



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: 005

Submitter: Terry Beven

Date authorised for publication: 14 May 2026

**The Standing Committee on Environment and Planning
Inquiry into Draft Major Plan Amendment to the Territory Plan DPA-07
(Site of former Canberra City Bowling Club, Block 16 Section 25 Braddon)**

Dr Terence (Terry) Beven

Email: [REDACTED]

Mobile: [REDACTED]

Block 16 Section 25 Braddon [REDACTED], so I have an intense interest in outcomes for it. My wife Mrs Kim Beven also supports this submission.

Our lease is [REDACTED]. We wish to protect our residential amenity and privacy. We also want to see Block 16 used for purposes in keeping with our neighbourhood.

Summary of this Submission

Intentions for Block 16 Section 25 Braddon can be viewed as a test for the ACT Planning Framework. Rezoning, for example, would remove part or perhaps eventually all of a community-use green space in Braddon, which is underserved by accessible, usable, enhanced green spaces. A rezoning of any part of Block 16 risks severe negative impacts on the amenity of nearby residential areas, particularly with regard to noise, traffic, parking and privacy. Plans for part of Block 16 should not be assessed in isolation from intentions for another part of the Block. Farrer (and Elder) Streets are both on their face completely unsuitable for high multi-storey, densified developments. A previous DA 202240531 in 2022 effectively subdivided Block 16 for the express purposes of a substantial child care centre and a new bowling club, both of which have since been abandoned without justification. A proposed new road right next to and all along our side boundary shown on submitted plans as connecting Elder and Farrer Streets is completely unacceptable. As residential lease-holders of [REDACTED] Block 16, we will vigorously protect our amenity and right to the quiet enjoyment of our lease. The Committee's enquiry presents an opportunity for a more strategic approach to Block 16 Section 25 Braddon.

Comments, Representations and Recommendations

1. The Committee could consider whether The Bulum Group — as itself and through entity(ies) (hereinafter “the Developer”) — is acting or has acted in good faith concerning its acquisition in 2015, and stewardship since, of Block 16 Section 25 Braddon.

2. We are leaseholders of [REDACTED] [REDACTED] [REDACTED]. We have been very concerned and affected by the Developer's past actions and apparent future intentions. For example, the Committee should know that previously submitted plans appear to show an extraordinary new road right next to our side fence, connecting Elder and Farrer Streets.

3. We request the Committee take this opportunity for a strategic level review of the situation for Block 16. The file on the Developer's various intentions and applications would be quite comprehensive by now. The Directorate or an appropriate authority could be requested to review the file at a strategic level and respond to the Committee with recommendations for future official community engagement over Block 16. Residents and others including Ainslie Primary School have consistently shown their preparedness to provide thoughtful comments, representations and submissions.

4. The Developer has at various stages sought to densify either or both parts of Block 16 (Elder St southern side and Farrer St northern side). The Committee could take note that whenever opposition to plans for one side has been encountered, the Developer has seemingly shifted focus to the other side for similar plans.

5. The Committee could note that surrounding residents, including those who may have tentatively supported some re-development of Block 16, have consistently called for a limit on any such development of strictly no more than 2 storeys. All residential leases on Elder, Donaldson, Farrer and Girrahween Sts (between Fawkner St and Limestone Ave) are RZ1. Development beyond two storeys would not “protect the amenity of nearby residential areas, with regard to noise, traffic, parking and privacy”. In particular, we will defend and protect our residential amenity and right to quiet enjoyment of our lease.

6. Our own lease ([REDACTED])

[REDACTED] The Committee could consider that rezoning and/or densification of Block 16 including more than two storeys risks compromising this oak tree and denying to the community a clear vista of a unique feature of Canberra’s heritage. Related to this, the Urban Forest Act 2023 Section 13 states:

“13 Meaning of protection zone for protected tree

(1) For this Act, the protection zone for a protected tree is—

- (a) the area under the canopy of the tree; and
- (b) the 2m wide area surrounding the vertical projection of the canopy; and
- (c) the 4m wide area surrounding the trunk as measured at 1m above natural ground level.

(2) However, if another protection zone is defined in a tree management plan in force for the protected tree, that protection zone is the protection zone for the tree.”

7. The Committee could consider that rezoning of any part of Block 16 would potentially facilitate a continuing pattern of what have often seemed to be incongruous development applications, detrimental to a peaceful residential and heritage area, including the treasured Ainslie Primary School, distressingly for the community.

8. The Committee should know the community has been led in contradictory directions and proposals that have attracted widespread public attention [e.g. “New hotel and day spa planned for Braddon site”, Lucy Arundell, Canberra Times, 10/07/2024 (<https://www.canberratimes.com.au/story/8689983/new-hotel-and-day-spa-planned-for-braddon-site/>); “Bulum Group opens consultation on former Canberra City Bowling Club site”, Miriam Webber, Canberra Times, 07/12/2022) (<https://www.canberratimes.com.au/story/8008653/developer-resumes-plans-for-former-canberra-city-bowling-club-site/>)]

9. A 2022 Development Application DA 202240531 effectively split Block 16 in two, on Farrer and Elder St. The Committee could note through DA 202240531 the Developer obtained approval for a lease purpose variation for a large child care centre on Elder St, for which sound reasons were advanced, and a new bowling club on Farrer St. Many residents took this on its face in good faith. Their confidence would have been boosted by arguments in support of DA 202240531 by the Developer’s agent Purdon Planning, which stated the lease purpose change was: “To use the premises only for the purpose of a Bowling Club and any purpose incidental thereto; and a child care centre” and “The Client is keen to include maximum gross floor area of 1,232m²” for the child care centre [Purdon Planning, Planning Report and Statement Against Criteria, April 2022, p 7]. Purdon

Planning also stated: “The additional childcare centre use will not impact Braddon’s existing healthy low density residential community but will service many families in the walking distance. Future design and siting DA will take into consideration the existing low density residential community and garden city characters” [Goal 3 Response, p 11].

10. The Committee could note the Developer obtained approval to split Block 16 for reasons subsequently abandoned, seemingly without explanation or further advice or consultation including with those who held a reasonable good-faith belief the Developer intended to place a child care centre on Elder St and a bowling club on Farrer St.

11. The Committee could inquire what happened to the Child Care Centre and new bowling club. In this respect, the Committee could take note of advice of 24 May 2024 by Phil Green AAPI CPV provided to the Applications Secretariat that the Lease Variation to Block 16 would alter its value from V2 (before lease purpose change) of \$4,970,000 to V1 (after lease purpose change) of \$10,200,000, an increase of \$5,230,000 [letter from Phil Green Director Valuation and Consultancy, MMJ Canberra to The Manager, Applications Secretariat, EP&SD Directorate, 24/05/2024].

12. The Committee could also take note of the response by Dan Stewart (Purdon Planning) of 14 June 2022 to an email inquiry that “The lease variation DA is to add childcare as a permitted use on the site and the architectural drawing is to show that both uses — bowling club and childcare — can be accommodated on the existing footprint. The plan that has been included is for illustrative purposes only and any new development on the site will require a separate, detailed design and siting DA that meets all planning rules for the zoning, proposed use(s) and location.” [Box, texts of relevant emails.]

From: Terry Beven [REDACTED]
Date: Tue, 14 Jun 2022 at 10:20 am
Subject: DA for 21 Elder St
To: [REDACTED]

For attention of Dan Stewart

Dear Dan

About the application for variation of lease purpose for the bowling club site between Elder St and Farrer St Braddon, we (my wife Kim and I) are puzzled. We live at [REDACTED].

For example, in the statement against the selection criteria, on page 6, there is a plan architectural drawing that shows the outline of a bowling club and kindergarten, with a dividing line between them. We are puzzled by what this dividing line means. Also, does this mean there will be a bowling club on the site? As well, the plan does not show what separations there will be from residential boundaries.

I would be grateful if you could clarify the lease variation for me. Some additional information on the purpose of the lease variation and the plan drawing would be helpful.

Yours sincerely
Terry Beven
[REDACTED]

Sent from Gmail Mobile

----- Forwarded message -----

From: Dan Stewart [REDACTED]

Date: Tue, 14 Jun 2022 at 1:59 pm

Subject: RE: DA for 21 Elder St

To: [REDACTED]

Cc: Naina Agarwal [REDACTED], Maggie Li [REDACTED]

Hi Terry

Thank you for your email.

The lease variation DA is to add childcare as a permitted use on the site and the architectural drawing is to show that both uses — bowling club and childcare — can be accommodated on the existing footprint. The plan that has been included is for illustrative purposes only and any new development on the site will require a separate, detailed design and siting DA that meets all planning rules for the zoning, proposed use(s) and location.

Please let me know if you have any further questions.

Kind regards

Dan

13. The Committee could assess whether any rezoning of Block 16 would test the integrity of the Planning Framework under the *Planning Act 2023*.

14. The Committee could consider the Developer keeps seeking to advance Development Applications more in keeping with the policy outcomes for “CZ5-Mixed Use Zone”. In this regard, it seems relevant that the Government Response to the Standing Committee on Planning and Environment – Report No. 35 of 2009 circulated by then Minister for Planning, now Chief Minister, Andrew Barr, recommended: “3. That future variations to CZ6 zones in the Territory Plan be assessed at a strategic level and consider the impact on the entire stock of CZ6 zoned areas rather than on a site-by-site basis.”

15. The Committee could consider whether the Developers’ proposals — including any rezoning of part or all of Block 16 — places that block in competition, conflict or juxtaposition with the carefully planned and executed outcomes of the Braddon mixed-use precinct around Lonsdale and Mort Sts, which arose through a full consultative process including widely promulgated official documents and maps with overlays showing densification and mixed-use purposes. (Likewise, from a similar process the area bounded by Torrens, Girrahween, Fawcner and Elouera Sts was designated for apartments.) The Committee could note there are no such overlays on official documents or maps for densification or for that matter mixed-use development on Block 16 or any part of it [Territory Plan 2023 Inner North and District Policy, or City Renewal Authority Precinct Portal, etc. refer]. The Committee could recommend that the local community be thoroughly consulted at a strategic level by an appropriate government authority, as to whether Block 16 or any part of it is anticipated as suitable or desirable to host in future highly-densified or multi-storey or mixed-use developments.

16. The Committee could consider whether Block 16 presents an excellent case of apparently available urban green space for enhancement. In this respect, the Committee could recommend Block 16 be spared rezoning and/or dense redevelopment so that its

green space might remain and become a community asset for all of Braddon (and for that matter Canberra) within a surrounding, non-encroaching, low-impact area.

17. The Committee could act now or through a further process to prevent the removal of a community-use green space within an RZ1 low-density, low-level residential and heritage area. In this regard, it is significant that in 2024 the ACT Legislative Assembly's Standing Committee on Planning, Transport and City Services recommended: "the ACT Government take steps to ensure there are opportunities for ample green space in areas subject to densification" [Inquiry into the Territory Plan and other associated documents, March 2024, Recommendation 24, page ix]. The Committee Chair stated in added comments she considered this did not go far enough, saying: "At a minimum there must be protection of living infrastructure plus the enhancement of urban green spaces" [para 1.17, page 146]. Notably, the Chair recommended that the Government "Ensure that there are opportunities for ample green spaces in areas subject to densification and those areas are refurbished to meet the needs of the local community so they provide opportunities for recreation, meeting and creating connections" [Recommendation 5, page 149].

18. The Committee could take note that previously the National Capital Design and Review Panel called attention to potential shortfalls in proposals such as those put forward by the Developer. The Panel drew particular attention to nearby heritage Ainslie Primary School. [NCDRP Advice, 28 September 2023]. The Committee could further this timely consideration to include impacts not only on the heritage Ainslie Primary School, but also on the Ainslie Arts Centre, Salvation Army Hall, Tennis Club and Shakespeare Hall, which all also date from Canberra's earliest days and are accorded special status.

19. The Committee could recommend that any rezoning or other application for part or all of Block 16 should not be considered in isolation from how it connects with other plans, including current or future applications for development of the remainder of Block 16.

20. The Committee could take this opportunity to enquire if it is the Government's, Chief Planner's, TPA's or City Renewal Authority's intention to facilitate designating any part of Farrer or Elder Sts for future mixed-use or multi-storey development, including any part of Block 16. If so, perhaps the Committee could recommend an appropriate authority advance such a vision transparently and engage at a strategic level with the community, rather than via the current apparently piecemeal approach.

Signed

Terence Patrick Beven

Supported by

Jeong-Bok Kim Beven

6 May 2026