



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: 020

Submitter: Name withheld

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Standing Committee on Environment and Planning

ACT Legislative Assembly

LACommitteeEnvironment@parliament.act.gov.au

Re: Inquiry into DPA-07 — Former Braddon Bowls Club

8 May 2026

I write as a resident of Braddon and parent of a child enrolled at Ainslie Primary School to register my strong objection to Draft Plan Amendment 07 (DPA-07), which proposes rezoning the former Braddon Bowls Club site (Part Block 16 Section 25 Braddon) from CZ6 to RZ4. My primary concern is the direct and foreseeable impact of the proposed rezoning on the safety of students walking and cycling to Ainslie Primary School, particularly along the pedestrian and cycling path connecting Farrer Street and Elder Street that my child uses daily. I also endorse the planning and community concerns raised by other submitters, including the objection lodged by Daniel Green of [REDACTED] Braddon, and the concerns of the Braddon Tennis Club.

1. Student Safety on Elder Street and the Farrer–Elder Pathway

The pedestrian and cycling path connecting Farrer Street and Elder Street runs directly alongside the proposed development site and is a primary active travel route for students at Ainslie Primary School. My child uses this path to walk and cycle to school. The path terminates at Elder Street, where students must cross to access the school. There is currently no designated pedestrian crossing or cycling crossing on Elder Street at this point. During drop-off and pick-up periods, Elder Street experiences significant vehicle congestion, and children routinely have to cross between stationary and moving vehicles because no safe crossing infrastructure exists. I observe this daily: between 8:45 and 9:00 am and between 3:00 and 3:15 pm, the crossing is chaotic, with children navigating gaps in traffic without any designated safe point to cross.

Rezoning the site to RZ4 will, by design, permit a significant increase in residential density and associated vehicle movements. The ACT Government’s own consultation report for DPA-07 acknowledges that “current pressures during childcare and school peak periods are already significant” and that “increased traffic and reduced parking availability pose risks to children” (Consultation Report, Section 3.3.2). The authority’s response to this concern — that traffic and safety matters can be “more comprehensively resolved at DA stage” — is inadequate. The scale of permissible development, and therefore the volume of additional traffic generated, is determined at the rezoning stage. Deferring a safety assessment for a school crossing to the development application stage means approving the conditions that create the hazard before assessing whether the hazard can be managed.

The Braddon Tennis Club’s submission to this inquiry further identifies that the development’s design incorporates the Farrer–Elder pathway as a pedestrian accessway for residents of the proposed development. If the pathway serves as both the school active travel route and a residential access route for a high-density building, the volume and mix of users on that pathway will increase substantially, introducing additional hazard for children on bikes and on foot. This design conflict should be assessed and resolved before, not after, the rezoning is approved.

This situation **sits in direct tension with the ACT Government’s own Active Travel Plan 2024–30**, whose stated vision is “more Canberrans walking and cycling more often” and whose first priority is safe infrastructure for walking and cycling. The Plan explicitly identifies travel to school as a key use case for active travel investment. The ACT Government has also separately invested public funds in the Garden City Cycleway, specifically to connect Braddon to Ainslie, with a stated purpose of making it safer for students and cyclists to travel between these parts of the Inner North. It is not consistent to invest in active travel infrastructure for this corridor while simultaneously considering a rezoning that will increase vehicle traffic on the crossing point where school children currently have no protected way to cross, and deferring any safety assessment of that conflict to a later stage.

I ask the Committee to recommend that, at minimum, a pedestrian and cyclist safety assessment for the Farrer–Elder pathway and the Elder Street school crossing be required as a condition precedent to any rezoning approval, not deferred to the DA stage.

2. Construction-Phase Disruption to the School

The site is immediately adjacent to Ainslie Primary School. Construction of a high-density development at this scale will generate extended periods of heavy vehicle movements, noise, dust, and disruption to the surrounding footpath network. The Farrer–Elder pathway that school children use daily is the most likely construction vehicle access corridor given the site’s geometry. I ask the Committee to require that any development approval include a detailed construction traffic management plan prepared in consultation with Ainslie Primary School, specifying how child pedestrian and cyclist safety on the pathway will be maintained throughout construction.

3. Rezoning Concerns: Consistency with the Territory Plan and District Strategy

I also endorse the detailed planning objections raised by Daniel Green of [REDACTED] Farrer Street Braddon, and wish to associate my submission with his. In summary:

- The current CZ6 zoning, and the Crown Lease conditions that accompany it, designate the site for community and leisure use. The Crown Lease specifically limits use to a Bowling Club and/or Child Care Centre. Rezoning to RZ4 would result in a permanent loss of that community purpose and sets a precedent for the conversion of other CZ6 sites under similar developer pressure.
- The surrounding properties on Farrer Street, Elder Street, and Girrahween Street are zoned RZ1. The Inner North District Plan and the ACT District Strategies Plan (2023) do not identify this area as a ‘change area’ or as a location targeted for higher-density development over the next 15 years. The proposed rezoning to RZ4 is not consistent with the planning strategy documents the Authority has itself adopted.
- The ACT Heritage Council’s response to DPA-07 specifies that future development “should provide a sympathetic design response to the local character with regard to bulk, height, scale, setting and materiality.” Rezoning to RZ4, which permits significantly greater height and density than RZ1, is not the mechanism to achieve that outcome. If any rezoning is to be permitted at all, it should be to RZ1 to align the site with the surrounding residential character.
- The Consultation Report’s response to concerns about strategic consistency effectively restates the developer’s own position on proximity to public transport. The

nearest tram stop is approximately 1,000 metres from the site. The Inner North District Plan's identification of corridors for increased density focuses on Northbourne Avenue, not on residential streets in this part of Braddon.

4. Summary of Requests

I ask the Standing Committee to recommend that the Minister not approve DPA-07 in its current form, and specifically that:

- A pedestrian and cyclist safety assessment for the Farrer–Elder pathway and the Elder Street school crossing be completed and made public before any rezoning decision is made.
- Any conflict between the proposed development's use of the Farrer–Elder pathway as a residential accessway and its existing function as a school active travel route be assessed and resolved at the planning stage.
- If rezoning is to be approved, it be limited to RZ1 to bring the site into alignment with the surrounding residential area and to preclude the high-density development that is the evident purpose of the current application.
- The Crown Lease conditions that designate this site for community use be given full weight in the Committee's deliberations, recognising that a community space that has existed for over 90 years cannot be replaced once converted to residential development.

I am willing to appear before the Committee to speak to these concerns.

Sincerely,

A large black rectangular redaction box covering the signature area.