

To: Public Accounts Committee  
GPO Box 3721 Darwin NT 0801  
Email: pac@nt.gov.au  
Date: November 2015

## **SUBMISSION TO THE PUBLIC ACCOUNTS COMMITTEE REGARDING RICHARDSON PARK DEVELOPMENT**

To the Chairman of the Public Accounts Committee.

We are concerned at the expansion project for Richardson Park. This proposal is:

- ill conceived – based on incomplete and unbalanced information, fails to address larger and more difficult issues, sinks costs into a site with limited future expansion options
- not Value For Money – it is a short term answer to a longer term problem, spends funds on a B-grade solution
- is not in the best interests of stakeholders – supported by some, but opposed by many affected groups and individuals, it is not adequately supported by the sports fraternity
- will have lasting planning and environmental effects for the location and surrounding areas, whereas these could be ameliorated at other sites
- the development process has been bypassed and is being rushed unnecessarily and so goes against the tenants of good and accountable Government
- full costs of construction have either been missed or glossed over

Whilst local residents can accept refurbishment of the derelict site to bring it to a usable condition, the expansion to hold over 10000 spectators is not an appropriate use of government money. A significant expenditure is to be undertaken to meet the occasional needs of a small group – a better option would be to plan for a longer term investment where shared use of infrastructure and supporting facilities may be possible, in an area that has adequate access, parking, noise and light buffer zones and options for future expansion – especially as the life of the project is expected to be somewhere between 25 to 50 years. Such a proposal would require development of sports infrastructure master plan, phased funding and staged long term development.

The planning process has been bypassed for inappropriate haste – to meet personal aspirations and probably to appear finished before the completion of term of the current Government. Whilst Governments should determine timeframes to meet overall government and departmental considerations, the need for the site to host the 2016 NRL game in Darwin at Richardson Park is derelict and irresponsible – this artificial timeframe translates in a compressed construction timeframe and will increase costs of construction. Emotive and personal reasons should not cloud expenditure of public funds.

### **The Site**

The site size and location impose numerous limitations. The site cannot be further expanded should this be required in the mid to longer term future. The Government's attempt to use Ludmilla School playground area shows lack of understanding and poor judgement. Compensatory works such as improved school access, whilst possibly beneficial to the school, further increases the expenditure relating to this project. Specific concerns for the site are:

- mangroves to the North – issues include threatened species, storm surge, biting insects, significant cost to reclaim land, and difficulties to deal with salt, sulphur, tide and storm surge
- Ludmilla School to the East – affects ability of the school to expand to meet changed demographics; the offer by NT Government to redevelop school entrance and access adds unnecessary cost to the Richardson Park project and the school grounds block further expansion of stadium site
- bushland to the West – planning guidelines call for 10% open space, whereas Ludmilla currently has only 2.68%; the loss of small open bushland to Richardson Park further reduces availability, the open land is managed as Ludmilla Creek area and is a recognised natural area, widely used by locals
- residential area to the South - no buffer zone between Richardson Park and houses, small local traffic-capable roads; effects of noise, traffic, parking, lights will impact permanently on lifestyle, loss of bush screening and extension of Ludmilla Terrace to South-West of stadium will degrade residential precinct
- access to the site is limited as it is only via Richardson Drive, through Douglas Street – unless costly new road access is delivered, traffic will bottleneck along Douglas Street
- Richardson Park is not supporting easy access to most players – it is in inner Darwin rather than more centrally located for convenient access to most players and spectators – why not use Marrara or a site past the ‘Berrimah Line’
- soil quality is poor at Richardson Park – salt and sulphur contamination will require constant maintenance; there was an underground spring discovered during previous park development affecting oval quality – unforeseen aspects will be costly to counter
- isolated location – development of this small pocket of land does not allow shared use of facilities – this means costs cannot be amortised widely, maintenance costs are proportionally high and security of the site is more difficult/costly
- historical significance – as the ‘historic home’ of NTRL, the site is deemed important and must be retained – such emotive reasons do not make practical sense – look at the growth and success of professional sports clubs who have moved from their historic homes, eg Sydney Swans from South Melbourne, Western Bulldogs from Footscray, Brisbane Lions from Fitzroy

Overall there are better sites to redevelop that offer expansion and future development options where facilities can be shared, costs offset and access for players and spectators improved.

NTRL is being singled out for a significant upgrade to current facilities, however, other codes, who we are told do not want to cooperate, will miss out. Whilst the 2012 NTRL submission soundly suggested that a move to Marrara was in their best interests, this has been overturned by the current proposal. The “this or nothing” option cited in the press does not make for reasonable and full consideration of the needs of the NTRL and broader sporting fraternity.

### **Expenditure requirements**

The budget of \$20m is not complete and does not represent the true cost of development at Richardson Park – this is misleading and does not allow fair comparison to the Marrara option. The Richardson park budget does not include:

- pre-works – approx. \$1m in consultancies and draining needs – already underway
- car parking and road works, including traffic lights and Dick Ward Drive upgrade

- sound and visual barriers
- any extension to Ludmilla Terrace
- rework of the Ludmilla school entrance and any other school amelioration
- any indication of the annual operating costs – expected to be \$0.5 to \$1m pa – it was unaffordable at \$0.25m pa

It is therefore expected that the Richardson Park option costs are likely to exceed \$30m - which is not a valid expenditure for such a limited site with occasional use for just one sporting code.

An earlier plan released by the NT Government priced a 6000 permanent seat redevelopment at Richardson Park at \$20m, however the current proposal is now 3850 permanent and 6850 temporary seats and additional oval for the same cost. The comparative Marrara option, being used to discredit development there, also appears ill defined and has varied several times already, with costs quoted as \$30m, \$40m and \$70m. A greenfield site has been similarly costed at \$140 m. Given there are existing road, parking and services at Marrara, a progressive upgrade could be achieved within the existing financial limitations. The need for the two NRL night games per year, for the remaining two years of the NRL contract, could be conducted within existing Marrara facilities rather than at a specially constructed Richardson Park. A Marrara masterplan could be developed and progressively delivered to allow broader appeal at a more affordable cost.

Overall robust and transparent costs for both options are required. This has not been evident and therefore the ability to decide on the better option clouds NT Government decision making. More time for development and consideration of options is required.

#### **Future Darwin Development Considerations**

The proposed Richardson Park redevelopment can be expected to have a life of 25 to 50 years, and so must be scalable to meet current requirements and future needs. Of concern is that the site is not one which has the ability for future expansion; it is being developed in isolation from other sports facilities and it is not situated in the growth corridor for population growth or amenity development.

Whilst there is ongoing redevelopment of living spaces within inner Darwin, major growth corridors are underway in Palmerston, Coolalinga and will soon commence at Berrimah Farm. Any sensible supporting infrastructure should be readily accessible to these new suburbs – a development in inner Darwin goes contrary to planned development for these sites. Marrara is accessible to all these developments, and a more out of town site could be developed with simpler access, ease of use and so potentially higher usage rates; these would be expected to increase over time in line with population increases.

Adequate planning and full consultation would have identified all requirements for an improved NTRL facility to best meet current and future needs. Of note is that only 50% of the NTRL wanted to stay at Richardson Park in preference to a Marrara option. Increased construction costs could have been amortised as part of overall community support infrastructure, with cost offsets through normal development processes. The long term benefits would mean a site with better access in the immediate and longer term, whereas a Richardson Park development is contrary to urban growth and sinks costs in a site that may need to be duplicated or even abandoned in the medium to long term. The Richardson park site, therefore, is a more expensive option in the longer term than one that accounts for planned urban growth.

#### **Lack of Due process**

The announcement of the Richardson Park redevelopment reveals that the planning process appears to have been bypassed and short cut. Anecdotal advice is that:

- the press release was made before the Department of Lands and Planning had approved the application
- there was no application to the DCA, no public signage and submission request (pink signs) on site even though significant changes were made to zones and fence lines.
- there were no blue slips requesting input from other NT Government Departments
- public advice of boundary and land use changes were authoritatively issued by the NT Government, there was no application to the DCA for these changes. This is in breach of the NT Planning Act as the project at this time was not a 'major Project' with the Chief Minister
- even though the project does not technically meet the definition of a Major Project it become one after the first concept was released to avoid scrutiny and full developmental process
- application to recommence a business was not made to the DCA, even though the NTRL business operation had been abandoned on site for more than 12 months – this is a breach of the Planning Act

Stakeholder consultations were limited and haphazard:

- community residents were not consulted and found out about the proposal in a mail box drop the afternoon of the press announcement
- Ludmilla school consultation did not occur formally occur until two days before the press announcement
- Darwin Turf Club and the Planning Commission learned of the development in the press announcement, not having been previously consulted
- the working group advising government on this project does not include residents or school representation
- inadequate costs and proposal transparency cloud objective analysis and assessment of the proposal or its alternatives
- a tender for the analysis of traffic and road needs had yet to be let before the Richardson Park design and construct tender release – normally these are completed before the scope of such projects can be confirmed – costs and effects are still to be determined and could seriously affect project affordability
- the rush to complete has been stated so that the 2016 NRL Parramatta Eels game can be played at the site – whilst the Treasurer admits he is keen to see this match at Richardson Park, the undue haste means shortcuts in process must occur and it is likely that additional costs will be incurred to avoid contractual penalties should there be delays: such haste does not improve the chances of a Value For Money decision.

Whilst the development is being undertaken as a Major Project, and is coordinated via the Department of the Chief Minister, the decision should still follow the tenants of good government in process and decision making – openness, transparency and value for money should be achieved, however, are not evident in this case. Personal whims and biased decision making are forcing through this development at the expense of objectivity.

### **Residential concerns**

Ludmilla and Parap residents surrounding the Richardson Park site are concerned with the proposed expansion and development associated with this proposal. The development will permanently

change their residential amenity and environment. Of significant concern are traffic, parking, noise, lights and disruption during Richardson Park events. Privacy issues in currently quiet residential precincts will be permanently disrupted, probably with increased frequency than originally occurred. Of note is that a previous application by the Darwin Turf Club to upgrade night lights was rejected because of adverse effects on the neighbouring households – in this case the lighting effects are expected to be more invasive and detrimental.

Planning considerations expect 10% open space for the Ludmilla area, however, only 2.68% exists currently. This development will not allow the shortfall to be addressed.

Appropriate redevelopment of the site would actually provide improved amenity – for example parkland open space with shared facilities – basketball court, skate park, picnic facilities, bike tracks etc all could support better urban design. Development into a bigger, more crowded and busier facility goes contrary to improved suburban development.

Residents will ultimately pay the price for this development. Should it go ahead, loss of amenity and lifestyle ultimately translates into lower house values, which could affect the 400 plus households ranging from 420 to \$50k reduction in land value.

### **Required outcomes**

The Richardson Park development in its current form is irresponsible because it is rushed, ill conceived, and of limited longer term benefit. It is not financially viable and so must be subsidised by NT Government to remain operational. Preferred options exist, but full costs, identification of all supporting present and future requirements and holistic future planning is required. Accordingly it is suggested that Government:

- immediately halt the tender process
- fully and appropriately consult with all stakeholders
- develop and consider realistic options and costs
- follow the established planning and development processes for such an important development.

We respectfully request that the Public Accounts Committee fully considers and investigates issues identified in this submission. We would be prepared to present aspects of this submission in person to the Committee, however, are not available on 12 November 2015.

Yours sincerely

Cherill and Brad Hopkins

Ludmilla