



**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: 016

Submitter: North Canberra Community Council committee

Date authorised for publication: 14 May 2026

*Protecting, promoting and enhancing the economic, cultural, social and environmental well-being of the residents of North Canberra*

The North Canberra Community Council receives funding and support from the ACT Government



Thank you for this opportunity for the North Canberra Community Council (NCCC) to make a submission to the Standing Committee on Environment and Planning inquiry on *Draft Major Plan Amendment to the Territory Plan 07 – Former Braddon Bowls Club* (DPA-07).

The NCCC understands the need for densification in the inner North to meet population growth projections and supports well-designed, well-planned development that strives to deliver a mix of housing, including affordable and social housing, that meets community needs and expectations. The NCCC advocates for strong communities and calls for a genuine dialogue between community and government on planning issues.<sup>1</sup> This inquiry is a welcome opportunity for the community and government to come together to explore the most appropriate zoning for an empty block of land located in the heart of a low-rise, family-focused community precinct, that was once a socially active bowling club.

As noted in the media release which announced this inquiry, the public consultation phase of DPA-07 revealed a disconnect between the proponent's view that the Bowls Club site is the ideal location for high-rise apartments; and community concerns about development scale, building heights and the impact of 6 storey high apartment blocks<sup>2</sup> in the very middle of an RZ1 street and adjacent to community spaces in Community Facilities Zones (CFZ – school and childcare centre) and Restricted Access Recreation Zone (PRZ2 – tennis club).

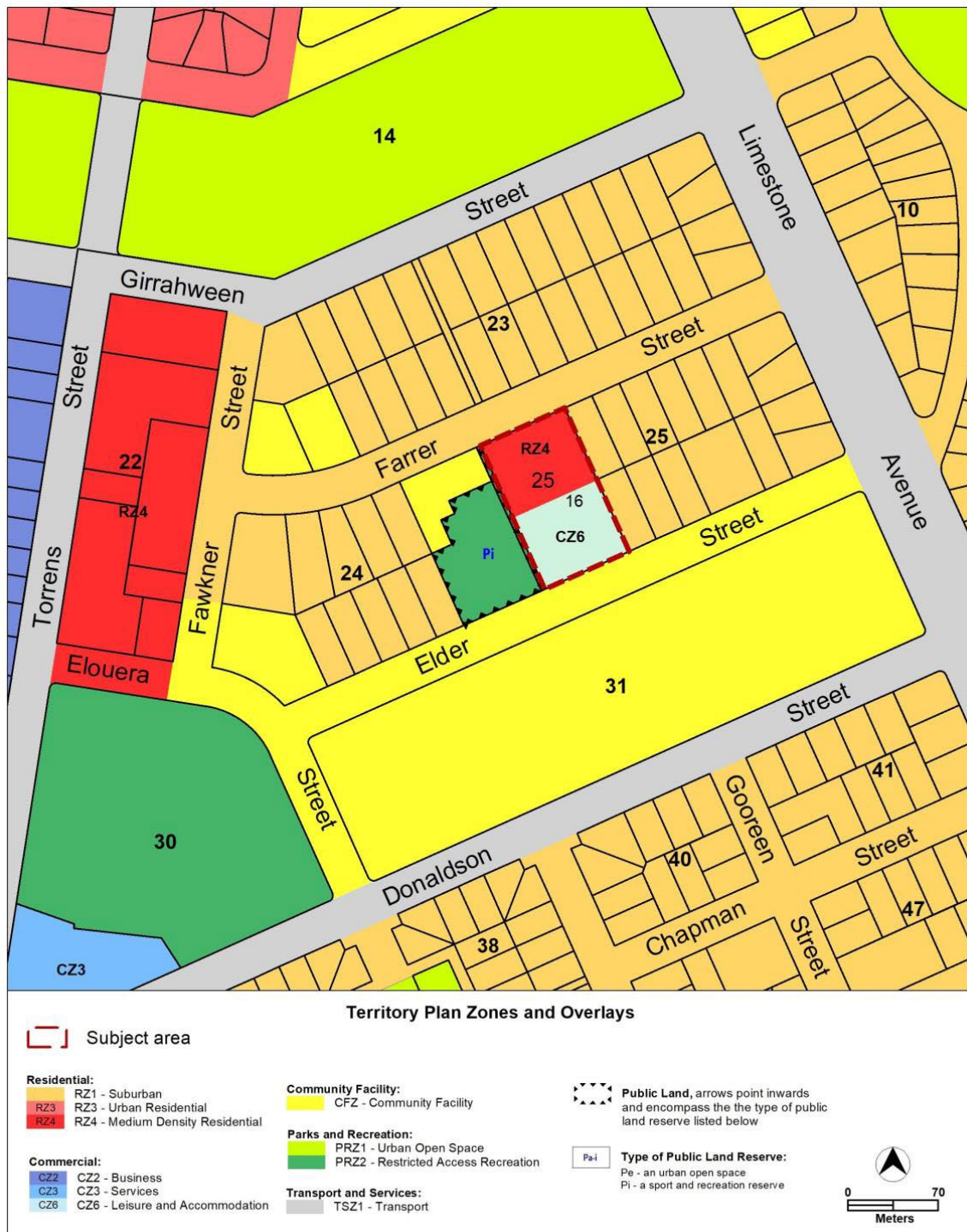
The plan in **Figure 1** below clearly demonstrates the incongruence of the proposed re-zoning in the context of the Elder Street and Farrer Street precinct:

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<sup>1</sup> See NCCC Statement of Principles: <https://www.northcanberra.org.au/about-nccc-2/>.

<sup>2</sup> The proponent has proposed re-zoning from RZ4 and submitted a massing study for 4-storey apartments as envisaged by the **Territory Plan 2023** as at June 2025 when the application for rezoning was submitted.

If *Draft Major Plan Amendment 04 – Missing Middle Housing Reform* is approved and enacted, this will change the building height allowed in RZ4 zoning and enable development of 6 storeys in RZ4 zones. We note that DPA-04 is likely to progress given the recent recommendation of the Planning and Environment Committee (May 2026) that the amendment be approved.



**Figure 1:** Proposed Territory Plan amendment  
Source: DPA-07 Report

We respectfully urge members of the Standing Committee on Environment and Planning to undertake a site visit to be able to fully understand the site-specific context of DPA-07 and how the Bowls Club site sits alongside the adjacent community (CFZ and PRZ2) and residential (RZ1) zoning.

**Recommendation 1:** The NCCC encourages the Standing Committee on Environment and Planning to undertake a site visit to the Bowls Club site to enable their understanding of the streetscape, the community facilities immediately adjacent, existing active travel routes and site proximity to the Ainslie School.

## 1. Background

The history behind this proponent-led proposal to re-zone half of the Bowls Club site (Block 16, Section 25 BRADDON) is complex and spans over a decade – starting when the Ainslie Football Club sold the site to the Bulum Group in 2015 and the Canberra City Bowling Club was evicted in 2018.<sup>3</sup> A timeline of proposals, development applications (DAs) and this major plan amendment is provided at [Attachment A](#).



**Images 1 and 2:** Former Canberra City Bowls Club  
Sources: RiotACT, 2016; Canberra Times, 2018

<sup>3</sup> See <https://region.com.au/what-to-do-not-to-do-with-a-bowling-club/187033/>.



The residents of Elder Street and Farrer Street, the tennis club, school parents and other affected community members, have been required to navigate a raft of proposals for the site since 2015. Over the past 4 years there has been:

- 1 pre-DA community consultation session (for a proposal that was not progressed)
- 4 public consultation periods for DAs that have been submitted<sup>4</sup>
- 1 consultation period for DPA-07
- 1 invitation for a submission to this inquiry into DPA-07.

At least 3 of these consultation periods have overlapped, and each of these consultation periods have required community members to locate, download, read, interpret and make sense of hundreds of documents and provide written representations within the short public consultation timeframes. The various proposals listed in [Attachment A](#) span two iterations of the *Planning Act* and two Territory Plans.

The local community is disenchanted with a planning system that favours developers and sidelines genuine community concerns. The DPA-07 'Recommended to Minister' Report is an excellent example of how arguments put forward by the proponent are adopted by the Territory Planning Authority (TPA) without question (see *Need for the Draft Major Plan Amendment*, Section 3.0, DPA-07 Report, pages 6-10). By contrast, the 22 representations submitted by the community (including one joint local residents' submission) are characterised in the report as being irrelevant or incorrect. The phrase "that will be addressed through the DA process" is seen throughout the responses to community concerns to dismiss and discount the issues raised in the 22 submissions (see *Consultation with the Public*, Section 3.0, DPA-07 Consultation Report, pages 7-10).

Many impacts highlighted in the representations submitted by the community are a consequence of the bulk and scale of the built form that could be progressed if DPA-07 is approved. If DPA-07 is approved so are the impacts of the zoning. It is difficult to understand how these impacts can be addressed in a future DA process if high-density has been greenlighted through the Plan amendment process.

## 2. Inquiry into DPA-07: structure of this NCCC submission

The terms of reference for this inquiry are narrow and confined to the proposed amendment DPA-07. The NCCC submits that the issues that emerge from a consideration of DPA-07 are broader than this request to re-zone half of a block of land located in a quiet residential RZ1 street in Braddon. Accordingly our submission is structured as follows:

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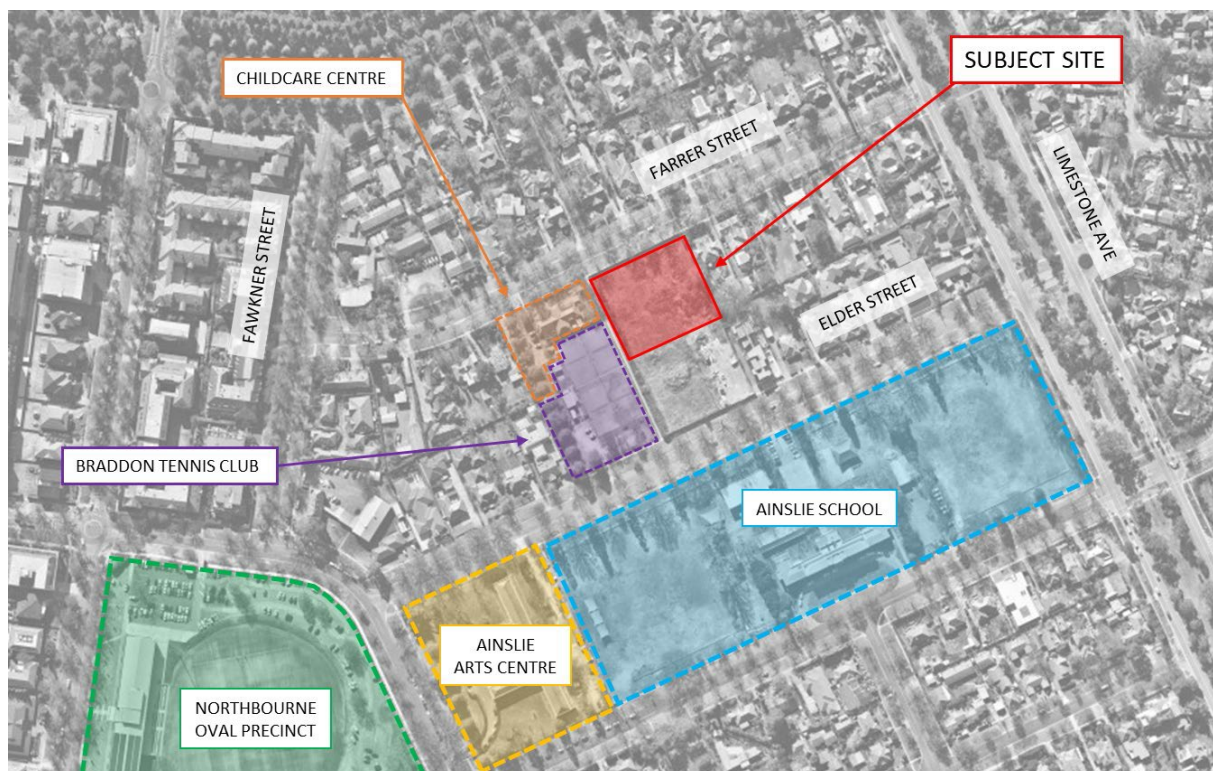
<sup>4</sup> DA 202240160, DA 202240531, DA 202443065 and DA 202443065-S179B.

- **Section 3** of our submission is focussed on DPA-07 as required by the terms of reference.
- **Section 4** highlights broader issues with the planning regime that are outside the scope of the inquiry but we wish to bring to the Committee’s attention whilst considering DPA-07.

### 3. Issues specific to DPA-07

#### 3.1 Fragmented approach to re-zoning

DPA-07 proposes re-zoning the northern half of the Bowls Club site – proposing a change from CZ6 to RZ4 for the Farrer Street section of the site.<sup>5</sup> The section proposed for re-zoning (4234 m<sup>2</sup>) is equivalent in size to 3 house blocks along Farrer Street.



**Figure 2:** Site layout showing sub-division – proposed re-zoning highlighted in red  
Source: DPA-07 Traffic Assessment Report

Good planning requires that the cumulative impacts of all future planned developments are considered together for any assessment, whether it is the assessment of a DA or a major

<sup>5</sup> It is noted that as at May 2026 the subdivision of the block has not yet taken effect – see decision notice for [DA 202240531](#).

plan amendment. Separating the assessment of proposals creates confusion for the community and removes the opportunity to holistically assess impacts.

The community looks to the **District Strategies** to guide future development in Canberra and ensure densification is achieved<sup>6</sup> whilst protecting community space and the existing character of neighbourhoods. Specifically the Inner North and City District Strategy states:

New development in established areas will deliver living infrastructure, contributing towards tree canopy and other targets to bring nature into the city.

[...]

New housing will be focussed on the light rail corridors, with high-quality design outcomes, a mix of tenures including social and affordable housing, and enhanced public areas and open space. Landscape and built form character elements that define established residential areas in the district will have been respected and protected, alongside new development.<sup>7</sup>

The NCCC supports each of these aspirations, as can be seen in the NCCC Statement of Principles.<sup>8</sup> However it seems highly unlikely that re-zoning one half of one block of land through DPA-07 will deliver ‘social and affordable housing, and enhanced public areas and open space’. As the history of the Bowls Club in Section 1 above demonstrates, the sale of a community sporting facility to a private developer has taken away a valued community space and threatens to destroy the remaining community facility at the tennis club (see Public Comment 21 in the DPA-07 Consultation Report). Further, the injection of 6-storey apartment buildings into an RZ1 street very clearly will not respect and protect established residential areas.

DPA-07 seems entirely at odds with the intent of the District Strategies. For example, the Inner North and City District Strategy clearly identifies ‘change areas and key sites’ in the inner North for development. The Bowls Club site **is not identified as a change area** in Category 1, Category 2 or Category 3 (see pages 17, 18 and 19 of the District Strategy). The approach proposed by DPA-07, whereby one block of land - equivalent to 3 house blocks - is re-zoned without reference to the context of the streetscape, community needs and the capacity of existing infrastructure (e.g. roads, schools, active travel routes) is highly flawed.

The NCCC submits that the draft major plan amendment process which facilitates fragmented proponent-led rezoning proposals does not uphold the intent of the District Strategies and will not deliver high-quality design outcomes, a mix of tenures including social and affordable housing, and enhanced public areas and open space.

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<sup>6</sup> See page 3 of the ACT Government *Statement of Planning Priorities 2024-25*: “The major challenge and priority for the Government in meeting this growth is the supply of new housing. The new District Strategies have identified areas for change within the existing urban footprint ...”

<sup>7</sup> Inner North and District Strategy 2023, page 13.

<sup>8</sup> See NCCC Statement of Principles: <https://www.northcanberra.org.au/about-nccc-2/>.

The NCCC notes the recent release of the report of Missing Middle Housing Reform inquiry into DPA-04 and Recommendation 15 which recommends District Strategies are amended to include statements on local/neighbourhood/streetscape character to establish the context for densification in RZ1 and RZ2 zones. The NCCC supports this recommendation and would encourage the TPA to consider the inner North, and specifically this part of Braddon, as an ideal location for this work to be piloted.

### **3.2 Lack of justification in DPA-07 for rezoning to RZ4**

The community concerns expressed through submissions during the public consultation period, and at a recent well-attended public meeting at the Ainslie School, make clear that both a 4 storey limit and a 6 storey limit are inappropriate for the Bowls Club site given that all surrounding residential buildings are limited to 2 storeys. The RZ1 height limit would be the most logical if residential zoning is considered by the TPA to be the most appropriate use of the site.

An alternative is for DPA-07 to **not be approved** and the site retain the current CZ6 zoning with the lease conditions for a childcare centre and bowling club. This approach would provide valuable open space and community facilities accessible to all. Throughout the entire DPA-07 process there has been no recognition of the value of community spaces.

If *Draft Major Plan Amendment 04 – Missing Middle Housing Reform* (DPA-04) is approved and enacted<sup>9</sup> the RZ4 zoning proposed in DPA-07 would allow development of up to 6 storeys on the site. The DPA-07 supporting report, traffic impact assessment and massing study, have been prepared in the context of the current RZ4 zone requirements (limited to 4 storey buildings). Allowing DPA-07 to proceed before the new Missing Middle zones come into effect does not enable a full assessment of the impact of rezoning this site to RZ4.

### **3.3 Impact of DA 202443065 – hotel proposal on the Bowls Club site**

The development proposal for the Elder Street half of the block (CZ6 zoning) is still under assessment (see DA 202443065). The DA is for a 6 storey hotel, wellness centre, restaurants, function room and rooftop bar.

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<sup>9</sup> We note that DPA-04 is likely to progress given the recent recommendation of the Planning and Environment Committee (May 2026) that the amendment be approved.





**Figure 3:** Hotel proposal for the southern half of the Bowls Club site  
Source: DA202443065 – Composite street elevation

Representations made in response to **DA 202443065** and the 2<sup>nd</sup> stage notification **DA 202443065-S179B** demonstrate the widespread community opposition to this proposal for a 6 storey hotel and entertainment complex. The representations clearly show that the numerous plans for the site over the past decade are causing considerable community distress. A summary of the representations received is at [Attachment B](#).

As noted above, good planning requires that the cumulative impacts of all future planned developments are considered together, and we submit that the current situation whereby DA 202443065 and DPA-07 are running concurrently (and are assessed by different areas of the Planning arm of the City and Environment Directorate (CED)) does not lead to robust future-focused planning decisions being made.

### **3.4 Intersection between DPA-07 and section 186 of the *Planning Act 2023***

The issues raised by the community through public consultation period are summarised in the DPA-07 Consultation Report (see pages 7-10). The TPA response to these comments are primarily focussed on the DA process being the time to address community concerns.

When making a decision on a DA, subsection 186(d) of the *Planning Act 2023* requires a decision maker to consider ‘whether the development proposal achieves an appropriate transition between the zones’. If DPA-07 was implemented and DPA-04 is also implemented, it would be open to the proponent to submit a DA for a 6 storey residential apartment block on the site. As the site is located in an RZ1 street this development proposal could never provide ‘an appropriate transition within zones’. Effectively, re-zoning of this site to RZ4 creates unintended consequences for a decision-maker considering any future DA for residential units on the site. It is inevitable that the Bulum Group will propose residential apartments that are for the maximum 6 storeys allowed – how can such a proposal meet the requirement of subsection 186(d) of the *Planning Act*?

The NCCC submits that the proposed major plan amendment should fully consider the transition between zones along Farrer Street and the most appropriate zoning should be determined to facilitate a transition within the streetscape once a DA is submitted. We urge

the Committee to consider the community concerns raised in response to the hotel proposal on the Elder Street half of the block (see [Attachment B](#)). These same concerns (amenity, impact on streetscape, traffic impacts) will arise for any proposal for 6 storey apartments. The considerable distress caused to the community cannot be underestimated as is evidenced by a recent community meeting held at the Ainslie School attended by 40 residents, parents and community members.

**Recommendation 2:** That the Planning and Environment Committee calls for a review of the draft major plan amendment process to investigate whether proponent-led rezoning proposals are delivering high-quality design outcomes, a mix of tenures including social and affordable housing, and enhanced public areas and open space.

**Recommendation 3:** That the TPA pilots the implementation of Recommendation 15 in the DPA-04 inquiry report and develops statements on local/neighbourhood/streetscape character to establish the context for densification in RZ1 and RZ2 zones. The part of Braddon that encompasses Elder Street and Farrer Street is an ideal location for this pilot.

**Recommendation 4(a):** That the Planning and Environment Committee recommends to the Minister that DPA-07 not be approved given the lack of justification to reduce the amount of land available for community use in the immediate area and to recognise the opposition of the community to the rezoning.

**Recommendation 4(b):** In the alternate, if DPA-07 continues to be progressed, that the Planning and Environment Committee requires the TPA to fully consider the transition between zones along Farrer Street and fully assess the most appropriate zoning for the site that would facilitate a transition within this RZ1/PRZ2/CFZ precinct. This in turn would ensure any DA submitted for the site could be assessed and meet the requirements of subsection 186(d) of the *Planning Act 2023* for an appropriate transition between zones.

#### 4. Broader issues that emerge from DPA-07

This inquiry is an opportunity for the Standing Committee on Environment and Planning to look beyond the draft major plan amendment as provided to the Minister and consider a number of broader issues that emerge from a consideration of DPA-07.

##### 4.1 Navigating the planning system: Limited options to ask questions

The planning system is complex and requires technical knowledge that is beyond the understanding of the majority of community members. Information on the ACT Government website is limited and is aimed at professionals and not community members seeking to understand the planning system.

There is a 'Planning system hotline' phone number on the [TPA webpage](#) but it is the experience of NCCC members that this line is never answered and simply rings out. Advertising a phone number that is not answered represents poor stakeholder management and should be remedied. The alternative to a phone call is the online contact form. It is the experience of NCCC members that responses to queries through this form are actioned quickly, however, the responses received are one-line high-level answers that inevitably require follow-up questions, and finding someone to answer these follow-up questions is difficult.

The NCCC urges the ACT Government to consider establishing contact officers within TPA and/or within the City and Environment Directorate that are available to answer questions from community members and have a role in providing advice to the public on planning issues. These roles could be supported by a suite of plain English materials that provide information that can assist the community understand issues that frequently arise. The Community Councils across the ACT would be well-placed to advise on the questions that the community has about planning that could be addressed in plain English resources.

#### **4.2 Loss of community facilities across Canberra**

Community spaces are essential to the social cohesion, wellbeing, and liveability of residential areas. Facilities such as schools, childcare centres, sporting and recreational venues, community halls, and green spaces provide critical infrastructure that supports both current and future populations.

There is an increasing trend towards the loss of these spaces through their sale and redevelopment for residential and commercial purposes – the sale of the Bowls Club site to the Bulum Group is a perfect example. Additional recent examples are the closure and proposed re-development of Big Splash, the loss of the Phillip Pool and the re-zoning of the Ainslie Football Club site to allow development on community zoned land. This is occurring despite population growth projections and a planning emphasis on urban infill, both of which will increase demand for accessible community infrastructure. The reduction of community-use land under these conditions is inconsistent with sound strategic planning and risks undermining community wellbeing.

Current planning frameworks appear to provide limited mechanisms to prevent the rezoning of community-use sites once they become commercially attractive. As a result, market-driven redevelopment is leading to the incremental erosion of these shared assets. A more deliberate policy approach is required to recognise the long-term public value of community and sporting facilities and to ensure their protection and retention. Without such measures,

the continued loss of these sites will have lasting negative impacts on community cohesion and access to essential services.

The NCCC urges the ACT Government to strengthen protections for land zoned for community and sporting use under the Territory Plan and the *Planning Act 2023*. We make the following suggestions for the consideration of CED:

- Amending the Territory Plan to introduce stronger controls on the rezoning or variation of PRZ, CFZ and CZ6 land, including a presumption against change of use unless it can be robustly demonstrated that the site is surplus to current and projected community needs, consistent with ACT population growth and infill strategies.
- Requiring independent, transparent community needs assessments and public interest tests as part of any proposal to vary the Territory Plan for PRZ, CFZ and CZ6 land, with oversight by the TPA.
- Strengthening provisions in the *Planning Act 2023* to ensure that social and community infrastructure planning is integrated with land release and infill policies.
- Auditing existing PRZ, CFZ and CZ6 land across Canberra and then establishing a long-term strategy for community facilities land to guide decision-making, ensure transparency, and align infrastructure provision with projected population growth.

**Recommendation 5:** Ensure the ‘Planning system hotline’ phone number is a number that is answered or diverted to another phone that is answered (i.e. divert to the Access Canberra general number or similar).

**Recommendation 6:** That the ACT Government consider establishing contact officers that are trained to answer general questions from the community about the planning regime. Contact officers should also be able to refer community questions and concerns to the appropriate areas of CED to inform recommendations to decision-makers.

These roles could be supported by a suite of plain English materials that provide information that can assist the community understand issues that frequently arise.

**Recommendation 7:** That the ACT Government consider an inquiry into the loss of community zoned land and sporting facilities across the ACT, and investigate ways to strengthen protections for land zoned for community and sporting use through the Territory Plan and the *Planning Act 2023*.

## Conclusion

The NCCC is of the view that DPA-07 is a litmus test for the new Territory Plan and supporting planning framework. It is essential that the principles of good planning are upheld. The major plan amendment process must consider whether the Bowls Club site is identified as a change area in the District Strategy; take account of the urgent need to protect community spaces and ultimately take a holistic view of the impact of the amendment which, if approved, will pave the way for 6-storey apartments in a low-rise setting.

Further, DPA-07 is a test of whether the new planning regime can facilitate the participation of the local community who are directly affected by proposals for the site. It is time for the ACT Government to intervene and end the decade of uncertainty for the community. It is time to recognise and respect what the community wants their neighbourhood to be.

Ian Hubbard  
Chair  
North Canberra Community Council



**8 May 2026**



**TIMELINE**

Former Braddon Bowls Club Block 16 Section 25 BRADDON

**Key:**

DA process - not yet taken effect

DA process – under assessment

Draft major plan amendment – not yet decided

|                  |                                                                                                                                                                                                                                                                              |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1928             | Canberra City Bowling Club established                                                                                                                                                                                                                                       |
| 2001             | Ainslie Football Club (AFC) amalgamates with Canberra City Bowling Club                                                                                                                                                                                                      |
| 2015             | AFC proposal to move bowling club to Gungahlin Lakes falls through (move did not eventuate)<br>AFC evict the Canberra City Bowling Club and sell the site to property developers Bulum Group (\$3.8 million)                                                                 |
| 2018             | City Bowls Club closed to members                                                                                                                                                                                                                                            |
| 2020             | City Bowls Club house and bowling rinks demolished                                                                                                                                                                                                                           |
| 19 April 2022    | Lease Variation Charge Exemption letter due to childcare use sent                                                                                                                                                                                                            |
| 23 May 2022      | Lease Variation to change the Crown Lease to add childcare centre as a permissible use.<br>DA 202240160                                                                                                                                                                      |
| 8 August 2022    | Proposal for a new signs and a lease variation for a subdivision of the block.<br>DA 202240531                                                                                                                                                                               |
| 20 August 2022   | Lease variation for addition of childcare centre conditionally approved.<br>DA 202240160                                                                                                                                                                                     |
| 29 November 2022 | Conditional approval for signage and subdivision<br><b>Note: subdivision not yet taken effect as at May 2026.</b><br>DA 202240531                                                                                                                                            |
| 14 December 2022 | Pre-DA consultation held online for proposal to submit a DA for commercial accommodation on the Farrer Street half of the block<br>78 Serviced Apartments over 4 storeys with 2 levels of basement car parking<br>(proposal was not submitted as a DA)                       |
| 2 July 2024      | Proposal lodged for a commercial development and lease variation on Elder Street side of the block.<br><b>DA 202443065</b><br>Proposal for two 3 to 6 storey buildings comprising a hotel, commercial accommodation, restaurant, bar, function centre, café, pool and shops. |

|                  |                                                                                                                                                                                                                                                                         |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9 July 2024      | Stage 1 consultation on DA 202443065 commenced, ending 12 August 2024                                                                                                                                                                                                   |
| 14 August 2024   | Assessment of DA 202443065 suspended when the Request for Further Information (RFI) sent to proponent.                                                                                                                                                                  |
| 21 November 2025 | <b>DPA-07</b> public consultation period commenced. Period for comments closed 23 January 2026.<br>Proposal to seek a lease variation for medium density RZ4 on the Farrer St frontage of the City Bowls Club rezoning the site from CZ6 Leisure and Accommodation.     |
| 13 January 2026  | 2 <sup>nd</sup> stage notification<br>Response received from developer to address issues document in the RFI from TPA including summaries of issues raised by the TPA and Government entities, NCDC and representations from the community<br><b>DA 202443065-S179B</b> |
| 26 March 2026    | Stage 2 consultation on developer's response to issues commenced, ending 10 April 2026<br><b>DA not yet decided</b>                                                                                                                                                     |
| 9 April 2026     | Standing Committee on Environment and Planning announces inquiry into DPA-07.<br>Submissions due 8 May 2026.                                                                                                                                                            |

# Summary of Community Concerns – DA202443065 and DA202443065-S179B

## Overview

Community submissions demonstrate **strong and consistent opposition** to the proposed hotel and mixed-use development at Block 16 Section 25, BRADDON. Concerns are wide-ranging but highly aligned, with recurring themes relating to **scale, amenity impacts, safety, planning compliance, and loss of community character**. 79 representations received in total.

While the proponent's amended submission (DA202443065-S179B) indicates **reductions in bulk and design refinements**, these changes are minor and do not address the **core concerns raised by residents, community members and stakeholders**.

## 1. Incompatibility with Residential Character

The most dominant concern is that the proposal is **fundamentally inconsistent with the surrounding low-density residential area**.

- The development (up to 6 storeys) is widely described as **excessive in height, bulk and density** compared to predominantly single-storey dwellings.
- Residents argue the proposal is **"incongruous" and "out of keeping"** with the established garden suburb character of the precinct.
- The architectural design is considered **visually intrusive and unsympathetic**, particularly in proximity to heritage sites such as Ainslie Primary School and Ainslie Arts Centre.

### Key issue:

The development is seen as a **commercial-scale project inserted into a residential precinct**, rather than a contextual evolution of the area.

## 2. Traffic, Access and Safety Impacts

Traffic impacts are one of the most frequently cited concerns, particularly due to the site's proximity to a primary school and childcare centre.

- Submissions consistently warn of **significant increases in traffic volume**, including hotel patrons, service vehicles, and through-traffic using the service lane as a rat-run.
- Existing congestion—especially at **school drop-off and pick-up times**—is already **problematic** and expected to worsen.

- Increased traffic is seen as posing a **direct safety risk to children**, pedestrians, and vulnerable road users.

Specific concerns include:

- Intersection pressure (e.g. Limestone Avenue access)
- Narrow residential streets becoming unsafe
- Proposed laneway encouraging **rat-running and additional vehicle movement**

**Key issue:**

The transport impacts are viewed as **underestimated in technical reports and incompatible with the surrounding uses**.

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### 3. Noise, Disturbance and Amenity Loss

Residents strongly object to the **anticipated noise and disruption**, both during construction and operation.

- The hotel, bar, restaurant and event spaces are expected to generate **continuous noise, including late-night activity**.
- Concerns extend to:
  - No noise assessment provided for the impact of a rooftop bar
  - Inability to obtain a liquor licence in a location adjacent to a school
  - Service and delivery noise
  - Increased pedestrian activity and noise from bars, function centre and restaurant at all hours
- Construction impacts (excavation, trucks, dust) are also highlighted as **significant and prolonged**.

**Key issue:**

The development is seen as incompatible with residents' **right to quiet enjoyment** and existing residential amenity.

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### 4. Impacts on Schools, Childcare and Community Facilities

The proximity to **Ainslie Primary School, childcare centres, and community facilities** is a major and consistent concern.

- Increased traffic and activity are seen as **endangering children and disrupting school operations**.
- Noise and overlooking are expected to:
  - Disrupt childcare activities and sleep routines
  - Reduce privacy and outdoor usability
- Broader community facilities (churches, arts centres, tennis club, aged care facilities) are also expected to be negatively impacted.

**Key issue:**

The proposal is viewed as **inappropriate adjacent to sensitive community uses**, particularly those involving children and the elderly.

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## 5. Planning and Zoning Concerns

Many submissions raise **serious concerns about compliance with the ACT planning framework**, particularly CZ6 zoning.

- The proposal is seen as **contrary to CZ6 objectives**, especially:
  - Compatibility with surrounding residential zoning
  - Protection of residential amenity (noise, traffic, privacy)
- Residents argue the development:
  - Functions more like a **CZ5 mixed-use zone outcome without rezoning**
  - Risks setting a **precedent for similar developments across CZ6 areas**
- There is also concern about:
  - **Fragmented assessment** (considering only part of the site)
  - Lack of a **coherent master plan** for the entire block

**Key issue:**

The application is seen as a **test case that could undermine the integrity of the Territory Plan**.

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## 6. Loss of Green Space and Environmental Impacts

The site's previous use as a bowling club is frequently referenced as an **important community green space**.

- The development would replace open space with **dense built form**, with limited greenery and mature tree canopy.
- Overshadowing from the development will adversely affect the adjacent clay tennis courts which will ultimately lead to the closure of the Braddon Tennis Club.
- Concerns include:
  - Removal or damage to existing **mature street trees**
  - Insufficient landscaping and deep soil zones
  - Reduced opportunities for community recreation
- Some submissions highlight inconsistency with **urban forest and greening policies**.

**Key issue:**

The proposal is viewed as a **net loss of environmental and community green infrastructure**.

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## 7. Cumulative and Precedent Impacts

Residents are concerned about **long-term implications beyond this single proposal**.

- The development may:
  - Trigger broader transformation of the area into a **mixed-use precinct without strategic planning**
- There is strong concern about **piecemeal decision-making** rather than coordinated planning.

### **Key issue:**

The proposal is seen as creating **piecemeal decision-making and undesirable cumulative impacts**.

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## 8. Consultation and Process Concerns

A number of submissions raise procedural issues:

- **Insufficient consultation** with residents and key stakeholders
- **Short consultation periods** that align within holiday periods
- Perception that community feedback has not been meaningfully incorporated

### **Key issue:**

The process is viewed as **inadequate for a development of this scale and impact**.

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## Conclusion

Across both documents, community concerns are **highly consistent, strongly expressed, and focused on core planning principles**:

- Protection of residential amenity
- Compatibility with existing character
- Safety of vulnerable users
- Integrity of planning controls
- Preservation of community and environmental assets

While the proponent has introduced design refinements and technical responses to entity concerns through DA202443065-S179B, the evidence indicates these do not resolve the **fundamental conflict between the proposed development and its context**. Further, **DA202443065-S179B did not address any community concerns raised in earlier representations**.

**Source:** Representations submitted in relation to **DA202443065 and DA202443065-S179B**

<https://www.planning.act.gov.au/applications-and-assessments/development-applications/browse-das/development-application-details?da-number=202443065&amendment-version=S179B> – AI generated summary of representations submitted.