



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: 025

Submitter: Ainslie School Parents and Citizens Association

Date authorised for publication: 14 May 2026



8 May 2026

Response to Inquiry into DPA-07 - Former Braddon Bowls Club from Ainslie School P&C

As the elected office bearers and committee members of the Ainslie School Parents and Citizens Association (Ainslie P&C) we submit the following submission to the “Inquiry into DPA-07 - Former Braddon Bowls Club”

We have previously provided representations to both iterations of the Development Application DA202443065 for Block 16, Section 25, Braddon (21 Elder Street, Braddon). Which we have included under Appendix B below.

The following represents a cross section of relevant concerns to this DPA raised by the P&C and broader Ainslie School community.

Child Privacy & Safety

The intended through road to be built connecting Farrer and Elder St should not be permitted under this Major Plan Amendment

By connecting both Elder and Farrer Streets via the proposed new road under this rezoning (see Appendix A – highlighted in red), the development will create a direct through-route that is will encourage “rat running” by residents of the northern block as well as other motorists seeking to avoid congestion on surrounding roads. The proposed connection would channel additional traffic directly into Elder Street, with the new intersection positioned opposite the existing Ainslie School staff parking and designated disabled student and family parking areas. Elder Street is already operating under considerable pressure from a combination of local residential traffic, commuter movements and significant school-related drop-off and pick-up activity. Introducing a new traffic corridor at this location will further intensify congestion, increase vehicle conflict points and compromise the safety and amenity of the area. This is of particular concern for the many children and families who walk, ride or cross Elder Street each day at this same location to access the school, creating heightened risks for vulnerable road users during peak school periods.

Recommendation 1:

If the Standing Committee on Environment and Planning or Planning Minister continues with this Draft Plan Amendment the Ainslie P&C requests that a Site specific provision be added to prevent a through road between the northern block related to this rezoning and southern block under DA202443065. By allowing these two blocks to stand alone it will require both the North and Southern blocks to be designed to meet the unique needs on both the Farrer and Elder St sides of these blocks and avoid any opportunity for rat-running and putting further risk to vulnerable users in the school community.

The active pedestrian travel routes to the west of the DPA block should remain physically separated from any Development on this site.

The pedestrian laneway (see Appendix A - highlighted in purple) currently is physically separated with a solid and continuous colorbond fence approximately 2.1m high. This fencing provides privacy and safety for pedestrian users, particularly young children, from the block subject to this zoning.

It is unclear from the intended design contained in the “DPA07 Massing Study” if the development intends to have direct access to this laneway or not.

Recommendation 2:

If the Standing Committee on Environment and Planning or Planning Minister continues with this Draft Plan Amendment, the Ainslie P&C requests that a Site specific provision be added to preserve the existing solid and continuous fencing to the west of this site.

Any development on this site must preserve, protect and prioritise safe and continuous access to the existing active travel routes and laneways surrounding the block.

These pedestrian connections are not incidental pathways; they are heavily used, established access routes relied upon daily by Ainslie School children, families and community members travelling to and from the school on foot, by scooter and by bicycle. They provide a critical alternative to busy surrounding roads and are an important part of the school’s safe access network.

The active travel routes to the north and west of the site are particularly significant as they enable children and families to move through the area safely while minimising exposure to vehicle traffic and congested pick-up and drop-off zones. Any reduction, diversion, narrowing or interruption of these pathways would undermine pedestrian safety and discourage active travel to school, contrary to broader community safety and sustainability objectives. Despite this, the “DPA07 Supporting Report” fails to meaningfully acknowledge the importance of these routes or assess the impacts the proposed rezoning and future development may have on vulnerable users, particularly young children.

Recommendation 3:

If any development on this site is to proceed, the retention of these laneways and active travel routes, with continuous, safe and publicly accessible pedestrian passage at all times, must be treated as a non-negotiable requirement. Any future design should demonstrably prioritise child and pedestrian safety and ensure these critical connections are protected and enhanced for ongoing use by the Ainslie School community.

General feedback on the Development approach taken

Lack of community engagement by the developer

The Ainslie P&C finds it deeply concerning that, across multiple development applications, lease variations and now the proposed rezoning over many years, the developer has failed to engage with the local school community. Ainslie School has been an established part of the neighbourhood for almost 100 years and will celebrate its centenary in 2027. The school's long-standing presence, along with the associated traffic, pedestrian activity and child safety considerations, were well known and clearly evident long before the developer purchased the site in 2015. As such, the potential impacts on student safety, school access and surrounding traffic conditions should have been identified and responsibly addressed from the outset of the development planning process.

A genuinely community-minded developer, as suggested in the "DPA07 Supporting Report", would proactively engage with the school community to present and discuss its vision, seek meaningful feedback and adapt the design to ensure it appropriately considers the needs and safety of vulnerable children and their families. However, the current rezoning proposal and supporting "DPA07 Massing Study" provide little evidence that these considerations have been acknowledged or meaningfully incorporated into the planning and design process.

We have already seen a complete disregard for our feedback and concerns during the two-part Development Application DA202443065 on the southern part of this block. We want to believe that the many omissions in this development application and now this rezoning application stem from an honest misunderstanding of the use of the area and show no awareness of the impact of pedestrian and child safety - the rat run connection from Farrer to Elder St intended is an example of this. We are finding it hard to maintain a view of ignorance by the developer given the ongoing feedback submitted to the contrary.

Recommendation 4: The Ainslie P&C recommends that the ACT Legislative Assembly amend the Planning Act 2023 to reinstate meaningful and demonstrable community engagement by proponents of future Draft Plan Amendments to avoid the situation we describe above.

Complex interdependency between this DPA on the northern block and the outstanding Development Applications on the southern block

The Ainslie P&C has already provided representations objecting to Development Application DA202443065 on the block to the south of the DPA as per Appendix B below. This matter has been ongoing since 02/07/2024 and is still outstanding for a decision as of 07/05/2026 - 22 months later and a second revision to that DA. The representations of both iterations of the DA do not contain any supporting feedback from the community. The Ainslie P&C expects that the myriad of issues in that DA to adequately address the CZ6 zoning assessment outcomes for: urban structure and native systems; site and land use; built form and building design; access and movement; and sustainability and environment with the significant concerns and issues directly relevant to the school's functioning, safety and wellbeing of students ultimately will lead to the ultimate rejection or significant amendment by the Territory Planning Authority or the developer.

This DPA to rezone this northern block is presented as dependent with the assumption of a positive outcome of the rezoning of the southern site - such as access to the "rat run" road between Farrer and Elder St across both blocks. There are no alternative options presented in the "DPA07 Supporting Report" or "DPA07 Massing Study" if the DA of the southern site is rejected or significantly amended. The design for the rezoned land would need to be revised heavily if the intended vehicle road (see Appendix A - highlighted in red) is not built on the southern site - a road to nowhere in the northern block would make no sense. Is rezoning to an RZ4 block still viable without the southern block as intended in DA202443065? There are no alternatives as presented in this DPA.

Recommendation 5: Any decision to proceed with DPA-07 by the Standing Committee on Environment and Planning or Planning Minister should remain on hold subject to the outcome of DA202443065. A further review by all parties consulted on DPA-07 including ACT Government entities with further community consultation should be undertaken in light of the outcome and any changes introduced with the conclusion of DA202443065.

General feedback on the Draft Plan Amendment process

Lack of Physical Signage related to Draft Plan Amendments

Unlike Development Applications there is no physical signage requirement for Draft plan amendments. Despite the ongoing and regular use of the active travel pedestrian laneway to the west of this block, members of our school community have had no awareness of this rezoning application and their opportunity to provide feedback. They have expressed significant frustration that they were unable to respond in the public consultation period after finding out about it after the fact.

Recommendation 6: The Ainslie P&C recommends the ACT Legislative Assembly to amend the Planning Act 2023 to require physical signage associated with the Draft Plan Amendments to better engage with members of the community.

Our request to the ACT Government and Planning Minister if this rezoning proceeds:

If this rezoning is ultimately approved by the Minister and the ACT Legislative Assembly in the form currently proposed by the developer, it will represent a substantial and inappropriate intensification of residential zoning that is fundamentally out of character with the surrounding RZ1 streetscape and existing school environment. Critically, the proposal is reliant on the creation of a new through-road connection between Elder and Farrer Streets that will inevitably function as a “rat run”, funnelling additional traffic directly past the primary pedestrian access points used daily by Ainslie School children and their families.

The Ainslie P&C strongly maintains that child safety must be treated as the overriding priority in any future planning decisions relating to this site. The existing laneway and active travel network surrounding the school is an essential piece of community infrastructure that enables children to safely walk, ride and travel independently to school while reducing exposure to vehicle conflict points and congested traffic areas. These laneways must be retained, protected and enhanced; not compromised by increased traffic volumes or poor planning outcomes associated with this development.

Should the ACT Government choose to proceed with the rezoning under DPA-07 despite these concerns, it must also accept responsibility for addressing the significant additional safety risks that will be imposed on vulnerable road users, particularly young children. The current pedestrian environment and school access arrangements are already under pressure and are increasingly unfit for purpose. Any increase in traffic associated with this development will only exacerbate these existing safety issues unless substantial intervention occurs.

Recommendation 7: The Ainslie P&C expects the ACT Government to commit to, at minimum, the following child safety and active travel improvements as mandatory conditions associated with any future development of this site:

- Retention and protection of the existing pedestrian laneway and active travel network surrounding the school, with continuous and publicly accessible pedestrian passage at all times irrespective of construction activities
- Comprehensive traffic calming measures on both Elder and Farrer Streets to reduce vehicle speeds and discourage rat running
- Permanent 40km/h speed limits on Elder and Farrer Streets, recognising their function as key school access routes with high child pedestrian activity
- Raised wombat crossings linking the pedestrian laneways and active travel routes across Farrer Street
- Signalised and illuminated pedestrian crossings on Elder Street connecting the active travel laneway directly to the school side of the street
- Heritage appropriate fencing erected on the Ainslie School side on Elder st to funnel vulnerable road users to the appropriate safe crossing options
- Additional best-practice safety treatments for children and vulnerable pedestrians, including measures designed to prioritise walking, cycling and safe school access over vehicle throughput

The safety of children accessing a 100-year-old primary school must not become secondary to development outcomes or traffic convenience. Any planning approval that increases traffic impacts in this location must be matched by meaningful, enforceable and long-term investment in pedestrian safety infrastructure.

We would also strongly urge that this process include a comprehensive, urgent review and remediation of existing child safety and pedestrian access risks on the Limestone Avenue and Donaldson Street frontages of the school. These are critical and heavily used access points for students and families, and any increase in surrounding traffic pressure will compound existing safety concerns across the broader school precinct. A coordinated, whole-of-site approach is essential to ensure all entry points to Ainslie School are safe, accessible, and appropriately protected for children now and into the future.

Conclusion

The Ainslie P&C expects that for any development adjacent to our long-established primary school must, as a fundamental planning requirement, appropriately prioritise child safety, active travel, pedestrian accessibility, community wellbeing, genuine and early consultation with affected stakeholders, and context-sensitive design outcomes that reflect the lived reality of a school environment.

Ainslie School has served this community for nearly 100 years, and its surrounding streets, laneways and access routes are integral to the daily movement of children and families. Against this context, the current DPA-07 documentation does not adequately demonstrate that these critical safety and access outcomes have been properly considered, assessed, or resolved.

The Ainslie P&C respectfully requests that the Standing Committee on Environment and Planning and the Planning Minister give substantial and decisive weight to the concerns raised in this submission prior to any determination regarding DPA-07, with child safety treated as the primary and non-negotiable consideration in any planning outcome.

Signed,

Ainslie School Parents and Citizens Association

Ainslie School

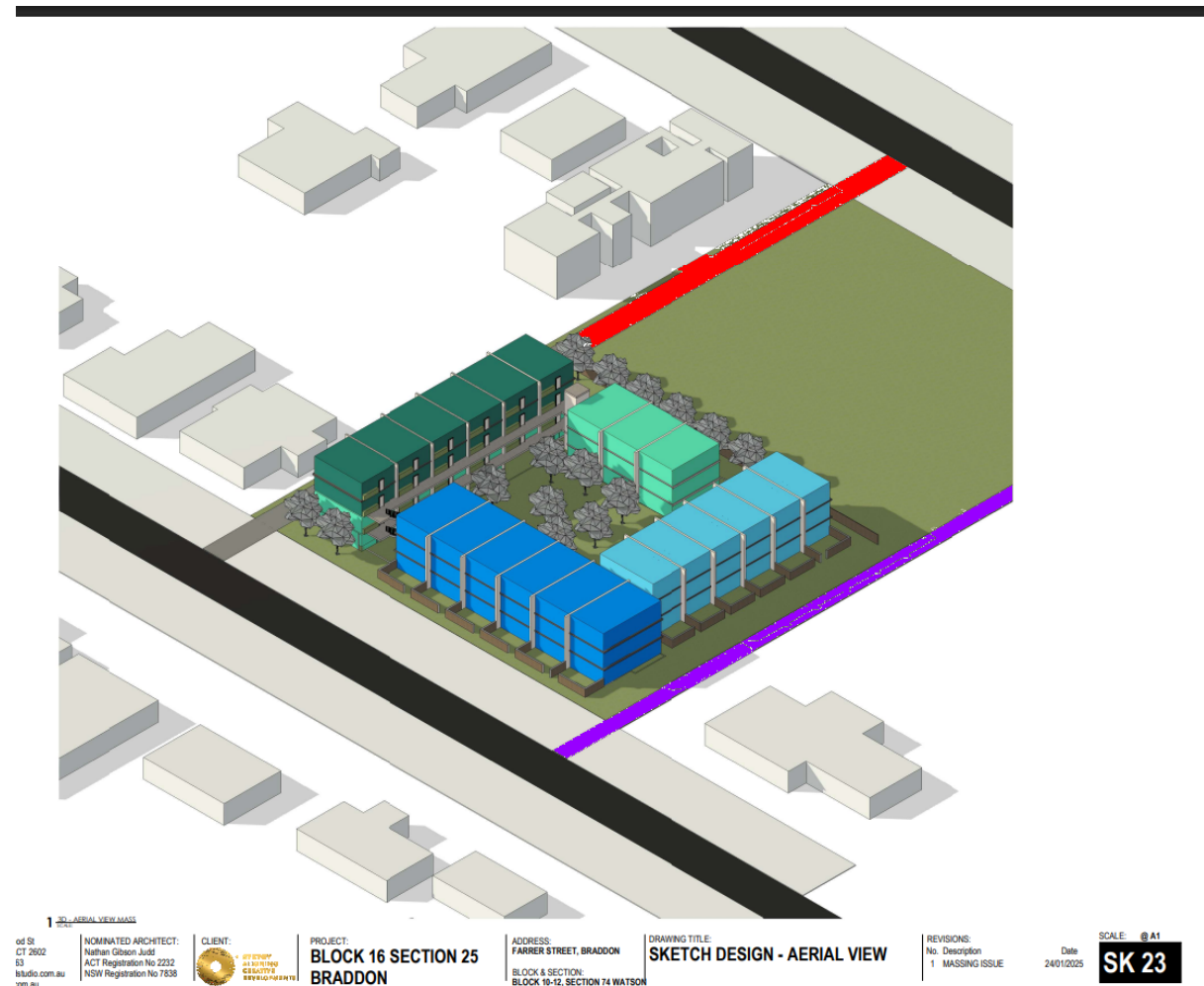
Donaldson Street, Braddon ACT 2602

[Redacted signature]

Appendix A: The rezoning “DPA07 Massing Study”

Page 6 / SK23

Note: the red vehicle road and purple pedestrian laneway highlighting has been added for our emphasis and reference.



Appendix B: Ainslie School P&C Representations to Development Application DA202443065 for Block 16, Section 25, Braddon (21 Elder Street, Braddon).

See following pages.

10 April 2026

**Follow-up Representation – Development Application DA202443065; Block 16 Section 25
Braddon – 21 Elder Street, Braddon; Stage 2 (s179B) Notification**

On behalf of the Ainslie School Parents and Citizens Association (Ainslie P&C), we make this follow-up representation in relation to Development Application DA202443065, in response to the updated Stage 2 (s179B) notification documentation currently on public exhibition.

This representation should be read in conjunction with our original representation dated 11 August 2024, in which the Ainslie P&C lodged a formal objection to the proposed development (see original at Appendix A). That submission detailed significant concerns regarding the proposal's failure to adequately address the relevant CZ6 assessment outcomes, particularly in relation to urban structure and native systems; site and land use; access and movement; built form and building design; and sustainability and environment. These concerns were raised in the context of the direct interface with Ainslie School and the safety, wellbeing and amenity of children, families and staff.

Having reviewed the Stage 2 documentation, the Ainslie P&C strongly maintains its objection to DA202443065 on the basis that our original concerns have not been adequately addressed, resolved or meaningfully mitigated through the amended proposal.

1. Urban Structure, Native Systems and Landscape Character

The Ainslie P&C acknowledges that the Stage 2 documentation indicates that one English Oak (*Quercus robur*) specimen identified as dead is proposed for removal and replacement on a one-for-one basis, and that other existing street trees along Elder Street do not appear to be explicitly marked for removal in the amended plans.

Notwithstanding this, we remain concerned that the proposed verge drop-off and associated parking arrangements do not appear achievable without compromising the health, root zones or long-term viability of the existing mature street trees that contribute significantly to the character of Elder Street and the heritage setting of Ainslie School and the Ainslie Arts precinct.

The Stage 2 documentation does not provide sufficient detail to demonstrate:

- how construction works associated with the verge drop-off will avoid encroachment into tree protection zones;
- how existing plantings will be preserved during and after construction; and
- how ongoing vehicle movements, stopping and manoeuvring within the verge area will avoid soil compaction, root damage or gradual tree decline over time.

In the absence of clear, enforceable detail, the Ainslie P&C is concerned that the proposal presents a high risk of indirect tree loss or degradation, despite the absence of explicit removal markings in the amended plans. Further clarification is required to demonstrate how the verge drop-off can function as proposed while genuinely preserving the existing landscape character and established street tree plantings, consistent with the intent of the relevant assessment outcomes.

2. Site and Land Use – Proximity to Ainslie School

The Stage 2 documentation does not address the fundamental concern regarding the appropriateness of hotel accommodation and associated uses directly opposite a public primary school.

The amended proposal continues to lack sufficient clarity and enforceable controls regarding:

- the nature and operation of ancillary commercial or hospitality uses;
- the management of licensed premises in close proximity to children; and
- the protection of student privacy and safety during school hours and out-of-school-hours care operations.

Ainslie School operates between 7:30am and 6:00pm on weekdays, including during school holiday periods, and the amended proposal does not demonstrate how adverse impacts on a sensitive educational use will be minimised. The proximity of licensed facilities to the school remains unresolved and continues to raise serious concerns in the context of community safety and harm minimisation principles.

3. Access, Movement and Traffic Impacts

The Ainslie P&C remains gravely concerned that parking provision and traffic management continue to be inadequately considered and insufficiently resolved in the amended proposal. The original development application indicated the provision of 131 on-site car parking spaces, which formed a key part of the applicant's justification that statutory parking requirements could be met. However, the Stage 2 documentation is unclear, inconsistent and internally contradictory regarding the number of car parking spaces now proposed. The updated development application material appears to reference only 57 car parking spaces,

representing a substantial reduction from the original proposal and raising serious questions about compliance with the ACT statutory parking provisions applicable to the proposed use. This apparent reduction is not supported by:

- a revised parking demand assessment;
- a clear explanation of how statutory parking requirements are now being met; or
- a transparent assessment of the likely impact of reduced on-site parking on surrounding streets.

In the absence of this information, there is a strong concern that the amended proposal is increasingly reliant on public on-street parking to satisfy statutory and operational parking demand, contrary to the intent of the Planning framework and notwithstanding the already constrained nature of parking on Elder Street.

These concerns are particularly acute given:

- existing parking stress during school drop-off and pick-up periods;
- high pedestrian and cyclist activity associated with Ainslie School;
- the presence of multiple community and recreational uses in close proximity; and
- the unchanged driveway arrangement directly opposite an existing school access point.

The continued lack of a robust, updated traffic and parking assessment that reflects real-world school operating conditions reinforces our view that traffic safety, parking impacts and statutory compliance remain unresolved.

4. Construction Management and Regional Impacts (New)

The Ainslie P&C is also concerned that the Stage 2 documentation does not include a meaningful or detailed construction management plan, particularly given the scale of the proposed development and its location directly opposite a primary school.

The documentation does not adequately address:

- how construction traffic will be managed to avoid peak school arrival and departure times;
- how pedestrian safety will be maintained during construction, particularly for children and families;
- whether temporary road closures, traffic diversions or loss of on-street parking will occur; or
- how cumulative impacts on the surrounding Braddon area will be mitigated.

We note that recent construction activity in neighbouring parts of Braddon has involved road closures, reduced access and significant inconvenience to residents and community users, highlighting the real and tangible impacts that large-scale construction can have on surrounding areas. In the absence of a clear construction management framework, there is a high risk that similar disruptions will occur in the immediate vicinity of Ainslie School, with unacceptable consequences for safety, accessibility and daily school operations. Given the sensitivity of the site, the lack of detailed construction management planning represents a significant omission in the assessment material.

5. Built Form, Scale and Heritage Context

Despite minor revisions, the amended proposal remains significantly denser and larger in scale than anticipated by the planning framework and continues to dominate the Elder Street frontage.

The Stage 2 documentation does not adequately resolve concerns regarding:

- building height, bulk and visual dominance;
- insufficient setbacks and transition to adjoining residential and community uses; and
- failure to meaningfully acknowledge or respond to the heritage values of the adjacent school precinct.

The proposed changes do not demonstrate a built form that is a sensitive or appropriate neighbour to Ainslie School or the surrounding community.

6. Noise, Servicing and Ongoing Amenity Impacts

The Stage 2 material does not resolve concerns regarding:

- ongoing noise impacts from servicing, waste collection and delivery vehicles;
- increased traffic noise during school operating hours; and
- cumulative impacts on student concentration, wellbeing and learning environments.

There remains a lack of enforceable measures to ensure that operational impacts are minimised during school hours and peak school activity periods.

7. Consultation and Community Engagement

The Ainslie P&C notes that, despite the opportunity presented by the Stage 2 process, there has still been no meaningful consultation with the school community. This continued absence of engagement reinforces our concern that the amended proposal has been progressed without adequate understanding of the daily operation of the school, the safety needs of children, or the cumulative impacts on the surrounding community.

Conclusion – Strong Objection Maintained

For the reasons outlined above, the Ainslie School Parents and Citizens Association strongly and unequivocally objects to Development Application DA202443065.

The Stage 2 (s179B) amendments do not adequately address the substantive concerns raised in our original representation. Of particular concern is the continued failure to resolve issues relating to child safety, statutory parking compliance, traffic and construction impacts, landscape and heritage character, and compatibility with a sensitive educational use.

We are deeply concerned that the progression of this application suggests the planning authority is not adequately responding to or giving sufficient weight to the concerns raised by the Ainslie School community. Approval of this development would set a troubling precedent for other sites adjoining or located near primary schools, signalling that the safety, amenity and wellbeing of children can be compromised in favour of inappropriate development outcomes.

For these reasons, the Ainslie P&C respectfully submits that DA202443065 should not be approved in its current form.

Signed,

Ainslie School Parents and Citizens Association

Ainslie School

Donaldson Street, Braddon ACT 2602

[REDACTED]

ATTACHMENT A – Original representation for DA202443065

11 August 2024

To whom it may concern

Representation for Current Development Application (DA202443065)

As the elected office bearers and committee members of the Ainslie School Parents and Citizens Association (Ainslie P&C) we submit an official objection against the Development Application DA202443065 for Block 16, Section 25, Braddon (21 Elder Street, Braddon). We provide here representations against the development application for its failure to adequately address the CZ6 zoning assessment outcomes for: urban structure and native systems; site and land use; built form and building design; access and movement; and sustainability and environment. This submission expresses significant concerns about issues directly relevant to the school's functioning and safety and wellbeing of students (see assessment outcomes 6, 7, 8 and 21). It also comments on broader issues regarding how the proposed development would affect the heritage values of the surrounding area (see assessment outcomes 2 and 13).

Urban structure and native systems

Assessment outcome 2: Loss of native habitat and biodiversity is avoided and/or minimised.

Regarding the assessment outcomes for urban structure and native systems, we argue that the plans submitted for DA202443065 do not represent a design that is consistent with the current urban planning, streetscape and scale of surrounding residential and non-residential properties in the area.

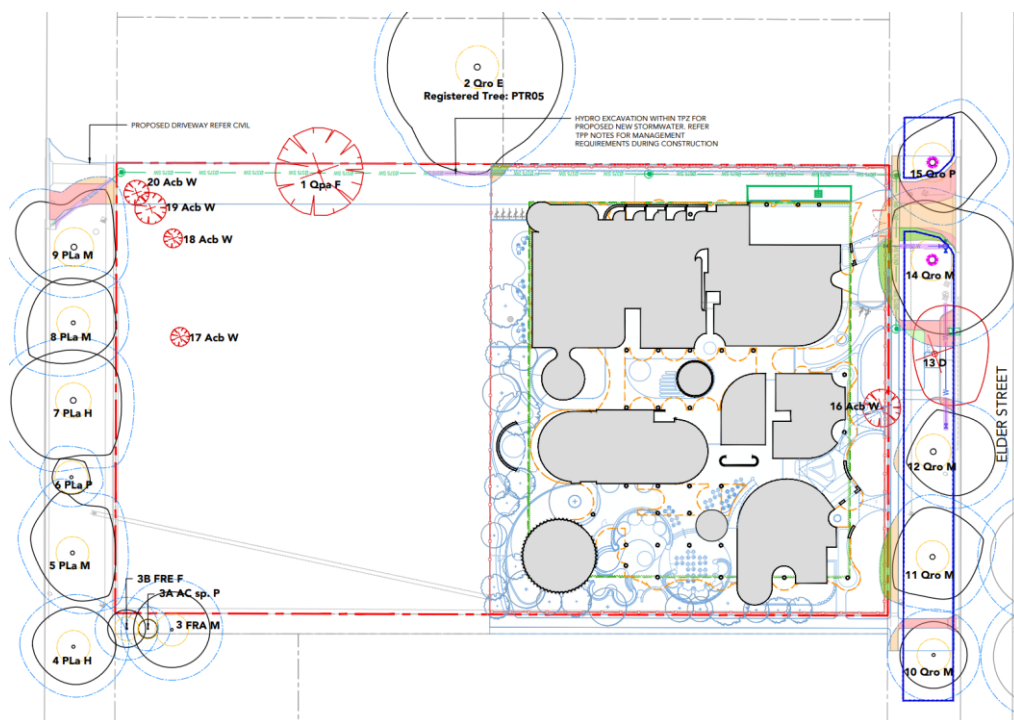


(Source: [DA202443065 Composite street elevation](#))

There is particular concern in relation to assessment outcome 2. We express significant concern regarding the retention of the surrounding landscape of plantings of *Quercus robur* (English Oak) which are integral to the character of the heritage listed Ainslie School and Ainslie Arts precinct as it approaches its 100-year anniversary.

A significant specimen of this street planting (**13D** on the application's tree management plan; source: [Tree Protection Plan 1](#)) is marked for removal to accommodate a verge drop-off area for the proposed hotel development. It is our belief that the location of any new plantings adjacent to this verge will not reflect the uniform nature and character of the historic street tree planting along Elder Street.

We also express significant concern about the quality ratings provided for trees along Elder Street in the tree management plan documents. They suggest that specimen **15Qro** also be removed and that specimens **10,11,12** and **14Qro** represent only 'some value' and 'should be retained if appropriate to land use and future management cost and risks' (source: page 2 [Tree Management Plan](#)). Based on this assessment it is our opinion that DA202443065 makes no meaningful guarantees to preserve the historical street tree plantings or overall character of the Elder Street area.



Source: [Tree Protection Plan 1](#)

Site and land use

Assessment outcome 6: Adverse impacts of development on surrounding uses (both within site and on adjoining sites) is minimised and residential amenity protected. This includes between residential uses and between non-residential and residential uses.

We argue that the scale and nature of the development application are not sympathetic to the surrounding CFZ community and RZ1 residential zones and do not satisfy the requirements of assessment outcome 6. The Ainslie P&C questions the appropriateness of providing hotel accommodation — as opposed to long-term accommodation for potential families or, as the current use allows, childcare services — directly opposite a public primary school. Proceeding with a hotel development will not provide a meaningful benefit to the surrounding community and also sets an alarming precedent for similar sites across the ACT.

The main bulk of the development is planned to sit directly opposite Ainslie School's Kindergarten "Yerra" education space. The Yerra outdoor space is used regularly for educational purposes throughout the day and is also a designated area for children who require accessible and inclusive supports at the school. We express significant concern regarding the impacts of noise and vibration on young students (some of whom have significant accessibility and inclusion requirements) during the construction phase for such a large project and the possibility of ongoing disruption upon completion of the project.

We are further concerned regarding the lack of clarity about additional businesses proposed for the site and how these will affect the community and whether the proposed number of parking spaces will accommodate all visitors and staff attending these establishments.

With the inclusion of the Ainslie Out of School Hours Care program, Ainslie School operates from 7:30am to 6pm each working day (this includes during school holiday periods). The applicant has made no mention to the impact of hotel accommodation and licensed hospitality on the safety and privacy of children on the school campus during these hours. This is particularly concerning given the proposal to include licensed facilities in such close proximity (approximately 60 metres) and we question how this is appropriate in the context of the ACT *Liquor Act 2010* and its harm minimisation and community safety principles. We refer to section 10h which states that:

licensed premises and permitted premises should not be located where they would be likely to cause undue disturbance, inconvenience or offence to people—

(i) lawfully at adjacent or nearby premises; or

(ii) because of the premises' proximity to a place of public worship, a hospital or a school;

Access and movement

Assessment outcome 7: The functionality and layout of the development is accessible and adaptable while achieving good connections with the surrounding area.

Assessment outcome 8: The development encourages active travel through safe and convenient access to the active travel network.

Parents and carers of children at Ainslie School note that the traffic management and parking arrangements on the Elder Street side of the school are already under significant pressure from local residential and non-residential traffic, school related traffic and commuters accessing nearby areas. This not only affects vehicular drop-off and pick-up but also the safety of children and families who walk and ride to and from the school.

DA202443065 suggests that the ground floor of the development will create pedestrian pathways, including the proposed shared zone that connects Elder Street to Farrer Street. There is little detail on how this works and how this considers the safety of children and families who access Elder Street via Farrer Street.

The development application indicates that future development on the remaining half of the site will be serviced by the currently proposed driveway. We note that there is considerable uncertainty around how this will impact local traffic on Elder Street and the safety of students and families at the school. The driveway is opposite an existing school driveway which experiences high flow of traffic and is a required access point for families with accessibility requirements, such as families who require wheelchair accessible vehicles. There has been no consultation with parents or carers of the school community regarding how safety of pedestrians will be managed.

Furthermore, Elder Street already lacks a school crossing because of the reduced number of parking spaces this would result in. The scale of the proposed development would necessitate a formal crossing which would further reduce the number of parking spaces in the area. Given the absence from the traffic report and the associated survey of any reference

to bicycle and pedestrian use of the surrounding area conclusions such as the mentioned need for a crossing would be essential to maintain pedestrian and cycle safety impacted by the intended use as outlined in this development application.

Currently, there are insufficient street parking spaces to accommodate parent and carer vehicles at peak times, including pick up and drop off, and many families are required to park in adjacent streets, including Farrer Street to access the school. We refer to the SALT traffic report which records a total of 55 spaces subject to various restrictions located on Elder Street. These spaces are currently insufficient for accommodating local non-residential and residential needs. The SALT report does not factor in the potential growth of school enrolments. Currently enrolments at Ainslie School for years for K-6 are approximately 433. This represents a 22.9% increase in enrolments from 2017 which reported 344 enrolments (source: [Ainslie School board reports](#)). We strongly argue that the images provided in the SALT traffic report are not indicative of parking stress in the area which is more accurately represented by images taken Friday 9 August (2.58pm–3pm).



(Source: Images by P&C President Niki van den Heuvel, 2024)

We also note that the SALT traffic survey conducted for the development application occurred on one day only, Thursday 31st August, 2023 3pm–8pm, which completely ignored the morning and daytime use of the site, and does not adequately reflect increased demand for parking across the natural cadence of each day of use by the school. For example, many more parents and carers are required to use their vehicles in bad weather, if there are events at the school and on particular days and times of the week, such as Friday afternoon.

With the inclusion of the Ainslie Out of School Hours Care program, Ainslie School operates from 7:30am to 6pm each working day — further regular movements extend this time with staff arriving 30 minutes prior to and after these times. The traffic report does not acknowledge or address why it does not cover 7.5 hours of the operational hours of use of the school and only was surveyed for the final 3 hours. With this in mind we call into question the appropriateness of this traffic report and all conclusions drawn from them regarding parking availability, use and vehicle movement.

The development application does not provide sufficient car-parking spaces to accommodate guests and staff. We refer to the SALT traffic report which states that:

The proposal generates a minimum car parking requirement of 169 spaces: - The architectural plans indicate the proposal will provide 131 on-site car parking spaces and car parking surveys indicate there is a minimum availability of 117 spaces and 61 spaces within an approximately 200 metre walking distance of the site during respective Saturday and weekday surveys. On this basis, the statutory car parking requirement can be satisfactorily accommodated at the site and on the surrounding street network as permitted by the locational requirements in the ACT 'Planning (Commercial Zones) Technical Specifications 2023'; and - Notwithstanding the above, our temporal assessment of car parking demands suggest that the proposal will generate a typical car parking demand between 89 and 122 spaces, which could be fully accommodated on-site. (Source: page 33 [Traffic Impact Assessment](#))

and:

Notwithstanding, in the event that short-term car parking demands exceed the publicly accessible parking provision at B1 level, the car park has been designed to allow recirculation and egress to Elder Street in a forward direction where additional short-term car parking spaces can be found, as identified in the parking surveys and permitted by the Technical Specifications. (Source: page 22 [Traffic Impact Assessment](#)).

We strongly argue that any assumptions made in the report regarding required parking spaces cannot be made based on a survey conducted at a single point in time in an area which experiences significant fluctuations in traffic. It is worth noting also, that usual check-out and check-in times at hotels generally occur at approximately 10am and 2pm. The impact from any increased traffic in the area during these periods has not been factored into the needs of parents, carers and children at Ainslie School. We object to the assumption that overflow parking from the site can be adequately accommodated by parking spaces on Elder Street. The obligation on meeting statutory parking should remain exclusively with the applicant given the already constrained and common use of this space from other community services including Ainslie School, the Braddon Tennis Club and the existing daycare centre KU Braddon.

Built form and building design

Assessment outcome 13. The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks.

We express significant concern regarding the large scale of DA202443065 and its impact on the Elder Street streetscape. We note that there has been no mention of the heritage values of the precinct of Ainslie School and Ainslie Arts Centre (formerly Ainslie Public School) despite their heritage status. The block and its adjoining road verges as listed on the ACT Heritage Register (entry 20050) and [Ainslie Primary School](#) and [Ainslie Public School](#) are listed on the National Register and protected under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The application's omission of this status reflects a distinct misunderstanding of the use and nature of the area.

We refer to the National Capital Design Review Panel's initial response to the development that: *the proposal is significantly denser than anticipated by the planning framework and in excess of the anticipated building heights* (source: page 2 [NCDR Panel's Advice](#)). We do not believe that reductions proposed in DA202443065 to scale back the bulk of the fifth-floor are a suitable response to the recommendation that *in order for the scheme to be considered for support, significantly more work needs to be completed to demonstrate a built form character that responds more appropriately to its context* (source: page 2–3 [NCDR Panel's Advice](#)).

Sustainability and environment

Assessment outcome 21. The development considers, addresses and mitigates site constraints and environmental risks, including natural features, topography, noise, bushfire, flooding, contamination, air quality or hazardous materials are appropriately considered for the site.

As noted under the assessment outcomes for site and land use, we express significant concern regarding impact from noise and distraction to the school's students through increased traffic volume including, pick-ups and drop-offs and delivery and service vehicles. We also refer to the waste management report and schedules for the removal of general waste every day and recycling waste twice a week. There has been no consideration by the applicant to minimise the impact of these disruptive vehicles on the residential and non-residential community on Elder Street (Source: [Waste Management Overview drawing](#)).

Final considerations

In concluding our representation against DA202443065 we emphasis the National Capital Design Review Panel's advice that *The proponent should consider how best to be a sensitive neighbour to the local community, including the Ainslie School community and develop the design with this consideration* (source: page 3 [NCDR Panel's Advice](#)).

There has been a distinct lack of any consultation by the applicant among the community, including parents and carers of children attending Ainslie School. This is particularly striking given that we are led to believe that the applicant occupies the residence adjacent to the development site and directly opposite the school grounds. We believe that the many omissions in this development application seem to stem from a misunderstanding of the use of the area and show no awareness of the impact of pedestrian and child safety. Consultation with the P&C and school community by the developer would have provided a forum to surface feedback that could have been incorporated into a valid and appropriate development application more in line with the developer's previously stated intentions for the site.

We look forward to reviewing any further development application that considers the needs of the whole community. The current zoning of a childcare centre remains in line with use that supports the community and would only strengthen a common and shared purpose in supporting the needs, safety and development of young children and their carers.

Signed, Ainslie School Parents and Citizen's Association