Residential)*

August 2026



NT Shelter

NT Shelter is the Northern Territory's peak body for affordable housing and homelessness. We advocate for affordable and appropriate housing for all Territorians, particularly people on low incomes and those experiencing housing disadvantage. Our work includes research and policy development, advocacy, sector consultation and coordination, communications and capacity building.

NT Shelter works with organisations delivering social, affordable, crisis, transitional, short-term and supported housing, as well as services for people experiencing or at risk of homelessness.

NT Shelter membership is as follows:



Executive Summary

NT Shelter welcomes the opportunity to respond to the Northern Territory Planning Commission's (NTPC) explanatory paper on Proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential).

NT Shelter supports the proposed amendments to enable more infill development and subdivision in Zone LR. The package is a practical step towards making better use of serviced land in established communities, increasing housing choice and allowing modest forms of additional density while retaining development assessment and design controls.

Our support is accompanied by a central concern: the reforms contain no explicit objective or pathway for social and affordable housing. Increasing theoretical development capacity will not, by itself, produce homes that people on low and moderate incomes can afford.

Infrastructure capacity and costs must also be addressed strategically. A site-by-site approach under which an individual developer bears upgrades triggered by a particular application does not resolve cumulative network constraints or provide a fair basis for sequencing and sharing the cost of infrastructure that benefits multiple developments and the wider community.

Research from the UNSW City Future Centre revealed that the NT has the highest rate of housing need in Australia at 11% of our population.¹ Moreover, Anglicare's report on Rental Affordability in the NT released in 2024 highlighted a significant shortfall of 10,800 social and affordable homes that are needed today, with projections of this number ballooning to over 14,000 by 2036 if urgent action isn't taken to accelerate social and affordable housing growth.²

Without deliberate action that is inclusive of social and affordable housing, there is a risk that the reforms intended to broaden housing choice in the NT will instead entrench market-rate outcomes and leave low-and moderate-income families behind.

In addition, it is essential that planning includes early and meaningful engagement with local community in order to ensure that any greater density is "density done well".

¹ UNSW City Future Centre, *Unmet Housing Need: Presentation, 2023*

² Anglicare NT, *Rental Affordability in the NT: Snapshot Report 2024*

Recommendations

1. Proceed with the proposed amendments, subject to the refinements and implementation measures outlined in this submission.
2. Include an explicit social and affordable housing objective in the reforms and their implementation, and report on the number and tenure of additional dwellings enabled.
3. Provide greater density discretion for eligible social and affordable housing redevelopment where it renews ageing stock, delivers a demonstrable net increase in social and/or affordable housing, and achieves appropriate design, amenity and infrastructure outcomes.
4. Develop a coordinated infrastructure capacity, sequencing and funding framework with Power and Water Corporation and local government, including fair cost-sharing principles for cumulative upgrades.
5. Strengthen climate-responsive and resilient design expectations for infill housing, including shade, passive cooling, airflow, landscaping, stormwater management, cyclone resilience and reduced lifetime energy costs.
6. Monitor and publicly report approvals, completions, location, dwelling type and tenure arising from the reforms, and review the operation of the changes after 12 months.

NT Shelter's position on each proposed amendment

The following schedule responds explicitly to every change identified in the explanatory document. NT Shelter supports all nine discrete changes listed below. The qualifications are intended to improve housing outcomes and implementation, not to oppose the reform package.

1. Minimum lot size

Proposed change: Reduce the minimum lot size in Zone LR from 800 m² to 450 m².

NT Shelter position: Support

This aligns the established-area minimum with smaller Zone LR lots already used in greenfield areas and can unlock additional housing and subdivision opportunities. Existing requirements for parking, setbacks, open space and a site plan for lots between 450 m² and 600 m² remain important. The change should be monitored to determine whether it produces genuinely diverse and more affordable housing.

2. Lot-size variation

Proposed change: Increase the consent authority's discretion from 5% to 10%, allowing consideration of lots as small as 405 m².

NT Shelter position: Support

Modest discretion can respond to irregular sites, existing dwelling locations and established subdivision patterns. The suitability of each resulting lot for housing, access, private open space, landscaping and servicing should remain central to assessment.

3. Types of homes

Proposed change: Make dwelling-group and dwelling-multiple development merit assessable in Zone LR, rather than prohibited. A development permit and notification would be required.

NT Shelter position: Support

Allowing duplexes, detached or semi-detached dwellings and other small-scale multi-dwelling forms is necessary for housing diversity and gentle density. Merit assessment provides oversight of design, amenity, height, setbacks, site coverage and neighbourhood impacts.

4. Maximum density

Proposed change: Introduce a maximum density of one dwelling per 450 m² of site area for dwelling-group or dwelling-multiple development.

NT Shelter position: Support

This coordinates density with the proposed minimum lot size and allows an equivalent housing outcome where formal subdivision is impractical. However, the general density should not preclude a separate, safeguarded discretion for eligible social and affordable housing renewal.

5. Density variation

Proposed change: Limit discretion above the prescribed maximum density to 10%, allowing consideration of one dwelling per 405 m².

NT Shelter position: Support

A clear variation cap gives applicants and communities greater certainty. For general market development the proposed cap is reasonable. NT Shelter nevertheless recommends an additional pathway for eligible social and affordable housing projects where public benefit, design and servicing requirements are demonstrated.

6. Minimum frontage

Proposed change: Reduce the minimum frontage for lots between 450 m² and 600 m² from 13 metres to 12 metres.

NT Shelter position: Support

The change can improve the feasibility of infill in established suburbs while retaining space for access, servicing and a functional building envelope. Streetscape, safe vehicle access, parking and pedestrian amenity should continue to be assessed.

7. Battle-axe lots

Proposed change: Allow battle-axe lots in limited circumstances where required by site layout or to retain an existing dwelling, with the access strip additional to the minimum lot area.

NT Shelter position: Support

This can unlock constrained sites and enable retention of sound existing housing. The stated safeguards, including normal setbacks and adequate access, are appropriate. Assessment should also consider emergency access, waste collection, drainage, service connections, landscaping and the amenity of both dwellings.

8. Subdivision on flood and storm-surge affected land

Proposed change: Prohibit subdivision on the affected portion of land identified under the flooding and storm-surge overlays, replacing the current direction that subdivision is to be avoided.

NT Shelter position: Support

Avoiding the creation of additional residential lots on land exposed to known hazards is prudent, particularly as extreme weather risks grow. The restriction should be supported by current hazard

mapping and transparent advice. Any exceptional pathway should apply rigorous risk, evacuation, resilience and emergency-management tests.

9. Dwelling-group and dwelling-multiple development on flood and storm-surge affected land

Proposed change: Prohibit dwelling-group and dwelling-multiple development on the affected portion of land identified under the flooding and storm-surge overlays, rather than allowing development above the applicable flood level.

NT Shelter position: Support

NT Shelter supports avoiding a greater concentration of residents in known hazard areas. Assessment and mapping should take account of future climate risk, not only historical events. The continuing availability of an exceptional pathway should not undermine the precautionary purpose of the prohibition.

Why further social and affordable housing measures are needed

The reforms should have an explicit affordability purpose.

NT Shelter welcomes the Government's recognition that infill can respond to housing challenges, broaden housing choice and make more efficient use of serviced land. However, the proposal does not specify how the additional development capacity will contribute to social or affordable housing.

Market capacity and housing affordability are not the same outcome. Infill can involve substantial demolition, design, approval, servicing and construction costs. New dwellings may therefore be sold or rented at market rates beyond the reach of households in greatest housing need. Older lower-cost dwellings can also be lost through redevelopment. The planning framework should recognise social and affordable housing as an intended public benefit and implementation should measure whether that benefit is achieved.

Where public housing stock is assessed as beyond economic repair, redevelopment is often constrained to a like-for-like replacement model due to inflexible planning controls. While this approach may satisfy minimum asset standards, it does little to address long public housing waitlists, overcrowding or the lack of housing diversity in well-located urban areas. Replacing one outdated dwelling with one new dwelling on the same site may meet asset standards, but it fails to meet housing need.

In March 2025, only five NT rentals were considered affordable for a hospitality worker.³ This is not only unjust, but also economically and socially unsustainable. When essentials workers are priced out of living near the communities they serve, recruitment and retention stifles, and workforce stability across schools, hospitals, aged care facilities, and emergency services are undermined.⁴

The consensus among various national and international researchers and economists is that to fix a housing crisis, social and affordable housing stock must be increased. Market-rate housing delivery alone cannot meet the current needs of the NT's population, including Territorians experiencing homelessness which sits at 12 times the national rate.⁵

³ Anglicare Australia, *Rental Affordability Snapshot Essential Workers Report, 2025*

⁴ Hope Housing, *Tracking the housing situation, commuting patterns and affordability challenges of essential workers, 2023*

⁵ Department of Children and Families, *NT Homelessness Strategy 2025-2023, 2025*

Renewing ageing public and community housing

The reform is particularly relevant to ageing public and community housing in established urban areas. Where a dwelling is at or approaching the end of its economic life, like-for-like replacement may be poor value and may miss an opportunity to increase housing supply. Yet a Zone LR site below 900 m² would ordinarily remain unable to accommodate two dwellings under the proposed one-per-450 m² density. With the proposed 10% variation, a site of approximately 810 m² may potentially accommodate two dwellings, but smaller or constrained sites would remain excluded or dependent on another planning pathway.

NT Shelter recommends greater density discretion for eligible social and affordable housing projects. Eligibility should require:

- renewal of ageing or no-longer-fit-for-purpose housing;
- a demonstrable net increase in social and/or affordable housing across the project or an approved portfolio-level program;
- appropriate site and building design, including amenity for residents and neighbours;
- long-term retention of the additional social or affordable housing;
- acceptable access, parking, stormwater and infrastructure outcomes; and
- transparent assessment against published criteria.

Good design, neighbourhood amenity and Territory conditions

NT Shelter recognises the importance of development responding appropriately to its surrounding area. Neighbourhood character should not, however, be interpreted as requiring the retention or replication of ageing, low-density dwelling forms where well-designed redevelopment can improve housing quality and provide additional homes. The focus should be on good design, amenity and compatibility, rather than preserving existing dwelling form alone.

The Minister's report and proposed provisions recognise matters including urban heat, flooding, runoff, shade, prevailing breezes and access to sunlight. NT Shelter considers that these recognised risks should translate more clearly into climate-responsive and resilient infill outcomes suited to the Territory. This includes:

- orientation and design that support prevailing breezes and passive cooling;
- deep shade, appropriate eaves and usable shaded outdoor space;
- tree retention and landscaping that reduce heat and support privacy;
- stormwater management that does not transfer impacts to adjoining sites or public infrastructure;
- cyclone resilience and safe storage of outdoor items;
- energy and water efficiency that reduce lifetime costs for low-income residents; and
- universal and adaptable design wherever practicable.

Infrastructure capacity, sequencing and fair cost sharing

The explanatory document states that increased development intensity may require upgrades to existing infrastructure and that necessary works are to be borne by the developer. NT Shelter accepts that a development should meet reasonable site-specific servicing requirements. However, this approach does not resolve how cumulative constraints are identified, how upgrades benefiting multiple sites are sequenced, or how costs are shared fairly.

NT Shelter supports LGANT's call for NT Government to have meaningful engagement with local government on infrastructure needs, future maintenance costs, funding and delivery. Power and Water Corporation should also be central to this work. The implementation framework should include:

- published or accessible information about network capacity and known constraints;
- area-based infrastructure assessments for locations with significant infill potential;
- clear and proportionate developer contribution and cost-sharing principles;
- a mechanism to apportion or recover the cost of shared upgrades across later beneficiaries;
- coordination of infrastructure investment with the sequencing of infill development; and
- specific consideration of the viability constraints faced by social and affordable housing projects.

Implementation, monitoring and review

The maps of Zone LR lots greater than 900 m² provide useful context but do not establish that each identified property can be developed. Configuration, access, overlays, servicing, existing buildings and other site constraints remain relevant. Conversely, some smaller sites may be suitable through variation, rezoning or an alternative development form.

Implementation should therefore be supported by transparent monitoring. NT Shelter recommends public reporting on:

- applications, approvals and completions enabled by the amendments;
- the location and dwelling form of additional housing;
- the tenure of additional housing, including social and affordable dwellings;
- use and outcomes of lot-size and density variations;
- infrastructure upgrades required and their effect on feasibility;
- loss of existing lower-cost, public or community housing; and
- reasons suitable proposals are refused, withdrawn or do not proceed.

The amendments should be formally reviewed after 12 months, with input from local government, community housing providers, residents, infrastructure agencies, planners and the development sector.



Annie Taylor
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NT Shelter
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Submission to NT Planning Commission:

Proposed Planning Scheme Amendment to
facilitate infill development and subdivision in
Zone LR (Low Density Residential)

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Introduction

The Local Government Association of the Northern Territory (LGANT) welcomes the opportunity to provide a submission to the Northern Territory Planning Commission's (NTPC) Proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential).

As the peak body representing all local government across the Northern Territory, LGANT provides leadership, support, representation and advocacy on behalf of our member councils for the benefit of their communities. LGANT's membership comprises five municipal councils, ten regional councils, three shire councils and one associate member.

Local government councils are the sphere of government closest to the community, and they know their community's priorities. They are a significant stakeholder in land planning as, following development, councils typically inherit responsibility for public assets such as roads, storm water drainage, street lighting and signage, parks, community facilities etc. These assets require on-going servicing, maintenance and eventual renewal, which can place a considerable burden on councils, many of which operate with limited resources.

To avoid cost-shifting and ensure developments are well-designed, serviceable and sustainable, early and meaningful engagement with local government is essential. The Northern Territory Government's (NTG) planning authority often overlaps with local government responsibilities, and given local government's knowledge of local infrastructure capacity, it would be beneficial to engage with councils prior to any development of the identified LR sites. This helps safeguard long-term liveability and community outcomes and ensures that infrastructure can be adequately supported over its lifecycle.

While the proposed amendment includes measures such as minimum car-parking requirements and building height limits, increased residential density can also give rise to broader liveability and service delivery considerations. These include potential increases in neighbourhood noise, more traffic, greater demand on local amenity and animal management services associated with higher pet ownership rates, and the cumulative impacts of intensified development on established residential areas.

Summary of recommendations

1. Local government consultation and engagement

LGANT recommends that meaningful engagement with local government be embedded within the infill development framework, recognising councils as key partners with unique knowledge of local communities, growth pressures and planning priorities.

2. Infrastructure audits

LGANT recommends that the NTG undertake and fund infrastructure capacity assessments prior to rezoning or development approval to ensure that infill development does not result in unplanned cost shifting or infrastructure burdens for local government.

3. Infrastructure upgrades

LGANT recommends that no infill development proceed where upgrades to council-owned infrastructure are required unless the relevant council has been consulted and has agreed to the scope, design, construction standards, asset handover arrangements and ongoing maintenance responsibilities.

4. Infrastructure maintenance

LGANT recommends that the NTG establish mechanisms to ensure infill development does not result in cost shifting to local government, including arrangements to fund any increased

infrastructure maintenance, renewal and replacement costs arising from higher-density development.

5. Strategic planning and cumulative impacts

LGANT recommends that the NTG undertake strategic suburb-level assessments of infrastructure capacity, transport networks, traffic impacts and community infrastructure before enabling widespread infill development, rather than relying solely on site-by-site development assessments.

Feedback

LGANT broadly supports the NTG's focus on infill development that promotes housing diversity, improves the efficient use of existing infrastructure and supports sustainable urban growth. However, LGANT also recognises that a one-size-fits-all approach may not be appropriate across the Territory. Community expectations and local planning objectives vary significantly between municipalities and regional areas. LGANT therefore considers that local circumstances and community aspirations should be carefully considered when determining the suitability and application of infill development provisions.

While LGANT supports the intent of the proposed reforms to increase housing diversity, we consider that the proposal places significant reliance on individual development assessments without first establishing a comprehensive understanding of the cumulative impacts that increased density may have on infrastructure, transport networks, traffic flow and local government services.

The supporting documentation primarily identifies lot size, configuration and flood or storm surge constraints as key determinants of suitability. However, successful infill development requires consideration of a much broader range of factors, including infrastructure capacity, transport corridors, service provision, lifecycle asset cost, planning for schools and shopping centres and long-term planning outcomes. LGANT therefore recommends a more strategic and collaborative approach to implementation, including upfront infrastructure assessments, stronger local government involvement in infrastructure planning and approvals, and measures to ensure that increased development does not result in unintended cost shifting to councils and ratepayers.

Local Government Consultation and Engagement

Local government plays a critical role in the planning and delivery of sustainable communities and should be meaningfully involved in the implementation of any infill development policy. Councils are the level of government closest to their communities and have a detailed understanding of local priorities, community expectations, growth and place-based challenges. They are also responsible for the on-going management and maintenance of a significant proportion of the infrastructure and public assets that support residential development, including local roads, drainage systems, parks, footpaths, bike paths and community facilities. Despite local government being responsible for significant community infrastructure and playing an important role in managing growth at a local level, the explanatory document contains limited discussion of the role of councils in the planning, assessment and implementation of infill development.

Early and meaningful engagement with local government will help ensure that infill development is appropriately located, supported by adequate infrastructure and aligned with the needs and aspirations of the communities it is intended to serve. LGANT considers that councils should be recognised as partners in the planning and delivery of infill development.

1. LGANT recommends that meaningful engagement with local government be embedded within the infill development framework, recognising councils as key partners with unique knowledge of local communities, growth pressures and planning priorities.

Infrastructure audits

LGANT notes that the proposed amendment does not include a requirement for infrastructure capacity audits to be undertaken prior to identifying areas suitable for infill development. While the explanatory material acknowledges that infrastructure capacity may constrain development and that some sites may require upgrades, the indicative mapping appears to be based primarily on lot size and the exclusion of land effected by flooding and storm surge. It is unclear how broader impacts of population growth have been considered in identifying infill areas.

The current approach relies on matters such as traffic flow and transport corridors etc. being considered through individual development applications, however, this may not adequately capture the cumulative impacts of increased density across an entire suburb or locality. For example, a single additional dwelling may have minimal impact in isolation, but the gradual approval of numerous developments within the same area could result in significant population growth and increased pressure on local infrastructure and services. Studies would also need to be conducted on speed limits and restrictions, as denser suburbs and roads may require speed restriction reviews.

LGANT considers that strategic, suburb-level infrastructure audits should be undertaken and funded by the NTG prior to implementation of the proposed reforms. These audits should assess the capacity of existing infrastructure and services to accommodate future growth, identify areas where infill development can be sustainably supported, and determine where upgrades or investment may be required before additional density is enabled. This would provide a more comprehensive evidence base for decision-making and ensure that the suitability of infill locations is determined by a broader range of factors than lot size and flood or storm surge constraints alone.

2. LGANT recommends that the NTG undertake and fund infrastructure capacity assessments prior to rezoning or development approval to ensure that infill development does not result in unplanned cost shifting or infrastructure burdens for local government.

Infrastructure upgrades

The explanatory document notes that increased development intensity may require upgrades to existing infrastructure and that the cost of any necessary works would be borne by the developer. However, it does not explain how upgrades to council-owned infrastructure would be managed, nor does it outline the role of local government in determining whether such upgrades are appropriate or acceptable.

Many of the assets that may be affected by increased residential density, such as local roads, drainage systems, footpaths, public open space and associated infrastructure, are owned, managed and maintained by local government. While a developer may fund upgrades to accommodate a particular development, councils ultimately inherit responsibility for these assets and their ongoing operation. As such, councils should have a clear role in determining the scope of works, design standards, construction requirements, asset handover arrangements and future maintenance obligations.

LGANT is concerned that the current proposal does not provide clarity on how councils will be consulted where upgrades to council-owned infrastructure are required, or how potential disputes regarding infrastructure design, capacity requirements, future liabilities or asset ownership would be resolved. Without a formal mechanism for council involvement, there is a risk that infrastructure could be upgraded in a manner that does not align with council standards, strategic planning objectives or long-term asset management requirements.

Given councils' responsibility for the long-term management of these assets, LGANT considers that local governments should be recognised as key stakeholders in any decision involving upgrades to

council-owned infrastructure. Early consultation and formal agreement with the relevant council should be required before development proceeds, ensuring that infrastructure upgrades are fit for purpose, appropriately designed and supported by clear arrangements regarding ownership, maintenance and future renewal responsibilities.

3. LGANT recommends that no infill development proceed where upgrades to council-owned infrastructure are required unless the relevant council has been consulted and has agreed to the scope, design, construction standards, asset handover arrangements and ongoing maintenance responsibilities.

Infrastructure maintenance

While the explanatory document states that developers will be responsible for the cost of any infrastructure upgrades required to support development, it does not address the ongoing maintenance, repair, renewal and replacement costs associated with those assets once they are handed over. The initial construction cost represents only a portion of the total lifecycle cost of infrastructure, with councils often responsible for maintaining assets over many decades.

Higher-density development may increase the frequency and cost of infrastructure maintenance, particularly where additional demand is placed on local roads, drainage systems, public open space and other council-managed assets. The proposal does not outline how these ongoing costs will be assessed or funded, creating a risk that councils and ratepayers may inherit additional financial liabilities as a result of growth. LGANT considers that mechanisms should be established to identify, quantify and appropriately fund any increased lifecycle costs arising from infill development to ensure that growth does not result in unintended cost shifting to local government.

4. LGANT recommends that the NTG establish mechanisms to ensure infill development does not result in cost shifting to local government, including arrangements to fund any increased infrastructure maintenance, renewal and replacement costs arising from higher-density development.

Strategic planning and cumulative impacts

The proposed amendment appears to rely largely on site-by-site development assessment to determine whether individual infill proposals are appropriate. However, many of the impacts associated with infill development are not experienced at the individual lot level, but across a suburb, precinct or broader community. While a single additional dwelling may have a negligible impact on local infrastructure, the cumulative effect of many developments occurring within the same locality over time may place significant pressure on transport networks, traffic movements, drainage systems, community facilities, public open space and other essential services. The explanatory document identifies lots based primarily on size and flood or storm surge constraints and acknowledges that the mapping is indicative only and does not consider factors such as infrastructure capacity and other site-specific constraints.

LGANT notes that the NT Subdivision Development Guidelines have been adopted across most local government areas in the Territory and reflect a shared expectation that infrastructure capacity, asset management and servicing requirements be considered as part of development planning.

LGANT considers that a strategic assessment of likely growth scenarios should be undertaken before widespread infill development is enabled. Suburb-level planning would provide a more comprehensive understanding of how increased density may affect a neighbourhood as a whole, identify infrastructure and service requirements in advance, and help determine where infill development can be sustainably accommodated. Without this broader assessment, there is a risk that individually acceptable developments may collectively result in infrastructure constraints, loss

of amenity and unplanned costs for government and the community. A strategic approach would provide greater certainty for residents, councils, developers and government while ensuring that growth occurs in locations that are capable of supporting it over the long term.

5. LGANT recommends that the NTG undertake strategic suburb-level assessments of infrastructure capacity, transport networks, traffic impacts and community infrastructure before enabling widespread infill development, rather than relying solely on site-by-site development assessments.

Conclusion

LGANT appreciates the opportunity to contribute to the proposed Planning Scheme Amendment and welcomes the NTG's focus on infill development as a means of increasing housing diversity. LGANT supports the development of an infill policy and recognises the important role infill development can play in addressing housing challenges across the Territory. However, it is important that infill development is supported by appropriate strategic planning, infrastructure assessment and meaningful engagement with local government to ensure growth is sustainable and does not create unintended financial, infrastructure or service delivery impacts for councils and their communities.

LGANT looks forward to continuing to work collaboratively with the NTG, the NT Planning Commission and other stakeholders as this work progresses. We welcome further opportunities to provide information, clarification and local government perspectives to support the development of an infill framework that delivers positive housing outcomes while maintaining community amenity, protecting council assets and ensuring long-term sustainability for Territory communities.

21 August 2026

Northern Territory Planning Commission
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Re: Proposed amendments to the Northern Territory Planning Scheme 2020 - infill development and subdivision in Zone LR

Dear Northern Territory Planning Commission,

Engineers Australia welcomes the opportunity to comment on the proposed amendments to the Northern Territory Planning Scheme 2020 (NTPS) relating to infill development and subdivision in Zone LR (Low Density Residential). This submission builds on Engineers Australia's response to the Northern Territory Planning Commission's initial consultation dated 17 December 2025.

Engineers Australia supports the strategic intent of enabling appropriately located, small-scale infill development. The proposed reforms have the potential to increase housing choice, improve utilisation of existing urban land and support more compact settlement patterns. We also acknowledge the proposed retention of merit assessment and public notification for dwelling-group and dwelling-multiple development, and the proposed prohibitions applying to affected land in the flood and storm surge overlays.

Our support is conditional. The reform should be accompanied by a proportionate and transparent implementation framework that protects infrastructure performance, provides early servicing certainty to small proponents and preserves tropical liveability. The current package addresses several planning and hazard matters, but does not yet demonstrate how cumulative infrastructure constraints, small-development feasibility, stormwater impacts and tropical built-form outcomes will be managed as uptake occurs.

Engineers Australia position

Support the proposed amendments in principle, subject to an accompanying implementation package for infrastructure capacity, proportionate small-scale assessment, tropical design and post-implementation monitoring.

Recommendations

1. Publish place-based infrastructure servicing plans or capacity information for the urban areas affected by the reform, covering at least water, wastewater, stormwater, electricity and transport constraints.
2. Retain mandatory pre-feasibility servicing assessment, but introduce a proportionate pathway for single-lot, two-lot and small multi-dwelling proposals, with clear minimum information requirements and early referral advice.
3. Identify known network constraints, likely augmentation triggers, responsibility for upgrades and any applicable contribution mechanism before proponents incur substantial design and application costs.

4. Apply an equivalent infrastructure-assurance pathway to dwelling-group and dwelling-multiple development where the land is not subdivided, so that servicing outcomes do not depend on the chosen tenure or approval pathway.
5. Strengthen or review planning controls and guidance for tropical built form, including orientation, breeze access, building separation, shade, canopy, permeability, site coverage and heat-responsive materials.
6. Establish cumulative-impact monitoring and defined review triggers for drainage, service networks, street function, parking, canopy and urban heat following commencement of the amendment.
7. Publish plain-language guidance, model layouts and a coordinated pre-lodgement pathway for small proponents, including battle-axe access, waste collection, emergency access and service connection expectations.

1. Background and scope

The exhibited amendment would reduce the minimum lot size in Zone LR to 450 m², allow dwelling-group and dwelling-multiple development at a density of one dwelling per 450 m², permit limited battle-axe configurations, reduce the minimum frontage for certain smaller lots and cap density variation at 10%. The amendment would also prevent the creation of new lots and dwelling-group or dwelling-multiple development on Zone LR land affected by the flooding and storm surge overlays.

The explanatory material states that all subdivision, dwelling-group and dwelling-multiple proposals would continue to require a development application, assessment against the NTPS and public notification. It also notes that indicative mapping does not account for site-specific infrastructure capacity, access or configuration constraints.

The Northern Territory Subdivision Development Guidelines (NTSDG) apply to subdivisions and establish technical standards for public infrastructure and development permit clearance. They require engagement with relevant authorities and allow project-specific requirements to be agreed. However, their structure and many documentation requirements are principally suited to conventional multi-lot subdivision and public-infrastructure handover. Applying the full framework without proportionality to a single existing lot divided into two can impose investigation and documentation costs that are out of scale with the development.

Engineers Australia's assessment of the extent to which issues raised in its December 2025 submission have been addressed by the exhibited package is provided in Appendix A. This assessment informs the recommendations in this submission and highlights areas where further implementation measures are required.

Central implementation issue

The reform creates a broad planning opportunity. Infrastructure information must be available early enough to show where that opportunity is realistically serviceable and what downstream upgrades may be required.

2. Matters addressed by the exhibited amendment

2.1 Strategic intent, density and assessment

The amendment responds to the objective of increasing housing diversity within existing urban areas. A minimum 450 m² lot and a density of one dwelling per 450 m² provide a relatively clear development envelope, while merit assessment, public notification and the proposed 10% limit on density variation retain consent-authority oversight.

2.2 Flood and storm surge exposure

The proposed prohibitions for new lots and dwelling-group or dwelling-multiple development on Zone LR land affected by the flooding and storm surge overlays are a substantive response to hazard exposure. Engineers Australia supports this precautionary approach.

2.3 Existing built-form controls

The amendment retains existing controls for building height, setbacks, private open space, residential building design, articulation, landscaping and parking. Retention is positive, but it does not by itself establish that those controls will continue to deliver suitable tropical outcomes when lot size, dwelling yield, crossovers and hardstand increase.

3. Infrastructure capacity and development certainty

3.1 Retain the feasibility assessment

Engineers Australia supports retaining an early infrastructure feasibility assessment. A planning entitlement should not be interpreted as confirmation that a particular site can be serviced without augmentation. Water pressure and fire flow, wastewater capacity and grades, local drainage, electricity supply, access and street function remain site- and catchment-specific.

3.2 Make the assessment proportionate

The assessment pathway should distinguish between large subdivisions that create public roads and networks, and small infill proposals that add one lot or a small number of dwellings. The objective should be the same level of infrastructure assurance, not the same volume of documentation. Relevant authorities should be able to waive non-applicable NTSDG requirements and provide a concise, coordinated scope at pre-lodgement stage.

3.3 Publish infrastructure servicing plans

A small proponent cannot reasonably model an entire downstream network to discover whether one additional lot is feasible. Government and network owners are best placed to maintain catchment- and network-level information. Engineers Australia therefore recommends place-based servicing plans or published capacity information that identifies:

- areas with no presently known material servicing constraint for the intended scale of infill;
- areas where targeted investigation or authority confirmation is required;
- known constrained catchments, assets or intersections;
- the nature and approximate threshold of likely augmentation;
- which party is responsible for assessment, design and funding; and
- how cumulative demand and committed development are reflected in capacity advice.

The published information need not disclose security-sensitive asset details or guarantee development approval. It should provide a reliable screening layer that allows landowners, consultants, developers, consent authorities and the community to understand the likely servicing pathway before substantial expenditure.

3.4 Avoid the last-in proponent problem

Where cumulative small developments consume residual capacity, the final applicant may be asked to fund an upgrade that benefits a wider catchment. The implementation framework should define augmentation triggers and fair contribution or reimbursement arrangements. Without this, the reform risks uncertain project feasibility, inequitable costs and delayed infrastructure investment.

3.5 Apply equivalent assurance to non-subdivision pathways

The amendment also allows additional dwellings through dwelling-group and dwelling-multiple development without creating a new lot. These proposals can impose comparable infrastructure demand but may not trigger the full subdivision framework. Infrastructure assessment and authority referral should therefore be based on additional demand and risk, not solely on whether cadastral subdivision occurs.

4. Stormwater, permeability and cumulative drainage

Smaller lots and additional dwellings are likely to increase roofs, driveways, crossovers and other impervious surfaces. Excluding land affected by flood and storm surge overlays reduces exposure to mapped hazards but does not address increased runoff generated within otherwise developable urban catchments.

The NTSDG contains standards for subdivision drainage and public infrastructure. For small infill, the implementation challenge is to identify a practical requirement that protects downstream systems without requiring every two-lot proponent to undertake catchment-scale analysis.

Engineers Australia recommends a tiered approach:

- a simple deemed-to-comply pathway where impervious area, lawful discharge and site conditions remain within defined limits;
- site-specific stormwater management, including detention or infiltration where those limits are exceeded or a known local constraint exists;
- authority-led catchment assessments and drainage plans for areas experiencing concentrated uptake; and
- monitoring triggers linked to development approvals, complaints, nuisance flooding and network performance.

The planning framework should at minimum preserve sufficient permeable and landscaped area and ensure that each development has a lawful, maintainable discharge strategy. Detailed hydraulic standards can sit in guidance or authority requirements, but the expected performance outcome and assessment trigger should be unambiguous.

5. Tropical built form and liveability

5.1 Why this remains a planning issue

Unlike trunk infrastructure capacity, orientation, setbacks, site coverage, landscaping and the relationship between adjoining buildings are directly influenced by the NTPS. Tropical performance should therefore not be treated solely as a building-code or post-approval matter.

A 450 m² lot is not inherently incompatible with good tropical design. The concern is whether the combined controls reliably produce shade, ventilation, usable outdoor space, canopy and manageable heat loads at the proposed intensity. The exhibited documents rely mainly on retention of existing controls and do not demonstrate, through built-form testing in the consultation materials, that those controls are sufficient for the new development pattern.

5.2 Breeze access and orientation

The proposed subdivision clause retains an outcome that lots be oriented to take advantage of environmental conditions such as prevailing breezes and sunlight. Engineers Australia supports that outcome but recommends clearer guidance for its application to constrained infill sites. Assessment should consider building separation, side setbacks, alignment of private open space, avoidance of continuous built form and the combined effect of development on adjoining properties.

5.3 Shade, canopy, permeability and site coverage

Landscaping and private open-space controls should be reviewed together with parking, access and building footprints. A nominal landscaped area may not provide meaningful shade or mature canopy if fragmented by services, crossovers and narrow setbacks. The framework should include measurable outcomes for deep-soil planting, canopy at maturity, shaded outdoor areas and permeable surfaces, calibrated to lot size and housing type.

5.4 Heat and energy demand

Increased hardstand and reduced vegetation can raise local heat exposure and cooling demand. Planning controls and supporting guidance should encourage shaded or higher-reflectance external surfaces, deep eaves and weather protection, ventilated roof spaces, solar-responsive orientation and practical provision for ceiling fans and photovoltaic systems. Requirements should focus on performance and avoid prescribing a single architectural response.

5.5 Recommended implementation

Before or alongside commencement, Government should test representative 450 m² subdivisions, duplexes, battle-axe layouts and small dwelling-group schemes against dry-season and wet-season tropical design objectives. The results should inform amendments to the NTPS, a referenced design guideline or a practice note. Model layouts would help small proponents understand how to achieve compliant outcomes without unnecessary redesign.

6. Access, parking, waste and battle-axe lots

Engineers Australia supports restricting battle-axe lots to circumstances where site configuration requires them or they enable retention of an existing dwelling. Further implementation guidance is still needed for driveway width and grade, passing and turning, drainage, emergency access, utility corridors, bin storage and kerbside collection. Guidance should be proportionate and developed with local government, emergency services and service authorities.

The reduced 12 m frontage may be workable, but cumulative crossover density can reduce kerbside parking, street trees and pedestrian continuity. Local monitoring should identify streets or precincts where consolidated access, parking assessment or additional controls are warranted.

7. Governance, monitoring and review

The amendment should be accompanied by a transparent governance framework rather than relying only on case-by-case development conditions. Engineers Australia recommends:

- a single cross-agency implementation protocol covering planning, local government, roads, Power and Water, drainage and emergency access;
- published service-response timeframes and standard pre-lodgement information for small infill proposals;
- a register or spatial dashboard of approvals and committed additional dwellings for network planning;
- regular review of infrastructure capacity, drainage performance, canopy, urban heat, street parking and community impacts; and
- a formal review of the amendment and supporting controls after sufficient approval and construction data are available, with earlier intervention where defined thresholds are reached.

The implementation commitments sought by Engineers Australia to support these governance and monitoring arrangements are set out in Appendix B.

Recommended decision

Proceed with the amendment only as part of a coordinated implementation package that provides early servicing certainty, proportionate assessment and enforceable tropical-performance outcomes.

Conclusion

Engineers Australia supports enabling well-designed infill in Zone LR. The proposed amendment improves housing choice and responds positively to flood and storm surge risk, while retaining development assessment and public notification. However, a planning opportunity is not a serviceability guarantee. For the reform to achieve its objective, small proponents and the community need early, credible information about infrastructure constraints, likely downstream augmentation and development responsibilities.

The detailed technical standards need not all sit within the NTPS. The planning reform should nevertheless be conditional on a coordinated implementation framework that links the NTPS, the NTSDG, service-authority requirements, infrastructure plans and tropical-design guidance. This framework should be proportionate to small development, transparent before major expenditure and responsive to cumulative impacts.

Engineers Australia's assessment of matters raised during the previous consultation is provided in Appendix A, and the key implementation commitments sought from Government are set out in Appendix B.

Engineers Australia would welcome continued engagement with the Northern Territory Government, local authorities, service authorities and industry to develop a practical framework that supports housing delivery without compromising infrastructure reliability, tropical liveability or community confidence. Please do not hesitate to contact Jenny Jan on jjan@engineersaustralia.org.au or 0438 799 433 as the designated representative for Engineers Australia Northern Division.

Yours sincerely,



Simon Flowers
President Northern Division
Engineers Australia



Russell Burns
Deputy President Northern Division
Engineers Australia



Jenny Jan
General Manager NT
Engineers Australia

References

- Engineers Australia, Consultation Infill Development and Subdivision across the Territory, 17 December 2025.
- Northern Territory Government, Appendix A: Proposed Planning Scheme Amendment - Infill Development and Subdivision in Zone LR, exhibited July-August 2026.
- Northern Territory Government, Explanatory Document and FAQ - Infill Development and Subdivision in Zone LR, exhibited July-August 2026.
- Northern Territory Government, Northern Territory Subdivision Development Guidelines, Part 1, version 2.3, May 2025.
- Northern Territory Planning Commission, Report - Review to Identify Opportunities for Infill Development and Subdivision in Zone LR, 15 March 2026.

Appendix A - Response to matters raised by Engineers Australia in December 2025

The following matrix assesses the exhibited package and the NTSDG against the principal matters raised in Engineers Australia's initial submission. 'Partly addressed' means that an existing control or process is relevant, but a material implementation, evidence or proportionality gap remains.

Issue raised in 2025	Assessment	Position in this submission
Suburb-level capacity mapping and upgrade triggers	Not addressed	Publish infrastructure servicing plans/capacity information and define augmentation triggers, responsibilities and contribution arrangements.
Pre-lodgement servicing checks	Partly addressed	Retain feasibility checks, provide coordinated early authority advice and scale requirements to single-lot and small infill proposals.
Water, fire flow, sewer and electrical capacity	Partly addressed	Service-authority requirements apply, but early network-level constraint information and cumulative planning are required.
Stormwater, permeability and WSUD	Partly addressed	NTSDG drainage requirements assist subdivision proposals; introduce a proportionate small-infill pathway and catchment monitoring.
Flood and storm surge exposure	Addressed	Support the proposed prohibitions for affected Zone LR land.
Breeze pathways, orientation and setbacks	Partly addressed	Existing outcomes refer to environmental conditions; test representative built forms and strengthen measurable tropical-performance guidance.
Site coverage, canopy and heat mitigation	Not addressed	Review controls for deep soil, permeability, canopy, shade, hardstand and heat-responsive materials.
Energy demand and passive cooling	Partly addressed	Coordinate planning guidance with building requirements and network planning; focus on passive design and peak-demand impacts.
Access, parking and street function	Partly addressed	Retained controls and merit assessment assist; monitor cumulative crossovers, kerbside parking, pedestrian continuity and traffic effects.
Battle-axe access, waste and emergency servicing	Partly addressed	Planning circumstances are narrowed, but practical model layouts and authority-agreed servicing standards remain necessary.
Cumulative impact monitoring	Not addressed	Establish data collection, thresholds and a formal post-implementation review mechanism.



Appendix B - Proposed commitments sought from Government

Stage	Commitment sought
Before commencement	Publish an implementation statement identifying the responsible agencies, assessment pathways, applicable guidance and how infrastructure capacity will be checked for subdivision and non-subdivision proposals.
Before substantial uptake	Release infrastructure servicing plans or screening information for affected urban areas, with known constraints and escalation pathways.
At commencement	Introduce a proportionate pre-feasibility checklist and coordinated pre-lodgement service for single-lot and small-scale proposals.
At commencement	Issue tropical infill design guidance and model layouts or commit to a time-bound review of relevant NTPS controls informed by built-form testing.
During implementation	Monitor approvals and cumulative effects on networks, drainage, parking, street trees, canopy and heat.
Post-implementation	Undertake a formal evidence-based review and amend planning controls, infrastructure programs or assessment triggers where performance is not meeting stated objectives.



From: [Jayde Manning](#) on behalf of [Secretariat AAPA](#)
To: [Planning NTG](#)
Subject: FW: "PA2026/0205 Infill development and subdivision" - New Application Submitted
Date: Tuesday, 18 August 2026 4:19:03 PM
Attachments: [image001.png](#)
[Appendix A - Proposed amendments to NTPS 2020.pdf](#)
[image002.png](#)

Good Afternoon,

AAPA has reviewed the proposed Planning Scheme Amendment PA2026/0205 and determined that the amendment relates to residential development and subdivision controls within Zone LR and does not appear to raise matters relevant to the Authority's functions under the Northern Territory Aboriginal Sacred Sites Act. Accordingly, no submission will be made.

Kind regards
Jayde

Jayde Manning
Ministerial and Policy Officer | Policy and Governance
Aboriginal Areas Protection Authority
Telephone: 08 8999 4303
Website: www.aapant.org.au

RCG Centre, Level 4
47 Mitchell Street Darwin | GPO Box 1890, DARWIN NT 0801

Work Hours: 9-day fortnight and am unavailable every second Friday.

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From: Planning NTG <Planning.NTG@nt.gov.au>
Sent: Monday, 27 July 2026 9:08 AM
To: Planning NTG <Planning.NTG@nt.gov.au>
Subject: 'PA2026/0205 Infill development and subdivision' - New Application Submitted

Good morning,

A proposed planning scheme amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR Territory-wide is to be subject to a 28 day public exhibition period, commencing 24/07/2026 and closing on 21/08/2026.

This application can be viewed and comments can be made through ILIS or [Development Applications Online](#) until 21/08/2026.

If you have any enquiries, please feel free to contact Lands Planning Darwin, 8999 8963.

Kind Regards,

Planning NTG
Lands Planning
Department of Lands Planning and Environment

Floor 1, Energy House, 18 – 20 Cavenagh Street, Darwin
GPO Box 1680, Darwin, NT 0801

t. 08 8999 1300



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The NT Government acknowledges the Aboriginal people and cultures of the land and country on which we work and live. We acknowledge the ongoing connection to culture, land, sea and community and pay our respects to Elders past and present and to emerging leaders.

OFFICIAL

CASA has reviewed the documents as provided and advises that an increase in density in the areas proposed, (noting dwellings will be limited to two story) will not create a hazard to aircraft operations.

CASA has no objection to the planning scheme amendments as proposed.



Matthew Windebank
Senior Aerodrome Specialist | Geospatial Assessment
Air Navigation, Airspace & Aerodromes Branch
CASA Air Navigation, Transformation and Risk Division

p: 131 757

e: matthew.windebank@casa.gov.au



20 August 2026

Development Assessment Services

Department of Lands, Planning and Environment
GPO Box 1680
Darwin NT 0801
das.ntg@nt.gov.au

Submission uploaded direct to NT Government ILIS

Dear Development Assessment Services,

RE: PA2026/0205 Proposed NT Planning Scheme 2020 amendment – Infill residential development and subdivision

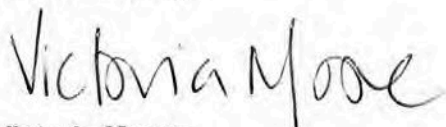
Thank you for your email of 27 July 2026, with reference to online exhibition material and the opportunity for Airport Development Group (ADG) to provide comment.

ADG understands that the proposed amendment is intended to provide greater flexibility in low-density residential areas in response to current housing challenges, while preserving the intent and character of the zone.

ADG requests that the *Land in Proximity to Airports* overlay be added to the exclusion criteria for the proposed amendment (alongside the *Land Subject to Flooding* and *Land Subject to Storm Surge* overlays). This will ensure any low-density residential lots that lie within the endorsed ANEF contours cannot be subdivided or developed for 'dwelling-group' or 'dwelling-multiple' purposes, preventing increased residential density in areas known to be affected by aircraft noise.

Should you have any queries regarding ADG's comments, feel free to contact me at planning@adgnt.com.au.

Yours sincerely,



Victoria Moore
Regulatory & Planning Manager

Ellen Shannon

From: Victoria Moore <Victoria.Moore@adgnt.com.au>
Sent: Friday, 21 August 2026 2:22 PM
To: Ellen Shannon
Cc: Planning; Dawn Parkes; Sally Graetz
Subject: RE: PA2026/0205 - Amendment to NT Planning Scheme - Infill development - Darwin International Airport comments

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Ellen,

Many thanks for getting in touch about ADG's response regarding infill development.

Given the current limitations of the *Land in Proximity to Airports* overlay, can we instead please seek to exclude any Zone LR lots that lie within the endorsed ANEF contours.

Kind regards,

Victoria

Victoria Moore | Regulatory & Planning Manager | Airport Development Group Pty Ltd

📞 +61 481 192 000 | ✉️ Victoria.Moore@adgnt.com.au

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ADG acknowledges past and present Larrakia, Arrernte and Warumungu peoples, Traditional Custodians of the land on which we operate.

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From: Ellen Shannon <Ellen.Shannon@nt.gov.au>

Sent: Friday, 21 August 2026 1:24 PM

To: Planning <planning@adgnt.com.au>

Cc: Dawn Parkes <Dawn.Parkes@nt.gov.au>; Sally Graetz <Sally.Graetz@nt.gov.au>

Subject: [EXTERNAL] PA2026/0205 - Amendment to NT Planning Scheme - Infill development - Darwin International Airport comments

Warning: This email originated from outside the organisation.

Good Afternoon Victoria,

I am emailing regarding your comments on PA2026/0205 - Amendment to NT Planning Scheme - Infill development. Thanks for sending them through.

I wanted to flag something in relation to your request that the *Land in Proximity to Airports* overlay be added to the exclusion criteria similar to flooding and storm surge. Currently, the overlay doesn't apply to any Zone LR or other urban residential zones. As a result, adding exclusion criteria as you have suggested is not going to achieve what you are after which is to limit development and subdivision on Zone LR lots that are within the ANEF contours.

In light of this, I would welcome any further comments or suggestions you may have. Alternatively, please feel free to give me a call on the number below if you would like to discuss further.

Kind Regards,

Ellen Shannon

Senior Planner – Statutory Policy

Lands Planning

Department of Lands, Planning and Environment

Floor 1, Energy House, 20 Cavenagh Street, Darwin
GPO Box 1680, Darwin, NT 0801

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e. ellen.shannon@nt.gov.au



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The NT Government acknowledges the Aboriginal people and cultures of the land and country on which we work and live. We acknowledge the ongoing connection to culture, land, sea and community and pay our respects to Elders past and present and to emerging leaders.

28 July 2026

Senior Planner
Development Assessment Services
Department of Infrastructure, Planning and Logistics
Floor 1, Energy House, 18-20 Cavenagh Street,
Darwin GPO Box 1680, Darwin, NT 0801

File reference
EFILE 2026/12820

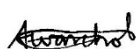
Dear Senior Planner

Re: PA2026/0205 proposed planning scheme amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR Territory-wide

Thank you for the opportunity to comment on the above proposed planning scheme amendment. Medical Entomology is supportive of the proposed amendment, as existing urban residential lots are already covered by mosquito control programs such as drainage and insecticide control. Therefore, there will be no impact on Medical Entomology as a service authority.

Please contact me if there are any queries with this letter.

Yours sincerely



Allan Warchot
Advice and Control Officer

20 August 2026

Ms Ellen Shannon
Development Assessment Services
Department of Lands, Planning and Environment
GPO Box 1680
DARWIN NT 0801

[E DevelopmentAssessment.DLPE@nt.gov.au](mailto:DevelopmentAssessment.DLPE@nt.gov.au)**T** 08 8999 4446

Our Ref: DLPE2026/0301
Your Ref: PA2026/0205

Dear Ms Shannon

Re: PA2026/0205 Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR

The information provided for the above application has been assessed by the relevant divisions within the department, and the following comments are provided:

Environmental Regulation Division

Under the *Waste Management and Pollution Control Act 1998* (NT) (WMPC Act), all persons have statutory obligations to take all reasonable and practicable measures to prevent or minimise pollution and environmental harm, and to reduce the amount of waste generated. This is known as the General Environmental Duty, set out in section 12 of the WMPC Act. The proponent is responsible for ensuring that their activities comply with these obligations.

Guidelines to assist proponents to avoid environmental impacts are available on the Northern Territory Environment Protection Authority (NT EPA) website¹.

The proponent is advised to take notice of this non-exhaustive list of environmental issues that should be considered to help satisfy General Environmental Duty:

1. **Dust:** The proponent must ensure that nuisance dust and/or airborne particles are not discharged or emitted beyond the boundaries of the premises.
2. **Noise:** The proponent must ensure that the noise levels from the proposed premises comply with the NT EPA Northern Territory Noise Management Framework Guideline².

If the proposal is situated where there are existing activities nearby that may already generate noise, please see the NT EPA advice on Recommended Land Use Separation Distances³.

3. **Erosion and Sediment Control (ESC):** The proponent must ensure that pollution and/or environmental harm do not result from soil erosion.

¹ <https://ntepa.nt.gov.au/publications-and-advice/environmental-management>

² https://ntepa.nt.gov.au/_data/assets/pdf_file/0004/566356/noise_management_framework_guideline.pdf

³ https://ntepa.nt.gov.au/_data/assets/pdf_file/0006/453192/guideline_recommended_land_separation_distances_oct.pdf

ESC measures should be employed prior to and throughout the construction stage of the development. Larger projects should plan, install and maintain ESC measures in accordance with the current International Erosion Control Association (IECA) Australasia guidelines⁴.

Where sediment basins are required by the development, the NT EPA recommends the use of at least Type B basins, unless prevented by site specific topography or other physical constraints.

Basic advice for small development projects is provided by the NT EPA document: Guidelines to Prevent Pollution from Building Sites⁵.

4. **Storage:** Where an Environmental Protection Approval or Environmental Protection Licence is required, the proponent must act in accordance with that authorisation.

If an Environment Protection Approval or Environment Protection Licence is not required, the proponent should store liquids only in secure bunded areas in accordance with VIC EPA Publication 1698: Liquid storage and handling guidelines⁶. Where these guidelines are not relevant, the storage should be at least 110% of the total capacity of the largest vessel in the area.

5. **Site Contamination:** If the proposal relates to a change of land use or if the site is contaminated, a contaminated land assessment is required in accordance with the National Environment Protection (Assessment for Site Contamination) Measure (ASC NEPM). The proponent is encouraged to refer to the information provided on the NT EPA website⁷ and the NT Contaminated Land Guidelines⁸.
6. **Waste Management - Import and Export of Fill:** The proponent must ensure all fill imported or exported as part of the activity is certified virgin excavated natural material (VENM) in accordance with the NSW EPA guidelines⁹.

All imported fill material must be accompanied by details of its nature, origin, volume, testing and transportation details. All records must be retained and made available to authorised officers upon request. The proponent should also consider the following NT EPA fact sheet: Illegal Dumping - What You Need to Know¹⁰.

7. **Odour or Smoke:** The proponent must ensure that nuisance odours or smoke are not emitted beyond the boundaries of the premises.

If the proposal is situated where there are existing activities nearby that may already generate odour or smoke, please see the NT EPA advice on Recommended Land Use Separation Distances¹¹.

8. **Water:** The proponent must ensure stormwater is not polluted, refer to water management in the NT EPA guidelines to Prevent Pollution from Building Sites¹².

If the activity requires the discharge of waste to water or could cause water to be polluted, then a waste discharge licence under the *Water Act 1992* (NT) may be required. Please refer to the Guidelines¹³.

⁴ <https://www.austieca.com.au/publications/best-practice-erosion-and-sediment-control-bpesc-document>

⁵ https://ntepa.nt.gov.au/_data/assets/pdf_file/0010/284680/guideline_prevent_pollution_building_sites.pdf

⁶ <https://www.epa.vic.gov.au/about-epa/publications/1698>

⁷ <https://ntepa.nt.gov.au/your-environment/contaminated-land/investigating-contaminated-land>

⁸ https://ntepa.nt.gov.au/_data/assets/pdf_file/0020/434540/guideline_contaminated_land.pdf

⁹ <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/virgin-excavated-natural-material/>

¹⁰ https://ntepa.nt.gov.au/_data/assets/pdf_file/0008/285740/factsheet_illegal_dumping_what_you_need_to_know.pdf

¹¹ https://ntepa.nt.gov.au/_data/assets/pdf_file/0006/453192/guideline_recommended_land_separation_distances_oct.pdf

¹² https://ntepa.nt.gov.au/_media/waste-and-pollution/pdf/guidelines/guideline_prevent_pollution_building_sites.pdf

¹³ https://nt.gov.au/_data/assets/pdf_file/0016/1131073/waste-discharge-licensing-guidelines.pdf

Should you have any further queries regarding these comments, please contact the Development Coordination Branch by email DevelopmentAssessment.DLPE@nt.gov.au or phone (08) 8999 4446.

Yours sincerely



Maria Wauchope
Executive Director Land Resources

Lands Planning
Department of Lands, Planning and Environment
GPO Box 1680
Darwin NT 0801

Dear Lands Planning

Re: PA2026/0205 Infill development and subdivision - New Application Submitted

The Northern Territory Fire and Emergency Services has assessed the information contained in the new application for PA2026/0205 Infill development and subdivision and advises there are no objections to the application. However, the Northern Territory Fire and Emergency Services recognizes that reducing the minimum land size and allowing more types of home in Zone LR will increase living density and potential fire risk.

If you have any questions or require further information, please contact Fire Safety Command, NT Fire and Rescue Service via email: fire.safety@pfes.nt.gov.au.

Yours sincerely



Krystel Harvey
Director Strategic Services
Northern Territory Fire and Emergency Services
19 August 2026

From: Caesar Yik
Sent: Tuesday, 25 August 2026 10:22 AM
To: Ellen Shannon
Cc: Demand Planning PWC; Santos Sukumaran; Goutham Maddirala
Subject: Power response to PA2026/0205 - PA2026/0205 - Planning Scheme Amendment - Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR

Hi Ellen,

Power and Water's Demand & Network Planning group has reviewed the proposed amendments from an electricity network planning perspective and advised the following:

1. The proposed increase in residential density within existing Zone LR areas will increase electricity demand requirement as additional dwellings are developed. This may have implications for the existing electricity distribution network, particularly in areas where the network was originally designed to service lower residential densities.
2. Increased load requirements may result in the need for network augmentation, including:
 - **Distribution transformer upgrades** – replacement or installation of additional distribution transformer capacity
 - **Distribution feeder upgrades** – augmentation of existing HV feeders
 - **Upstream network upgrades** – Increase the capacity of existing Zone Substations (or) build new Zone Substations, and transmission line upgrades
3. The extent of any required network augmentation will depend on the location, scale, timing and cumulative uptake of development within the affected areas.
4. As the proposed amendment applies broadly across Zone LR areas and does not specify the location, timing or extent of future development uptake, the specific network augmentation requirements cannot be determined at this stage. These requirements should be assessed as part of future subdivision and/or development applications, where the proposed development and associated electrical load are known and network modelling can be undertaken where required.
5. The explanatory document also acknowledges that increased development intensity may require upgrades to existing infrastructure, with the cost of necessary works to be borne by the developer.

If you have any future queries, please contact Santos Sukumaran, Specialist Planning Engineer (Demand & Network Planning, Power Services) on 8995 5801.

Regards

Caesar Yik

Distribution Development Engineer
Power Engineering | Power Services
T 08 8924 5042 M
Caesar.Yik@powerwater.com.au

Power and Water Corporation

Level 1, BHC 1, Ben Hammond Complex,
15 Iliffe Street, Woolner
PO Box 37471 Darwin NT 0821



powerwater.com.au

I acknowledge the Traditional Owners and Custodians of the lands on which I live and work and pay my respect to Elders past and present.

From: Ellen Shannon <Ellen.Shannon@nt.gov.au>

Sent: Monday, 24 August 2026 3:27 PM

To: RecordsManagementUnit PWC <RecordsManagementUnit.PWC@powerwater.com.au>

Subject: Public Exhibition for infill development and subdivision amendment has FINISHED

Hi,

I am emailing regarding PA2026/0205 - Planning Scheme Amendment - infill development and subdivision in Zone LR. Exhibition finished on Friday 21st August and wanted to follow up to see if you were intending to lodge a submission? We haven't got anything on record from you so If you don't intend to lodge are you able to let me know?

Any questions give me a call on the number listed below.

Thank you,

Ellen Shannon

Senior Planner – Statutory Policy
Lands Planning
Department of Lands, Planning and Environment

Floor 1, Energy House, 20 Cavenagh Street, Darwin
GPO Box 1680, Darwin, NT 0801

t. 08 8999 7684

e. ellen.shannon@nt.gov.au



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From: Planning NTG

Sent: Thursday, 13 August 2026 10:58 AM

To: Planning NTG <Planning.NTG@nt.gov.au>

Subject: REMINDER: Public Exhibition for infill development and subdivision amendment closes 21st August

Good morning,

This is a reminder that public exhibition for the proposed planning scheme amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR **closes on Friday 21st August**. The amendment proposes to reduce the minimum lot size and allow more types of homes in Zone LR Territory-wide.

This application can be viewed and comments can be made through ILIS or [Development Applications Online](#) until 21/08/2026. **If you do not intend to make a submission it would be great if you could reply to this email letting us know.**

If you have any enquiries, please feel free to contact Lands Planning Darwin, 8999 8963.

Kind Regards,

Planning NTG

Lands Planning

Department of Lands Planning and Environment

Floor 1, Energy House, 18 – 20 Cavenagh Street, Darwin

GPO Box 1680, Darwin, NT 0801

t. 08 8999 1300



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Container No: F2020/1792

DLPE - Development Assessment Services
GPO Box 1680
Darwin NT 0801

Dear Ellen Shannon

RE: PA2026/0205 - Amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and allowing more types of homes in Zone LR

In response to the above proposal for development application purposes, Power and Water Corporation (Water Services) advise the following with reference to water and sewer enquiries:

Power and Water have no objections or requirements for the proposed amendment to the NT Planning Scheme 2020 (NTPS) but do offer the below notes for consideration.

Notes:

- Power and Water do not expect the water and sewer demand to reduce proportionally with smaller LMR lot sizes as it is primarily driven by the number of dwellings rather than lot area.
- Water and sewer assessment will be on a per dwelling basis as is done in the NT supplement to the relevant WSAA supply codes.
- In most instances, we expect the network will be capable of supporting the change. **However, where upgrades are triggered as a result of the change, the developer will be responsible for the required augmentation.**
- For master planned subdivisions/developments currently underway which may have undeveloped or partially developed LMR lots present, changes to densify under the amendment would trigger a need for updated water and sewer assessment. Depending on the scale of densification proposed, this may trigger a requirement for an update to the overall master plan for water and sewer.

If you have any further queries, please contact the undersigned on (08) 9463 2089, or email developer.concierge@powerwater.com.au

Yours sincerely



Craig Thomas
Services Development

20 August 2026

cc: NTG Planning
email: planning.ntg@nt.gov.au

Ellen Shannon
Development Assessment Services
GPO Box 1680
Darwin NT 0801

Dear Ellen

Re: WHOLE OF THE NORTHERN TERRITORY – PLANNING SCHEME AMENDMENT TO FACILITATE INFILL DEVELOPMENT AND SUBDIVISION IN ZONE LR – DEPARTMENT OF LANDS PLANNING AND ENVIRONMENT

I refer to the Development Assessment Services' correspondence of 27 July 2026 regarding Planning Application PA2026/0205 on proposed planning scheme amendment to facilitate infill development and subdivision in Zone LR.

I am pleased to advise that Transport and Civil Infrastructure (TCI), Department of Logistics and Infrastructure (DLI) has no objections in principle to the above mentioned planning scheme amendment, subject to the following comment:

- For the lots that have a boundary with NTG-controlled roads and meet the criteria of infill development and subdivision, no additional access will be permitted from the adjoining NTG-controlled roads. I.e. the existing number of access(es) to the NTG-controlled roads shall remain the same. The diagrams in Annexure A indicate examples of acceptable access plans.

Should you wish to discuss the above mentioned further, please contact TCI, DLI on telephone 8999 4556.

Please quote TCI Project No 2026-0050 in all correspondence.

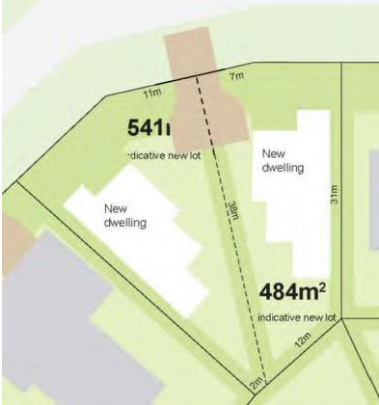
Yours sincerely



Claire Brown
General Manager, Transport and Civil Infrastructure

21 / 08 / 2026

Examples of Acceptable Access Plans for Lots Adjoining NTG-Controlled Roads:

(i) Standard subdivision creating two lots	 The diagram shows a rectangular plot of land divided into two equal rectangular lots by a vertical dashed line. Each lot contains a white rectangular area labeled 'New dwelling'. Below each dwelling, the lot area is indicated as 456m² 'indicative new lot'. A brown rectangular area is shown at the top center, representing a shared access point to the road. A vertical dimension line on the right side of the right lot indicates a width of 35m.
(ii) Battle-axe subdivision, enabling an additional rear lot	 The diagram shows a rectangular plot of land divided into two parts by a horizontal dashed line. The top part contains a grey rectangular area labeled 'Retained Existing Dwelling'. The bottom part contains a white rectangular area labeled 'New Dwelling'. A brown rectangular area is shown on the left side, representing a shared access point to the road.
(iii) Subdivision of irregular shaped lots	 The diagram shows an irregularly shaped plot of land divided into two lots by a dashed line. The top lot is labeled 541m² 'indicative new lot' and contains a white rectangular area labeled 'New dwelling'. The bottom lot is labeled 484m² 'indicative new lot' and contains a white rectangular area labeled 'New dwelling'. A brown rectangular area is shown at the top center, representing a shared access point to the road. Various boundary dimensions are indicated: 11m, 7m, 31m, 12m, and 7m.

From: [Alexander Smith](#)
To: [Planning NTG](#)
Cc: [Daniel Shane](#); [Telly Ociones](#)
Subject: Fw: REMINDER: Public Exhibition for infill development and subdivision amendment closes 21st August
Date: Tuesday, 18 August 2026 4:37:19 PM
Attachments: [image001.png](#)
[image002.png](#)
[image.png](#)

Good afternoon Planning NTG,

Thank you for your follow-up email.

I am writing to confirm that Central Desert Regional Council does not intend to make a submission regarding the proposed planning scheme amendment.

Thank you for keeping us informed.

Kind regards,



Alexander Smith

Director, Roads and Infrastructure

0448 147 495 | 08 8950 0055 | Fax 08 8959 8101

1 Elder Street, Alice Springs, NT | PO Box 2257, Alice Springs, NT 0871

Alexander.Smith@centraldesert.nt.gov.au |

www.centraldesert.nt.gov.au

Our Vision: Two ways, One Outcome – Indigenous and non-Indigenous people working together

Our Values: Creative | Respect | Integrity | Safety | Patience

Central Desert Regional Council acknowledges the traditional owners and custodians of the lands on which we work.

We pay our respects to their Elders past and present.

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From: Telly Ociones <telly.ociones@centraldesert.nt.gov.au>

Sent: Tuesday, August 18, 2026 4:03 PM

To: Daniel Shane <Daniel.Shane@centraldesert.nt.gov.au>; Alexander Smith <alexander.smith@centraldesert.nt.gov.au>

Subject: FW: REMINDER: Public Exhibition for infill development and subdivision

amendment closes 21st August

Good afternoon,

Please see email reminder below for your attention.

Kind regards,



Telly Ociones

Executive Services Manager

0497 402 521 | 08 8958 8101 | Fax 08 8958 9501

1 Bagot Street, Alice Springs, NT | PO Box 2257, Alice Springs, NT 0871

Telly.Ociones@centraldesert.nt.gov.au | www.centraldesert.nt.gov.au

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From: Planning NTG <Planning.NTG@nt.gov.au>

Sent: Thursday, 13 August 2026 10:58 AM

To: Planning NTG <Planning.NTG@nt.gov.au>

Subject: REMINDER: Public Exhibition for infill development and subdivision amendment closes 21st August

CAUTION: This is an external email, please take care when clicking links or opening attachments.

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Good morning,

This is a reminder that public exhibition for the proposed planning scheme amendment to the NTPS 2020 to facilitate infill development and subdivision in Zone LR **closes on Friday 21st August**. The amendment proposes to reduce the minimum lot size and allow more types of homes in Zone LR Territory-wide.

This application can be viewed and comments can be made through ILIS or [Development Applications Online](#) until 21/08/2026. **If you do not intend to make a submission it would be great if you could reply to this email letting us know.**

If you have any enquiries, please feel free to contact Lands Planning Darwin, 8999 8963.

Kind Regards,

Planning NTG

Lands Planning

Department of Lands Planning and Environment

Floor 1, Energy House, 18 – 20 Cavenagh Street, Darwin

GPO Box 1680, Darwin, NT 0801

t. 08 8999 1300



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Director Lands Planning
Department of Lands, Planning and Environment
GPO Box 1680
Darwin NT 0801

Please Quote: PA2026/0205

To whom it may concern

Thank you for the opportunity to comment on proposed Planning Scheme Amendment PA2026/0205, which seeks to amend the Northern Territory Planning Scheme 2020 to facilitate infill development and subdivision within Zone LR (Low Density Residential).

We appreciate the time taken by officers from the Department of Lands, Planning and Environment to brief Council on the proposed amendment and respond to questions regarding its intent and implementation.

The proposed amendment was considered by Council at a Special Meeting of Council on 18 August 2026.

As previously advised, City of Darwin supports the principle of increasing housing diversity and facilitating appropriate infill development within established urban areas. We recognise the important role infill development can play in improving housing choice, reducing urban sprawl, enabling more people to live within established neighbourhoods, and supporting the local economy.

However, City of Darwin remains concerned that the proposed amendment is not supported by sufficient evidence to fully understand and manage the cumulative impacts of increased density on infrastructure, including stormwater, traffic and local road networks.

City of Darwin's previous recommendations regarding infrastructure capacity assessments, funding arrangements and a collaborative planning framework between the Northern Territory Government and local government remain unaddressed.

In particular, City of Darwin remains concerned about:

- The reliance on individual development application assessments to identify and manage impacts, rather than undertaking strategic suburb/catchment/local area level planning to understand the cumulative effects of increased density.



- Increased subdivision and development intensity are likely to reduce permeable surfaces and increase stormwater volumes and runoff, placing additional pressure on existing stormwater infrastructure within established suburbs. This is of particular concern in older suburbs where stormwater infrastructure may already be at or near capacity.

A strategic assessment of infrastructure capacity is required to understand these cumulative impacts and identify future infrastructure upgrades, funding requirements and implementation priorities before the proposed changes are introduced.

- The absence of a strategic assessment of traffic, parking and local road network impacts arising from increased residential density. Additional dwellings are likely to generate increased vehicle movements and place greater pressure on local roads and parking availability.
- These impacts should be assessed at a suburb level to identify any road, intersection or parking improvements that may be required to accommodate future growth and to inform future funding and infrastructure planning.
- Such an assessment would also help identify areas that are well placed to accommodate increased density, while highlighting locations that may require further consideration or infrastructure investment, like cul-de-sacs and other areas with constrained road network arrangements.

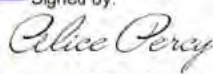
In addition, City of Darwin wishes to highlight the following matters for consideration:

- Mature trees, generous landscaping, open spaces and a low-density urban form are defining features that make Darwin and its suburbs distinct from many other Australian cities. These characteristics contribute to local amenity, urban cooling, biodiversity and community wellbeing.
- Further strategic analysis is required to better understand how increased density can be accommodated while maintaining the qualities that make Darwin's established suburbs attractive and liveable. This should include consideration of the cumulative impact of additional driveways and vehicle crossovers, which may reduce verge space available for street trees and landscaping.
- This would help identify areas that are well suited to accommodate additional housing diversity, while ensuring that important neighbourhood character and place outcomes are appropriately recognised and considered.



While supportive of the principle of infill development, Council does not support the amendment proceeding in its current form at this time and recommends that further strategic planning and infrastructure assessment be undertaken before the proposed changes are implemented.

Yours faithfully

Signed by:

ADF95EB00BBD4937

ALICE PERCY
GENERAL MANAGER INNOVATION



21 August 2026

NT Planning Commission
By Email: ntpc@nt.gov.au

Dear Sir/Madam

Re: Proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential)

City of Palmerston thanks the Planning Commission for the opportunity to provide a submission in relation to the proposed planning scheme amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential).

This submission was presented to Council and endorsed at its Ordinary Council meeting on 18 August 2026 (decision no. 11/0558). The key matters Council is seeking consideration of are outlined below, which are presented in (2) two parts:

- Part 1 - Response to specific aspects of the proposed amendment.
- Part 2 - Additional matters.

The comments provided build on Council's 23 January 2026 submission on the Low Density Residential (Zone LR) Infill and Subdivision Discussion Paper. They are not intended to repeat earlier points raised by Council, acknowledging that these have been considered in the preparation of the draft amendment.

This submission focusses on technical aspects of the proposed amendment and highlights Council's key concerns for consideration prior to the finalisation of the proposed amendment.

Part 1 - Response to specific aspects of the proposed amendment

Council requests that the following changes are considered, which are presented sequentially below in the order they appear in Appendix A - *Proposed Planning Scheme Amendment Infill Development and Subdivision in Zone LR*.

Amendment to Clause 3.6 LSF – Land Subject to Flooding

- The flood overlay should include dwelling single as a 'must not consent'. Concerns about group and multiple dwellings in flood zones should apply equally to all housing types.

Amendment to Clause 3.7 LSSS – Land Subject to Storm Surge

- The storm surge overlay should include dwelling single as a 'must not consent' for the same reason above.



Amendment to Clause 5.2.4 - Car Parking

- Vehicle access outside the property is within the road reserve, which results in this portion of the driveway being a Council asset. As such, Council requests the following additional wording as provided in *italics*:

Requirements

3. Vehicular access shall be via a single driveway, no wider than 3.5m where required by the table to this clause, *unless otherwise approved by the relevant local government council.*

Amendment to Clause 6.2.1 - Lot Size and Configuration for Subdivision in Zones LR, LMR, MR and HR

- Battle-axe blocks can cause issues with access, waste collection and drainage. Council supports them in principle, but updated additional wording, as provided below, in *italics*, is recommended.

Requirements

8. Battle-axe lots are to be avoided unless located in Zone LR and:
 - a) the configuration is necessary due to site irregularity; or
 - b) the configuration enables the retention of an existing dwelling; and
 - c) *prior written consent has been provided by the relevant local government Council regarding the serviceability of access, waste and drainage.*
- Council recommends retaining requirement 10. It is considered particularly pertinent for zone LR, where development is to occur only where full reticulated services are available.

Requirements

10. Lots are connected to reticulated services.

Part 2 - Additional matters

Council supports infill development in Zone LR in suitable locations where servicing is practicable and where there is convenient, easy access to local facilities and community infrastructure.

Council remains concerned about the broad approach to infill and intensification provided by the amendment for the following reasons.

- a) The strategic framework supports infill development and intensification in areas close to facilities and services, informed by infrastructure capacity, whereas the proposed amendments are governed primarily by lot size. This risks undermining the role of the strategic framework and creating a disconnect between strategic land use plans and statutory controls.
- b) Infrastructure constraints and servicing issues currently exist in some older neighbourhoods, and a broad approach that doesn't fully assess servicing requirements risks existing issues being exacerbated.
- c) An integrated strategic approach informed by servicing capacity and neighbourhood context is still considered a more balanced and preferred approach. At a minimum and as recommended, consideration should be given to including statutory controls around service and infrastructure constraints, as well as mandating pre-lodgement meetings with local government Councils and other servicing authorities ahead of individual applications being submitted.

Summary

Council is generally supportive of infill development in Zone LR, provided it occurs in appropriate locations and where servicing is practicable. Further consideration should be given to the role of the strategic framework in informing better outcomes and ensuring appropriate levels of community and service authority consultation is occurring.

Additional statutory controls informed by infrastructure constraints is recommended, alongside mandating pre-lodgement meetings with local government councils and service authorities ahead of individual applications being submitted.

Without strategic direction and added statutory controls, there is a risk that development permits are issued with conditions that developers and proponents cannot meet.

Please contact Councils planning and development team at development@palmerston.nt.gov.au or phone 8935 9922 should you have any questions.

Yours sincerely



Nadine Nilon

Deputy CEO / General Manager Infrastructure

COOMALIE COMMUNITY GOVERNMENT COUNCIL



22 Cameron Road Batchelor NT 0845

PO Box 20 Batchelor NT 0845

Phone: 08 8976 0058

Fax: 08 8976 0293

Email: mail@coomalie.nt.gov.au

Web: www.coomalie.nt.gov.au

21st August 2026

Development Assessment Services
GPO Box 1680
Darwin NT 0801

To Whom It May Concern

RE: APPLICATION: PA2026/0205 Infill Development and Subdivision – Proposed Planning Scheme Amendments

Council considered the Development Application PA2026/0205 at its Ordinary General Meeting held on 15th August 2026. Council requests that the following be considered in relation to the proposed amendments and impacts in the Coomalie Shire region:

1. The current provisions relating to Zone LR (Low Density Residential) that apply to the township of Batchelor be maintained and not amended with the proposed Planning Scheme Amendments. This will enable the Batchelor township to maintain its significant heritage and natural landscape that it is well known for.
2. Council requests that the NT Government considers all other options for future development in the region, including the release of Vacant Crown Land for housing development in the Coomalie Shire region, especially in both Adelaide River and Batchelor townships. This should be undertaken in a strategic assessment manner that includes all development options such as infill and subdivisions, vacant land release and green space utilisation.
3. The NT Government should undertake strategic suburb-level assessments to inform infrastructure capacity, transport and traffic impacts and community needs before enabling widespread infill development on a site-by-site approval assessment.
4. Coomalie Council supports the LGANT recommendation that the NT Government embed meaningful engagement with the local government sector into the infill development framework.
5. Coomalie Council also supports the LGANT recommendations that the NT Government undertake a comprehensive infrastructure capacity assessment prior to rezoning or development approvals to ensure existing township infrastructure can support any future developments without cost shifts or additional infrastructure burden to local government. This should include mechanisms to prevent cost shifting and additional funding to support infrastructure maintenance.

Council considered the application closely and notes the heritage and local amenity of the township of Batchelor that would be impacted by the proposed amendments to the Planning Scheme. Council's preference would be that the current provisions relating to infill and subdivision requirements for land zoned LR in the Coomalie shire maintain the current provisions and no lesser standards be introduced.

Please don't hesitate to contact me by phone on (08) 8976 0058 or by email to mail@coomalie.nt.gov.au if you require any further clarification regarding the above submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Natasha Chapman".

Natasha Chapman
Acting Chief Executive Officer





21 August 2026

Lands Planning
Department of Lands, Planning and Environment
GPO Box 1680
Darwin NT 0801

RE: Letter of Comment Planning Scheme Amendment Application

PA2026/0205

**Hun: 695 P: 02653 7 Bees Creek Road FRED'S PASS, Hundred of Strangways
Planning Scheme Amendment - proposed planning scheme amendment to the NTPS 2020 to
facilitate infill development and subdivision in Zone LR by reducing the minimum lot size and
allowing more types of homes in Zone LR Territory-wide**

Thank you for the Planning Scheme Amendment Application referred to this office on 27/07/2026, concerning the above. This letter may be tabled at Litchfield Council's next Council Meeting. Should this letter be varied or not endorsed by Council, you will be advised accordingly.

Litchfield Council provides the following letter of comment in response to the proposed Planning Scheme Amendment to facilitate infill development and subdivision in Zone LR (Low Density Residential).

Council previously provided feedback during the "Have Your Say" consultation in December 2025. Council's position remains that the proposed changes should not apply within the Litchfield Municipality.

Council's Position

Council does not support the proposed amendment in its current form.

While Council acknowledges the intent to increase housing diversity and make more efficient use of existing infrastructure, the proposal is not appropriate for Litchfield. The municipality has a distinct rural lifestyle character, a different development pattern to Darwin and Palmerston, and sufficient land available to accommodate a range of lot sizes and housing typologies through planned development.

There is no demonstrated need for broad-scale infill development within existing Zone LR areas in Litchfield. Current land supply meets demand. Introducing infill rights would risk:

- altering the established rural and low-density character of the municipality;
- reducing privacy, open space and residential amenity;

- increasing traffic, noise, parking and local service pressures;
- placing additional demands on roads, stormwater infrastructure, waste services and community facilities; and
- creating additional regulatory, maintenance and service delivery responsibilities for Council.

Council's previous submission identified infrastructure constraints in areas such as Coolalinga, including sewer capacity limitations, and ageing or constrained trunk infrastructure in other activity centres. These matters should be resolved through appropriate infrastructure strategies before any additional development pressure is introduced.

Existing opportunities under Zone LMR

Council notes that the NT Planning Scheme already provides for higher-density residential development through Zone LMR (Low–Medium Density Residential). Zone LMR is intended to accommodate a greater range of dwelling types and densities than Zone LR and can be applied to locations that are strategically suited to increased density.

In Council's view, the existing LMR zone already provides a mechanism to deliver increased density where it is appropriate, without also introducing additional density rights within Zone LR. If higher-density outcomes are sought particularly in Greenfield development, the Planning Scheme already contains a suitable zone for that purpose.

Council considers that it is preferable to direct density to locations that are planned and serviced for that outcome, rather than enabling additional development rights across all LR-zoned land.

Identified infill areas and mapping

Council has reviewed the indicative mapping provided with the proposal. The mapping appears to identify potential infill sites primarily on the basis of lot size, configuration and the exclusion of land affected by flooding or storm surge.

In the Litchfield Municipality, the mapping does not appear to reflect local conditions or infrastructure constraints. For example, in the Humpty Doo locality, the mapping identifies only four lots as potential infill sites. One of those lots is in fact a drainage reserve and park vested in favour of Council. It is not suitable for residential infill development and should not have been identified as a candidate site.

The mapping also only reflects existing 900m² lots and does not illustrate the potential extent of infill if the proposed 10% lot size variation is applied. Allowing a 10% variation to the minimum lot size would have significant implications for the number of lots potentially affected and the scale of additional density that could be realised.

This raises concerns about the reliability of the mapping and whether the proposed amendment is based on an adequate understanding of local land ownership, infrastructure capacity and planning constraints. If the mapping cannot accurately identify suitable sites at a high level, Council has limited confidence that the proposed approach will deliver appropriate outcomes at the development assessment stage.

Strategic planning and cumulative impacts

The proposal relies heavily on individual development assessment to determine whether infill development is suitable. Council considers that this approach will not adequately identify or manage cumulative impacts across a suburb, locality or activity centre.

A single development may appear acceptable when considered in isolation, but multiple approvals over time may collectively result in:

- increased traffic on roads designed for lower-density development;
- greater demand on drainage and stormwater infrastructure;
- increased wear and maintenance requirements for local roads and other assets;
- additional demand for waste, animal management and regulatory services;
- pressure on parks, open space and community facilities; and
- loss of established neighbourhood character and amenity.

Council considers that suburb-level or precinct-level infrastructure and servicing assessments should be undertaken before any general infill rights are introduced in Zone LR.

Limitations of the development assessment process

Council's experience is that the Development Consent Authority generally determines only matters within its statutory power under the Planning Act and the NT Planning Scheme.

Matters outside that statutory decision-making role are often left to Council and the developer to discuss separately, including:

- the feasibility of infrastructure upgrades;
- the detailed design and construction standards for council-owned assets;
- asset handover requirements;
- maintenance and renewal responsibilities; and
- the funding of ongoing lifecycle costs.

This creates a significant risk that a development may be approved because it satisfies the Planning Scheme, while unresolved infrastructure or servicing matters remain for Council to address with the developer.

Once an approval has been issued, Council may have limited leverage to require changes to the development or secure appropriate infrastructure outcomes. The amendment should not assume that individual development assessment will resolve matters that are outside the DCA's statutory powers.

If infill development is to be enabled, the Planning Scheme should contain clear and enforceable mechanisms addressing:

- infrastructure capacity;
- the need for council consultation;
- consideration of the NT Subdivision and Development Guidelines in reference to infrastructure design, asset handover and acceptance requirements.

Previous consultation and community feedback

Council notes that the proposed amendment follows the Northern Territory Planning Commission's 2025 "Have Your Say" consultation on infill development and subdivision in Zone LR, and the subsequent Report to the Minister outlining recommended changes to planning controls.

Council's previous submission raised concerns about cumulative impacts, infrastructure capacity, differences between municipalities, and the lack of a demonstrated need for broad-scale infill in Litchfield. Having regard to the proposed amendment as exhibited, Council considers that these matters have not been sufficiently addressed in the current drafting.

In particular, the proposal:

- continues to rely heavily on individual development assessment to manage cumulative infrastructure, servicing and amenity impacts;
- applies a broad, Territory-wide approach that does not adequately differentiate between established urban areas and rural lifestyle municipalities such as Litchfield; and
- does not clearly demonstrate why infill is required in Litchfield, given existing land supply and infrastructure constraints.

Council requests that further explanation of how the issues raised during the 2025 consultation, including those specific to Litchfield, have informed the final design of the amendment, and consider further refinements to better reflect local circumstances.

Appropriate planning approach for Litchfield

Council considers that the planning principles in existing activity centre plans should be maintained.

Where growth or increased development intensity is intended in locations such as Coolalinga or Howard Springs, that growth should be supported by:

- a clear strategic planning framework;
- infrastructure and servicing strategies;
- assessment of sewer, drainage, transport and road capacity;
- consideration of community facilities and open space;
- clear funding arrangements; and
- a defined implementation pathway.

Council does not consider that a general infill provision within Zone LR is necessary to achieve these outcomes. If higher-density development is considered appropriate in a particular location, the Planning Scheme should consider a mechanism such as 'location specific' development to accommodate that outcome in a more targeted and planned manner.

Specific comments on proposed Planning Scheme changes

The following section are Council's responses to the proposed amendments to the Planning Scheme;

	Current Provision	Proposed Amendment	Litchfield Council response
Minimum Lot Size	800m ²	450m ²	Maintain current provision
Lot Size Variations	Up to 5% reduction (minimum 760m ² lot)	Up to 10% reduction (minimum 405m ² lot)	Maintain current provision
Types of Homes	'Dwelling-group' & 'dwelling-multiple' <u>prohibited</u>	'Dwelling-group' & 'dwelling-multiple' = <u>development permit required</u>	Maintain current provision
Density	1 dwelling-single plus a dwelling-independent (i.e. granny flat)	1 dwelling per 450m ² as part of a dwelling-group or dwelling-multiple (with a maximum of 10% variation in some cases)	Maintain current provision
Minimum lot frontage (450-600m² lots)	13 metres	12 metres	Maintain current provision
Battle-axe lots	To be avoided	Allowed in limited circumstances	Maintain current provision
Subdivision on land affected by flooding and storm surge overlays	To be avoided	Prohibited on affected portion of lot	Maintain current provision
Dwelling-group and dwelling-multiple on land affected by flooding and storm surge overlays	Allowed above flood level	Prohibited on affected portion of lot	Maintain current provision

Recommendation

Council recommends that the proposed amendment:

1. Not proceed in its current form, particularly in relation to the Litchfield Municipality.
2. Exclude Litchfield Municipality from any Territory-wide changes intended to facilitate infill development in Zone LR.
3. Require further strategic and infrastructure assessment before any infill provisions are introduced.
4. Clearly demonstrate how feedback from the 2025 “Have Your Say” consultation has been considered and addressed.
5. Avoid relying solely on individual development assessment to resolve cumulative infrastructure, servicing and amenity impacts.
6. Where increased residential density is considered appropriate, utilise ‘location specific’ development requirements within the Planning Scheme;
7. Further noting that Greenfield development can utilise the existing Zone LMR provisions rather than introducing additional density rights within Zone LR.

Conclusion

Litchfield Council does not support the proposed changes to facilitate infill development and subdivision in Zone LR in the Litchfield Municipality.

Council considers that the proposal is not sufficiently justified by local housing or land supply circumstances within Litchfield, does not adequately reflect Litchfield’s rural lifestyle character, and has not demonstrated that existing infrastructure and services can accommodate the additional development pressure.

Council supports planned growth in appropriate locations, including growth within activity centres and new urban development areas where supported by infrastructure strategies and appropriate funding arrangements. However, Council considers that broad infill development within existing Zone LR areas is not the appropriate mechanism for Litchfield.

Council requests consideration of the matters raised in this submission and provide further opportunity for Council to comment on any revised statutory provisions before the amendment progresses.

If you require any further discussion in relation to this submission, please contact Litchfield Council on 08 8983 0600.

Kind Regards,



Jaimie O'Connor
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