



Legislative Assembly for the
Australian Capital Territory

Standing Committee on Environment
and Planning

Submission Cover Sheet

Inquiry into DPA-07 - Former Braddon Bowls Club

Submission number: 001

Submitter: Braddon Tennis Club Committee

Date authorised for publication: 23 April 2026



15 April 2026

Representation to: Development Application no. [REDACTED] - [REDACTED]
[REDACTED]

Submitted online

The Braddon Tennis Club Committee (the Committee) has engaged at appropriate times since 2023 with developer Purdon Planning/Bulum Group and the ACT Government - Land and Planning Services, regarding the proposed development at [REDACTED]

The Committee continues to express the same concerns that follow. While the Braddon Tennis Club (the club) recognises the opportunities the mixed-use development may bring to inner north Canberra, the scale and bulk of the design greatly impact on the viability of the club.

Evidenced by the newly submitted design, the scale and bulk of the building have remained largely unchanged since the first community consultation in 2023 (and subsequent DA in 2024). Specifically, there is no consideration being given to the height of the building, and the degree of shadowing that will result in the two front clay courts of the club. The club has four clay courts.

The proposed DA does not respond to urban context in the sense it ignores the specific tennis club amenity of community clay tennis courts for public use and the social cohesion that people from all walks of life enjoy regularly.

Key issues for the club

Shadowing of clay courts

As outlined above, the newly submitted design does not consider the degree of shadowing that will result in the two front clay courts of the club. Therefore, the club and governing body, Tennis ACT strongly oppose the proposed development, particularly along the boundary shared with the club as shadowing will have detrimental impact on the club. To support this, correspondence from Tennis ACT dated 8 April 2026 and 29 July 2024 is found at **Attachment A**. The club's representation in 2024 is **Attachment B**.

Clay court characteristics

Clay tennis courts require good sunlight exposure throughout the day to remain playable. Sunlight aids with moisture management, helping the surface dry after rain, dew or frost. Without adequate sun, clay courts can remain soft, slippery, and unsafe for extended periods, and are more susceptible to algae growth and ongoing maintenance issues.

The Committee has obtained expert advice from the installer of the clay courts, ET Richards, that further supports the Committee's argument that sunlight is an essential element of maintaining clay courts, this is at **Attachment C**.

Similarly Tennis Victoria has developed specific [guidance on maintenance of clay courts](#), which also supports the points above that clay courts need sunlight to be playable. The guidance also highlights the additional maintenance clay courts require over other court surface types.

Club viability

Shadowing would delay the start of play and coaching until the courts were of a sufficient condition, resulting in loss of revenue for both the club and coach as well as affecting the club membership. Shadowing from the current proposal would make two of the four courts unplayable during peak periods.

The Committee anticipates this will be exacerbated when the adjacent land at 20 Farrer St Braddon (also owned by Bulum) is developed – the same shadowing issues will arise; in this instance the shadowing will affect the two rear clay courts of the club. The Committee is concerned that approved plans for 21 Elder street Braddon will set a precedent for the adjacent land at 20 Farrer Street Braddon.

Financial sustainability of the club

The impact to the financial sustainability of the club in its current form would be compromised greatly for the reasons outlined in this response, and the Committee's objection would stand until a suitable compromise can be reached.

Why clay is an important aspect of the club

The club is one of very few in the Canberra region to have European style clay. Canberra has a distinguished history of producing talented tennis players from suburban clubs.

Additionally, the clay courts are also often booked by junior tennis players from Australia and abroad as a practice venue during competition play at Canberra Tennis Centre. Shadowing would greatly impact the club's ability to host these players. This is further outlined in the letter of support from Tennis ACT.

Clay courts are suitable for a broad range of players as the surface is gentler on the body, with a higher ball bounce and opportunity for longer rallies. Club members, the public and school children from neighbouring Ainslie Primary School all place a premium on the value of sunlight to physical health and mental wellbeing. Shadowing erodes this asset.

Crown lease

It is a Tennis ACT and Crown lease requirement that the club maintain four clay courts. Any other surface would breach the Crown lease requirement.

Other concerns

Noise

Court hire at the club is from 7am to 10pm, and sometimes play will continue after 10pm, particularly given the club is part of the Canberra Tennis League event that runs over all seasons. We are concerned that voices may be able to be heard by the neighbouring development and will cause ongoing guest complaints. Although little can be done about noise relating to speech.

Parking

The club anticipates that, during the development's construction, tradespeople will use the club parking lot (and the verge) unauthorised. While Bulum Group have suggested that their neighbouring block at 20 Farrer St will be used for parking, the club poses that the development is so dense that the neighbouring block will be used for materials handling, plant and site amenities and will quickly reach capacity before consideration of sub-contractor vehicles.

The club anticipates that users of the completed development will use the club parking lot (and the verge) unauthorised when the volume of vehicles exceeds the development's onsite parking or the parking is inconvenient (tight basement) or poorly managed. The club does not want to enter an ongoing adversarial relationship with its neighbours, particularly when the individual offenders will be transient (as will be the case for a commercial / short stay residential development).

Lighting

The design of the development uses the footpath between Farrer and Elder streets as a pedestrian accessway. The club notes the importance of providing sufficient lighting in this accessway for safety and security. Lighting should not impede court playability (i.e. shielded at eyeline, not directional at the courts).

Existing Amenity

The club has existed for close to one hundred years and has maintained an excellent relationship with its neighbours. Courts are used between 7am and 10pm. A coaching business, run by a local resident, runs out of the club and supports a strong relationship with the students of Ainslie Primary School.

Small, local tennis clubs are a signature of inner-city Canberra, they are an important, distinctive element of the Capital's garden city design and heritage. The pre-DA advice (in 2024) from the NCDRP emphasised the need to be sensitive to the local community and that the design needs to better align with Braddon's 'place' attributes. The committee is not confident that the submitted design has improved upon the pre-DA design.

We trust the ACT Land and Planning Services will consider and consult with the committee on these issues in consideration of granting a DA.

Kind regards,

Braddon Tennis Club Committee

[Redacted Signature]

Attachment A Tennis ACT correspondence 2024 and 2026

Attachment B The Club's representation correspondence of 2024

Attachment C ET Richards correspondence re shadowing of clay courts.



Territory Planning Authority
ACT Government
8 April 2026

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tennis.com.au/act
Tennis ACT Limited
ACN 131 826 554
ABN 22 131 826 554

To Whom it may concern:

Re: Development application for multi-level hotel and spa development in .

Tennis ACT has noted the progression of the application for the development of a multi-level hotel and recreation facility on the site adjacent to the Braddon Tennis Club. We stand by our support for the objection lodged by the Braddon Tennis Club in 2024.

The extent of the shading of the tennis court areas clearly identified in the shadow diagram provided by the developer have undeniable negative consequences for the operation of a clay court venue, severely impacting the ability of the club to be operated in a sustainable manner due to the limitation of the amount of playing time during at least six months of the year.

The Braddon Tennis Club is one of the few remaining European clay Court venues in the ACT, and is a vital part of the fabric of tennis in the territory, acting as one of the primary practice venues for the Tennis Australia Junior Claycourt National Championships held annually in Lyneham.

In winter, morning solar access is critical for public recreation, frost mitigation, surface warming, and safety. A 3-6 level building on the eastern boundary eliminates effective winter morning solar access, making the venue unsafe, unplayable and unsustainable.

We request that due consideration be given to the continued viability of the venue as a clay-based tennis facility should approval for the development be granted.

Yours sincerely

Mark la Brooy
Chief Executive Officer
Tennis ACT



EPSDD
ACT Government
29 July 2024

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To Whom it may concern:

Re: Development application for multi-level hotel and spa development in [REDACTED].

Tennis ACT has noted with concern the application for the development of a multi-level hotel and spa on the site adjacent to the Braddon Tennis Club. We support the objection lodged by the Braddon Tennis Club with the extent of the shading of the tennis court areas clearly identified in the shadow diagram provided by the developer.

The Braddon Tennis Club is one of the few remaining European clay Court venues in the ACT, and the shading effect on the courts caused by a multi-level development proposed on the adjacent site is not compatible with the operation of a clay court venue.

The Canberra winter weather means that there is an expectation of frost for the majority of the winter months, and areas that are shaded will remain frozen and then too wet for play to safely occur for the best part of the period between April and the start of October.

We request that due consideration be given to the continued viability of the venue as a clay-based tennis facility should approval for the development be granted.

Yours sincerely

[REDACTED]

Mark la Brooy
Chief Executive Officer
Tennis ACT



03/08/2024

Re: Development Application no. [REDACTED]

To whom it may concern,

I represent the Braddon Tennis Club (BTC / the club) as a player and committee member.

The club engaged with developer Bulum Group during their community consultation of October 2023 and met with representatives of Turco (architect), Bulum (developer), Purdon (engagement consultant) on 12th October. At that time we expressed the concerns that follow. While the club recognises the opportunities the mixed-use development presents as part of the evolution of inner-city northern Canberra, the scale and bulk of the design greatly impact the viability of the club. The development purports to be a centre for health and wellness, but it will come at the detriment of a community-driven centre for health and wellness that already exists.

There is little change between the design submitted during community consultation and the one submitted in the DA. Particularly, there is little change in the degree of shadowing of the tennis courts. The message delivered at community consultation has not been heeded.

The development is not consistent with the theme of Built Form and Building Design and does not respond to urban context. It ignores the specific amenity of its neighbour. Neither the club, nor Tennis ACT support the DA submission in its current form. Please find attached a letter of support from Tennis ACT as part of this representation.

Shadowing

The club strongly opposes the proposed height and bulk of the development, particularly along the boundary shared with the club. Shadowing will have detrimental impact on the club courts. Clay court surface is very sensitive – it requires the sun to dry (and in winter, thaw) overnight moisture. Shadowing would delay the start of play and coaching until the courts were of a sufficient condition resulting in loss of revenue and membership. Shadowing from the current proposal would render two of the four courts unplayable during peak periods. This will be exacerbated when the adjacent land at 20 Farrer St (also owned by Bulum) is developed – the same shadowing issues will arise, this time shadowing the other two of the four courts. The design stepping towards the city centre means shadowing occurs on the courts instead of on the development itself.

It is a Tennis ACT and Crown Lease requirement that the club maintain clay courts and not lay another surface such as synthetic grass or hard court. The club is one of very few in the region to have European style clay, it is used by juniors as a practice venue during competition play at Canberra Tennis Centre. Canberra has a distinguished history of producing talented tennis players from suburban clubs.

Of all surfaces, clay is the most impacted by wet weather, resulting in court closure till the courts dry. Shadowing would increase court closure times.

Regardless of the surface, club members place a premium on the value of sunlight to physical health and mental wellbeing. Shadowing erodes this valuable asset.

Parking

The club anticipates that, during the development's construction, tradespeople will use the club parking lot (and the verge) unauthorised. While Bulum Group have suggested that their neighbouring block at 20 Farrer St will be used for parking, the club poses that the development is so dense that the neighbouring block will be used for materials handling, plant and site amenities and will quickly reach capacity before consideration of sub-contractor vehicles.

The club anticipates that users of the completed development will use the club parking lot (and the verge) unauthorised when the volume of vehicles exceeds the development's onsite parking or the parking is inconvenient (tight basement) or poorly managed. The club does not want to enter into an ongoing adversarial relationship with its neighbours, particularly when the individual offenders will be transient (as will be the case for a commercial / short stay residential development).

Lighting

The design of the development uses the footpath between Farrer and Elder streets as a pedestrian accessway. BTC notes the importance of providing sufficient lighting in this accessway for safety and security. Lighting should not impede court playability (ie shielded at eyeline, not directional at the courts).

Existing Amenity

The club has existed for close to 100 years and has maintained an excellent relationship with its neighbours. Courts are used between 7am and 11pm. A coaching business, run by a local resident, operates out of the club and maintains a strong relationship with the students of Ainslie School.

Recent court lighting upgrades meet light trespass/ spill requirements. The development should be designed and managed to consider existing amenity and have appropriate controls to its south elevation.

Small, local tennis clubs are a signature of inner city Canberra, they are an important, distinctive element of the Capital's garden city design and heritage. The pre-DA advice from the NCDRP emphasised the need to be sensitive to the local community and that the design needs to better align with Braddon's 'place' attributes. The club is not confident that the submitted design has improved upon the pre-DA design.

We trust the EPSDD will consider these issues when granting DA.

Kind regards,

Jessica Bramwell

Braddon Tennis Club Committee

[Redacted signature]

"SUPERIOR" RED POROUS and ARTIFICIAL GRASS TENNIS COURTS

Construction and repairs by

**E. T. RICHARDS & SONS PTY.
LTD.**

ACN: [REDACTED] ABN: [REDACTED]

Suppliers of Brick Dust, Magnesium Chloride

Myles Emery

Braddon Tennis Club.

9.4.26

E.T. Richards originally constructed the clay surface courts at Braddon Tennis Club. The Braddon Tennis Club Committee has recently raised significant concerns regarding a proposed apartment development adjacent to the tennis facility.

Should this development proceed, it may have major implications for the long-term viability of tennis operations at Braddon Tennis Club. The height and proximity of the proposed building are expected to create substantial shadowing across at least Courts 1 and 2. Depending on the extent and duration of this shadowing, it may significantly limit or potentially prevent the effective use of these courts.

Permanent shading is likely to inhibit adequate drying of the clay court surfaces, resulting in courts remaining damp for extended periods. Such conditions promote moss and weed growth and increase surface slipperiness, creating potential safety risks for players. Reduced sunlight exposure would also compromise court maintenance standards, substantially increase ongoing maintenance costs, and negatively affect overall playability.

These impacts may be further exacerbated should the club be required to transition to alternative playing surfaces such as synthetic grass or hard courts, as ongoing moisture retention and reduced natural drying conditions would continue to present significant maintenance, performance, and safety challenges.

[REDACTED]
Telephone: [REDACTED]

Mobile: [REDACTED]
[REDACTED]