



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: 011

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**Submission to the Standing Committee on Environment and Planning
Inquiry into Draft Major Plan Amendment DPA-07
Former Braddon Bowls Club Site — Block 16 Section 25 Braddon**

From: Richard Ciesniewski, [REDACTED]

Dear Committee Members,

I appreciate the opportunity to provide comments regarding Draft Major Plan Amendment DPA-07 concerning the former Braddon Bowls Club site.

As a resident living in the immediate vicinity of the proposal, I am concerned about the long-term planning implications of rezoning part of this site from CZ6 to RZ4. In my view, the amendment raises broader issues relating to neighbourhood character, planning consistency, cumulative development impacts and the ongoing loss of community-oriented land within the Inner North.

For the reasons outlined below, I believe the amendment should not proceed in its current form.

1. Strategic Planning Concerns

One of the central concerns with DPA-07 is that it appears inconsistent with the established planning framework applying to the surrounding neighbourhood.

The nearby residential streets, including the Farrer Street and Elder Street area, remain predominantly low-density in character and are largely zoned RZ1. While ACT planning strategies identify some transport corridors and selected precincts for increased density over time, the immediate area surrounding this site has not been clearly identified as a major intensification precinct.

The proposed rezoning would therefore introduce a comparatively high-density outcome into an established low-scale residential setting without a broader precinct-wide planning process to support such a transition.

In practical terms, the amendment risks creating an abrupt interface between medium-density redevelopment and existing detached mostly single level residential streets. That type of transition is difficult to reconcile with orderly and coherent urban planning.

If the Territory intends to significantly alter the long-term planning direction for this part of Braddon, that change should occur through a transparent strategic review of the broader area rather than through an isolated site-specific amendment associated with redevelopment pressure on a single block.

2. Permanent Loss of Community and Recreation Land

I am also concerned about the long-term implications of losing land that has historically served a community and recreational function.

For many decades, the former bowls club formed part of the social and recreational fabric of the neighbourhood. The existing CZ6 zoning reflects that broader community-oriented role by supporting leisure, recreation, accommodation and related uses rather than standard residential redevelopment.

Although the bowling club itself may no longer operate, I do not believe the closure of one particular activity automatically justifies rezoning the land for medium-density residential purposes.

Community and recreational land within established inner-Canberra suburbs is becoming increasingly limited at the same time that population density is increasing. Once land of this nature is converted to residential zoning, opportunities to restore community-focused uses in the future are highly unlikely.

The ACT Planning Act 2023 places emphasis on liveability, wellbeing, sustainability and community participation. Retaining strategically located community-oriented land within established suburbs is consistent with those objectives.

In my opinion, insufficient weight has been given to the long-term strategic value of preserving this type of land use within the Inner North.

If changes to the site are ultimately considered appropriate, preference should first be given to uses that maintain a community, recreational or low-impact function compatible with the surrounding neighbourhood.

There is also a broader policy issue. Approval of this amendment may encourage further piecemeal rezoning of community and leisure sites elsewhere in Canberra, gradually eroding planning certainty for established residential areas.

3. Traffic, Parking and Safety Impacts

The surrounding streets already experience noticeable congestion and parking pressure at various times of the day and week, particularly during school activity periods, childcare pick-up and drop-off times, church events and weekend community activities.

Additional residential density on this site would inevitably increase:

- vehicle movements;
- visitor traffic;
- delivery and service activity;
- on-street parking demand; and
- congestion on local roads.

This is particularly important because the surrounding precinct includes a range of sensitive community uses, including:

- a childcare centre;
- Ainslie Primary School;
- aged care accommodation;
- a church; and
- nearby recreation facilities, including the tennis club and Ainslie School of Music.

These facilities are regularly accessed by young children, older residents, carers, visitors and people with mobility limitations. Increased traffic and parking pressure would reduce both safety and accessibility within what currently functions as a relatively low-intensity community environment.

I do not believe the proposed amendment adequately reflects the Planning Act's stated objectives relating to wellbeing, sustainability, liveability and community outcomes.

4. Key Impacts Deferred Until Later Stages

Another significant concern is that many important impacts are proposed to be examined only after the rezoning decision has already been made.

The DPA material indicates that matters such as:

- traffic impacts;
- parking demand;
- overshadowing;
- built form;
- noise impacts; and
- tree canopy considerations

would largely be addressed later through future development applications once more detailed designs are available.

In my view, this approach reverses the logical planning sequence.

The rezoning itself is the critical strategic decision because it establishes the development capacity and expectations for the site. Once RZ4 zoning is approved, the principle of substantially increased residential density is effectively accepted.

At that point, later assessment processes are generally limited to refining details rather than reconsidering whether the density increase was appropriate in the first place.

For that reason, issues relating to traffic generation, neighbourhood interface, parking demand, overshadowing and loss of vegetation should be rigorously and independently assessed before any rezoning occurs.

Given the sensitive context of this site and the number of nearby community facilities, these matters should not be deferred.

5. Fragmented Assessment of the Former Bowls Club Site

I am also concerned that the former bowls club land is being considered through separate planning pathways rather than through one integrated assessment process.

The DPA documentation notes that:

- the original site was subdivided in 2022;
- DPA-07 applies only to the northern portion; and
- a separate development proposal already exists for the southern section of the former site.

This fragmented approach makes it difficult for residents and decision-makers to properly evaluate the cumulative effects of redevelopment across the broader precinct.

The impacts arising from the northern and southern portions cannot realistically be separated. Nearby residents and community facilities will experience the combined consequences of:

- increased traffic;
- parking demand;
- construction activity;
- building scale and bulk;
- overshadowing;
- noise; and
- reduced neighbourhood amenity.

A more integrated planning assessment would provide greater transparency and allow the full implications of redevelopment across the former bowls club land to be properly understood.

6. Planning Certainty and Precedent

Many residents purchased homes in this area with the understanding that the established planning framework — including surrounding RZ1 zoning and nearby community-oriented land — would remain broadly consistent over time.

While cities inevitably evolve, substantial departures from long-standing planning settings should occur through broad strategic planning processes rather than isolated amendments applying to individual sites.

Approving DPA-07 may weaken community confidence in the predictability and consistency of the ACT planning system.

It may also establish a precedent for similar rezoning proposals involving other community or leisure sites across Canberra.

In conclusion, for the reasons outlined above, I respectfully request that the Committee recommend against proceeding with Draft Major Plan Amendment DPA-07.

The proposal raises significant concerns regarding:

- strategic planning consistency;
- neighbourhood character;
- traffic and parking impacts;
- loss of community-oriented land;
- cumulative redevelopment effects; and
- the deferral of critical planning assessments until after rezoning approval.

If future changes to the site are contemplated, they should occur only after:

- comprehensive community consultation;

- independent traffic and environmental assessment;
- proper cumulative impact analysis; and
- a planning framework that is demonstrably consistent with the broader neighbourhood context and ACT strategic planning objectives.

Thank you for considering this submission.

Richard Ciesniewski

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